# DEPARTMENT OF CITY PLANNING

## RECOMMENDATION REPORT

**City Planning Commission**

**Date:** November 17, 2022
**Time:** After 8:30 a.m.
**Place:** In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over the COVID-19 pandemic, the CPC meeting would be entirely conducted telephonically by Zoom [https://zoom.us/]. The meeting's telephone number and access code would be provided no later than 72 hours before the meeting on the meeting agenda published at: https://planning.lacity.org/about/commissionsboards-hearings and/or by contacting cpc@lacity.org.

**Public Hearing:** September 21, 2022.
**Appeal Status:** Not Applicable

**Case No.:** CPC-2022-5432-ZC-CPIOA
**CEQA No.:** ENV-2008-1781-EIR-ADD2
ENV-2008-1780-EIR-ADD2
**Incidental Cases:** None
**Related Cases:** None
**Council No.:** 8-Harris-Dawson
9-Price, 1-Cedillo
**Plan Area:** South Los Angeles,
**Specific Plan:** Various

**Certified NC:** South Los Angeles: Empowerment Congress North Area, Voices of 90037,

**GPLU:** Various
**Zone:** R1, R2, RD2, RD1.5, RD3, R3, [Q]R3, [Q]R4, C2-2D-CPIO

**Applicant:** City of Los Angeles
**Representative:** City of Los Angeles

**PROJECT LOCATION:** **The South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment Project.** The Project Location is an approximately 3,366.4 acre area (5.26 square miles) located within the South Los Angeles Community Plan Area (CPA) which includes neighborhoods to the west and south of the University of Southern California (USC) campus and Exposition Park. The Project Location is generally bounded by the Santa Monica freeway (Interstate 10) to the north; the Harbor Freeway (Interstate 110) to the east; to the south along Gage Avenue, from the Harbor Freeway westerly to Vermont Avenue, along West 62nd Street westerly from Vermont Avenue to Normandie Avenue; and along Martin Luther King Jr. Blvd. westerly from Normandie Avenue to Western Avenue, the westernmost boundary.

**PROPOSED PROJECT:** The Proposed Project is the South Los Angeles Community Plan Implementation Overlay Amendment Project. The Proposed Project includes zone changes that amend the text and figures in the South Los Angeles Community Plan Implementation Overlay (CPIO) District. The proposed CPIO amendment creates a new Protected Unit Area in the Residential Subareas that adds tenant protection regulations that reflect recent changes in state law, established by the Housing Crisis Act (collectively, Senate Bill (SB) 330 and SB 8) and adds some additional tenant protections beyond what is required under state level. The Proposed Project applies these tenant protection regulations, in addition to applying the existing applicable CPIO development regulations and design standards, to properties currently within the Residential Subareas (Chapter V) of the CPIO and to additional multi-family (R2, RD and R3) zoned properties, inclusive of a zone change to R1R3 (Rear Mass Variation) for two R1 zoned neighborhoods (36.02 acres total) within the Project area. Finally, the Proposed Project amends

the Transit-Oriented Development (TOD) Subareas (Chapter III) of the CPIO to upgrade access to bonus incentives for certain nodes within the Protected Unit Area from a lower to higher intensity TOD subarea.

**RECOMMENDED ACTIONS:**

1. **Recommend** that the City Council **find,** based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, including Environmental Impact Report, SCH No. 2008101098, (ENV-2008-1781-EIR and ENV-2008-1780-EIR), certified on November 22, 2017 (Project EIR), the Addendum dated October 2022 and the Addendum dated November 2022 (Exhibit C.1), the project was assessed in the Project EIR; and pursuant to CEQA Guidelines, Sections 15162 and 15164, that no subsequent or supplemental EIR, or negative declaration is required for approval of the Proposed Project.

2. **Conduct** a public hearing on the Proposed Project as described in this Staff Recommendation Report;

3. **Approve** the Staff Recommendation Report as the Commission Report and **recommend** the Council **adopt** the Findings in the Staff Recommendation Report.

4. **Approve** and **Recommend** pursuant to Section 12.32 F of the Los Angeles Municipal Code (LAMC), that the City Council **adopt** the proposed zoning ordinance to make the zone changes as shown in the Proposed Zoning Map in Exhibit A.2 and pursuant to 12.32 and 13.14 adopt the ordinance to amend the South Los Angeles CPIO, as shown in Exhibits B.1, B.2, and B.4.

5. **Find** that in accordance with LAMC 13.14 C.5, the proposed amendments to the map figures and supplemental development regulations of the South Los Angeles CPIO District (Exhibits B.1, B.2, and B.4) are consistent with, and necessary to implement the programs and policies of the South Los Angeles Community Plan.

6. **Instruct** the Department of City Planning to finalize the necessary zone ordinances to be presented to the City Council, and authorize the Department of City Planning to make non-substantive text edits as necessary to correct typographical or formatting errors, including any non-substantive corrections to the map figures.

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# TABLE OF CONTENTS

**Project Analysis……..A-1**

Project Summary
Background
Components of the Proposed Project
Discussion of Key Issues
Recommended Revisions to the Proposed Project

**Findings……F-1**

City Charter Findings
LAMC Findings
General Plan Findings
Other Findings
Summary of CEQA Findings

**Public Hearing and Communications……P-1**

**Exhibits:**

A – Proposed Zone Change Ordinances
A.1 Existing Zoning Map
A.2 Proposed Zoning Map

B – Proposed Amendments to the South Los Angeles CPIO District Ordinance
B.1 Proposed CPIO Text Amendments
B.2 Proposed CPIO Chapters I, III, V and Appendix B (Full Text)
B.3 Existing CPIO Subareas Figure Maps
B.4 Proposed CPIO Subareas Figure Maps

C – Environmental Clearance
C.1 Draft Addendum to Certified EIR

D – City Council File 20-1265
D.1 Council Motion
D.2 Report to Council PLUM Committee

E – Council District 8 Letter to Department of City Planning dated August 31, 2021 requesting an immediate solution within 12 months.

F – Neighborhood Analysis Maps
F.1 - NANDC Task Force Demolition Permit Assessment Map
F.2 - Eligible Historic Resources Map
F.3 - Visual Survey
F.4 - RSO Units Map
F.5 - HCA Report

# PROJECT ANALYSIS

## Project Summary

The Proposed Project will amend the South Los Angeles Community Plan Implementation Overlay (CPIO) District to strengthen neighborhood stability, promote the preservation of affordable housing, and encourage equitable housing opportunities along select transit-oriented development corridors.

The South Los Angeles CPIO amendment involves: 1) expanding the Residential Subareas of CPIO Chapter V to include additional residential neighborhoods; and 2) amending Chapter V development standards and including new applicability provisions that incorporate existing state law residential development standards as set forth by the Housing Crisis Act of 2019 (collectively, Senate Bill (SB) 330 and SB 8), and further enhance replacement requirements with some above the state level requirements within a new CPIO "Protected Unit Area"; and 3) amending Transit-Oriented Development (TOD) Subareas to upgrade access to bonus incentives for certain nodes along TOD corridors. The amendment is packaged together with a zone change to apply the R1R3 Rear Mass Variation to two R1 zoned neighborhoods within the Proposed Project area.

The proposed South Los Angeles CPIO amendment will apply to a limited geographic area within the South Los Angeles Community Plan area referenced within the CPIO text and Residential Subarea figures as the "Protected Unit Area" (Exhibit B.4).

## Background

On January 12, 2020, the Los Angeles City Council adopted a motion (CF 20-1265) instructing the Department of City Planning (DCP) to report to the Planning and Land Use Management (PLUM) Committee with recommendations relative to the study of the North University-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) Supplemental Use District (SUD) to address the loss of 'naturally occurring affordable housing', due to number of factors including increased demolition of older housing stock and student co-living developments, among other issues (Exhibit D.1). On August 31, 2021 Council District 8 submitted a letter requesting an immediate solution within 12 months (Exhibit E). DCP responded with a recommendation report which outlined a work program to address short-term priorities and long-term goals with a two-phased approach that expedited a work program with a target completion of 12 months in the first phase and an additional 30 to 40 months for the second phase contingent upon staffing resources and funding. The DCP recommendation report was transmitted to the Los Angeles City Council and approved on January 12, 2021 (Exhibit D.2).

The City Council's approval of the DCP recommendation report instructed the DCP to finalize Phase I within a year requesting, in particular, that the existing Neighborhood Stabilization Overlay (NSO) be adapted to better address displacement, loss of naturally occurring affordable housing, and the proliferation of student housing and co-living facilities through geographic expansion utilizing the best existing and/ or new planning and land use tools available.

As part of Phase I, the DCP, with the assistance of the Los Angeles Housing Department (LAHD) and Los Angeles Department of Building and Safety (LADBS), and in consultation with the Office of the City Attorney, was instructed to prepare the necessary staff recommendation report with data analysis, and any Ordinance(s) to implement all recommended land use regulations, the necessary environmental clearance; and, to conduct all necessary public hearing(s) and community outreach. In accordance with Council instructions, the Department joined meetings with community experts and leaders from an established Empowerment Congress North Area Neighborhood Development Council (NANDC) working group to receive feedback about issues

of concern in the project area. The working group, known as the NANDC Demolition Task Force, and other community stakeholder groups such as the USC Forward Coalition, a coalition of established community-based organizations including SAJE, ACCE, SCLC, among others, provided comments and recommendations to the City around the loss of naturally occurring affordable housing, the overconcentration of student housing, and enforcement of construction and design regulations.

Over the course of the last 10 months, an in-depth discussion of the existing conditions and zoning of the project area was studied. Residential neighborhoods within the study areas currently have fewer regulations that pertain to design standards while also allowing for more density than what is currently built out. This has led to mostly by-right residential development that is sometimes incompatible with the established neighborhood scale and design and, in the northern portion of the study area, often designed to exclusively serve the student population. The combination of existing conditions and current zoning has also compounded concerns about affordable housing, parking and other issues as further discussed in this report.

**Components of the Proposed Project**

***South Los Angeles Community Plan Implementation Overlay (CPIO)***

The first phase of the Proposed Project responds to the immediate community concerns regarding displacement and the preservation of affordable housing around the University of Southern California (USC) campus by applying existing South Los Angeles CPIO subarea regulations to additional residential neighborhoods in the Proposed Project area. These regulations would immediately address design and compatibility concerns as well as add new tenant protection provisions to the CPIO regarding unit replacement requirements and right of return that would codify SB 330 and SB 8 provisions into the base zoning, since many of those protections potentially expire by 2030 under current state law.

The South Los Angeles CPIO first became effective in December 2018 following the adoption of the South Los Angeles Community Plan. The CPIO implements the South Los Angeles Community Plan by tailoring development regulations in order to enhance the unique characteristics of neighborhoods while accommodating growth at preferred locations, mainly in transit-oriented development areas located adjacent to light rail and major bus route corridors. The CPIO established four thematic subarea types (Corridors, Transit-Oriented Development, Industrial, and Residential) with varying levels of regulations related to building design, permitted land uses, and, in some cases, tailored incentives for 100% affordable housing and mixed-income housing to support the production of a full range of housing development.

For the Proposed Project, two existing South Los Angeles CPIO subareas are to be amended as part of Phase I:

***Residential Subareas***

The proposed amendments promote neighborhood stabilization and conservation by applying new development standards to interior residential neighborhoods while also enhancing the level of protections available to tenants. Applicability of tenant and replacement unit provisions for Residential Subareas are outlined in Chapter V Section V-1 C of the draft ordinance as noted in Exhibit B.1.

Residential Subareas strengthen residential neighborhood stability and guide new infill residential development to be consistent with prevailing neighborhood building character. For all Residential Subareas, projects must meet existing CPIO design standards for front façades, front yards, roof forms, and building materials. There are currently three Residential Subareas in the South Los

Angeles CPIO: Legacy Single-Family, Multi-Family, and Character Residential. Subarea M: Legacy Single-Family includes standards for new projects or additions to preserve the character of low-density neighborhoods. Subarea N: Multi-Family includes standards for all new infill development that improve aesthetic quality and livability of low-medium to medium density neighborhoods. Subarea O: Character Residential includes standards for all new infill development to better complement the historic character of the surrounding neighborhood. The overall intent of these development standards is to shape multiple levels of residential form and scale while allowing and supporting additional density, such as accessory dwelling units, duplexes, or triplexes as permitted by the base zoning. The existing zoning regulations for density, floor area, and height are not decreasing.

The Proposed Project area includes a variety of residential zones including R3 (medium multi-family), RD1.5 and RD2 (low-medium multi-family), and R2 (low-medium duplex). This existing underlying zoning will remain unchanged. However, some residential neighborhoods within the proposed Protected Unit Area that were not initially identified in the CPIO will be designated within one of the three available CPIO Residential Subareas to provide for additional measurable design standards in the following categories: Legacy Single-Family, Multi-Family, or Character Residential. This application addresses long standing concerns related to new infill development and its impact on prevailing neighborhood character. (See Exhibit B.4 for specific geographic application of the three Residential Subareas)

In addition to the application of the CPIO Residential Subarea standards, a demolition and permit delay is proposed for projects where an existing structure is more than 45 years old within a limited geography inside the CPIO Protected Unit Area (above MLK Blvd. only). The purpose in applying demolition delay is not to impede development that meets objective zoning standards, but to ensure that lots do not sit vacant while a project approval is pending. This proposed requirement is in response toa consistent request from the community to help address neighborhood stability due to the upward trend in demolitions specifically in this geography (Exhibit F.1).

*R1 Variation Zone*

The CPIO Character Residential Subarea would also be applied to two R1 (low one-family) zoned neighborhoods (greater Fenway Park tract and Vermont Avenue Villa tract) proposed to be zoned R1R3 (Rear Mass Variation). Application of the R1R3 Variation Zone provides more tailored regulations to new single-family development and additions to existing single-family dwellings than the standard R1 zone with the intent of ensuring compatibility with the existing built environment and preserving neighborhood character. This modification does not constitute a change to the underlying R1 zoning density nor the Low II Residential general plan land use designation.

***Housing Crisis Act of 2019 and 2020***

Although there are concurrent citywide efforts to update the zoning code and housing policies that include addressing affordable housing production and preservation, the Proposed Project work program would be focused on amending the South Los Angeles CPIO. Any work program by the City must comply with state law. The Housing Crisis Act of 2019 (collectively, SB 8 and SB 330) requires certain residential development projects to achieve ‘no net loss’ in residential units; replace certain types of “protected” residential units; and provide certain occupant protections. Furthermore, new zoning development standards that limit the scale, size, and density requirements would need to be considered with accompanying zoning intensity increases in order to off-set the possible loss of housing capacity.

The proposed amendments memorialize the tenant protections of the Housing Crisis Act and, as authorized by state law, enhances these protections. Existing replacement requirements per the

Housing Crisis Act require residential development to achieve “not net loss” meaning residential projects must replace at least the same number of units existing on a site prior to development. Certain units are deemed protected (Protected Units) as defined by state law, and include those which are (1) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; (2) subject to any form of rent or price control through a public entity’s valid exercise of its police power within the 5 past years; (3) rented by extremely low, very low, or low income households; or (4) withdrawn from rent or lease per the Ellis Act, within the past 10 years.

Protected Units are treated to a higher standard of replacement to preserve existing affordable housing. The proposed amendments further expand requirements for the replacement of Protected Units in the “Protected Unit Area” beyond matching the number of bedrooms per unit to matching at least the same floor area as the Protected Unit it is replacing. In the absence of floor area documentation, the proposed amendments increase the state standard by setting default replacement requirements. The default floor area would be required to be at least the average unit size of a comparable Protected Unit within the CPIO’s Protected Unit Area.

Similarly, existing replacement requirements per the Housing Crisis Act require that the replacement of Protected Units also match the affordability level of the unit it is replacing based on occupant income documentation. In the absence of occupant documentation, the state standard defaults to the percentage of extremely low, very low, or low-income renters within the City as determined by the latest U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) database. To the extent allowed by state law, the proposed amendments increase the state standard by setting the default to the extremely low-income level acknowledging that the median household income in the South Los Angeles CPA is currently $38,295, compared to the citywide household income of $62,142 (American Community Survey 2015-2019).

Table 1 summarizes the differences between the state replacement requirements and the replacement requirements proposed for the South Los Angeles CPIO Ordinance. Although these state laws are already implemented by the City of Los Angeles, with a sunset year of 2030, the Proposed Project incorporates these existing provisions into the regulations of the South Los Angeles CPIO thereby making them a permanent benefit for this geography. Specifically, it should be noted that these enhanced provisions are only applicable in the CPIO Residential Subareas within the Protected Unit Area.

| Table 1: Enhancements to State Requirements in CPIO Protected Unit Area | | |
|---|---|---|
| | ***State Requirements*** | ***Proposed CPIO Requirements*** |
| ***No Net Loss*** | Residential projects must replace at least the same number of units existing on a site prior to development | No change |
| ***Replacement of Protected Units - Size*** | Must be replaced with a unit that has an equivalent number of bedrooms* | Must be replaced with a unit that has an equivalent number of bedrooms* and bathrooms and at least comparable floor area, if no floor area documentation is available, then default to comparable protected unit size |
| ***Replacement of Protected Units - Affordability Level*** | Must be replaced with a unit at an affordable cost, if no income documentation available, then default to citywide affordability levels | Must be replaced with a unit at an affordable cost, if no income documentation available, then default to *extremely low-income levels* |
| *Up to 3 bedrooms. If the unit was a single-family unit with more than 3 bedrooms, then only 3 bedrooms are required to be replaced. | | |

Another component of the Housing Crisis Act limits a jurisdiction's ability to take actions that would result in the loss of residential development capacity without also concurrently making changes to standards, policies, or other conditions within the same jurisdiction that would ensure that there is no resulting net loss. The proposed amendments adjust for this potential net loss incurred by the application of the CPIO Residential Subareas with adjustments and upgrades to the bonus incentives along CPIO TOD Subareas.

***Transit-Oriented Development Area Upgrades***

Major corridors and TOD areas within the Proposed Project area are zoned C2 (commercial) allowing a mix of uses including residential and commercial to densities, heights and FARs defined by the underlying zone Height District and CPIO Development Standards. The South Los Angeles CPIO includes Transit-Oriented Development (TOD) Subareas to promote well-designed, pedestrian-oriented projects that are appropriate to the scale and context of each specific transit neighborhood. Use regulations promote the establishment of much needed uses as well as incentivize 100 percent affordable housing and mixed-income housing projects to be built near transit. There are currently four TOD Subareas in the South Los Angeles CPIO: TOD Low, TOD Medium, TOD High, and TOD Regional (TOD Regional is currently not actively applied in the CPIO). The proposed amendment will upgrade bonus floor area incentives in select TOD Subareas to comply with the 'no net loss' provision of the Housing Crisis Act and balance the application of the CPIO Residential Subareas building step-back and design standards applied to properties in the CPIO expansion area.

In this regard, the potential loss in housing floor area will be accommodated along adjacent corridors and nodes by applying a higher TOD designation, including TOD Regional, to parcels currently designated TOD Low, TOD Medium or TOD High. This increase in designation will result in a higher bonus FAR. (See Exhibit B.1 for upgrades to FAR bonus incentives). In addition to the affordable housing applicability regulations currently in Chapter III (TOD Subareas), the newly designated TOD Regional Subareas will furthermore be required to provide replacement units in addition to any required restricted affordable units with at least 30% of all units in developments larger than 5 units providing 2 or more bedrooms.

The Proposed Project accommodates the growth in housing and jobs by 2035 in the area, as originally analyzed by the certified Environmental Impact Report (EIR) for the South Los Angeles and Southeast Los Angeles Community Plan updates, with the shift in buildable square footage analyzed as part of a draft Addendum to that certified EIR (Exhibit C.1).

**Discussion of Key Issues**

***Neighborhood Stabilization***

The neighborhoods surrounding the USC campus and Exposition Park have been the focus of numerous planning studies and initiatives over the years as the need for housing diversity, affordability, and availability intensify citywide. Despite the City's history of racial segregation through land use practices such as restrictive covenants, this area is notable for its enduring racial and ethnic diversity even during the pre-war era. As increasing numbers of Blacks were drawn to Los Angeles by the promise of jobs and homeownership, and as an historically 'redlined' area, homeownership for working families of color could only be pursued under limited loan (C and D grade) practices. Finding a place to reside in the City was therefore, often hard fought, in particular by lower income Black and Latinx families, and remains a continuing struggle for all marginalized communities who continue to call this area home. Black and Latinx renters face increased displacement pressures due to a variety of market forces, which includes the increased demand for student housing to serve the USC student population. Over the past decade, student enrollment at USC has increased by over 33% from 37,000 in 2011 to 49,500 in 2022. Due to a shortage of student housing institutionally provided by USC, nearby housing occupied by lower-income community residents is increasingly demolished or altered to meet the needs of students. Between 2018 and 2020 there was an average of 35 Ellis Act evictions per 10,000 housing units surrounding USC, compared with an average rate of 9 Ellis Act evictions per 10,000 housing units citywide (according to the USC Housing Dashboard)[1]. With the rising cost of housing in the areas, most displaced tenants cannot afford to remain and may face increased risk of homelessness.

*CPIO Standards as Barriers to the Development of Affordable Housing.*

Comments from key development community stakeholders indicated a deep concern that the proposed CPIO Residential Subarea regulations run counter to the original motion and the proposed amendments would become barriers to the development of affordable housing. In particular, concern that the proposed replacement unit provisions go beyond state law and that in requiring a 'like-for-like' replacement unit square footage, including number of bathrooms in addition to bedrooms, the proposed amendment would reduce the feasibility of new affordable and workforce housing resulting in fewer units and also impeding the emergence of innovative housing typologies.

[1] Source: https://uscneighborhooddata.org/. The USC Area Housing Dashboard was created through a partnership between USC Neighborhood Data for Social Change and the Los Angeles Housing Department. The USC Area Housing Dashboard is a product of community interest and advocacy, and its purpose is to inform community members, community-based organizations and local policymakers of housing trends in the community surrounding USC.

The historical character and diverse housing typologies of the neighborhoods surrounding the USC campus and Exposition Park continue to serve as areas of ample older rent restricted residential properties. The proposed amendment aligns with state law and memorializes the tenant protections of the Housing Crisis Act (HCA). Nothing in the HCA precludes the adoption of affordable housing requirements [CA Gov. Code Section 66300(j)] if substantial evidence is provided. Consistent with the policy direction set forth in the City's Housing Element, the upgraded corridor TOD subareas of the Proposed Project continue the existing CPIO Affordable Housing Incentive Program that both meets and exceeds the affordable housing set-asides prescribed under other density bonus programs (e.g., TOC). In this regard, the Proposed Project's tenant protection, replacement requirements and development standards that apply to the new "Protected Unit" residential areas, are not at odds with the City's goals to address housing needs and should be viewed as a balanced approach that honors the community's desire to retain the area's established sense of place and access to a better quality of life. The Proposed Project continues to implement the policy vision of the adopted South Los Angeles Community Plan to conserve established residential neighborhoods, and prioritize affordable housing growth and economic development along commercial mixed-use corridors and nodes well served by transit options. Additionally, the proposed project continues to offer options for applicants to choose an incentive pathway such as Density Bonus, TOC, or CPIO incentives as approved with the adoption of the South Los Angeles Community Plan and CPIO.

*Additional Tenant Protections*

While tenant protections have been the subject of numerous citywide housing policy initiatives, within the Proposed Project area, four general policy areas of interest with respect to displaced tenants were highlighted. These include relocation benefits, the right to return (or right of first refusal), and remedies for tenants to strengthen the enforcement of tenant protections in addition to anti-harassment measures to hinder attempts to unlawfully displace or harass tenants. In close consultation with the LAHD, these policy areas were analyzed in relation to existing regulations including the Rent Stabilization Ordinance (LAMC Chapter XV, Section 151.00), the Tenant Habitability Ordinance (LAMC Chapter XV, Article 2), the California Housing Crisis Act (Senate Bill 330, Senate Bill 8, LAMC Chapter IV, Article 19) and the Anti-Harassment of Tenants Ordinance (LAMC Chapter IV, Section 151.33).

*Relocation and Right of First Refusal*

Most multi-family properties in the Proposed Project area are subject to the City's Rent Stabilization Ordinance (see Exhibit F.4) which in the event of no-fault evictions, requires the filing of a "Landlord Declaration of Intent to Evict" with LAHD and payment of relocation assistance to tenants prior to eviction. Under the HCA, low-income occupants are required to receive relocation assistance and a right to return to the new development. These benefits are referenced in the proposed amendments to the South Los Angeles CPIO in the new Applicability section (Section V-1). However, the current amount of relocation assistance may not be sufficient to allow existing low-income occupants to remain in their neighborhood or prevent their households from becoming overly rent burdened when seeking replacement housing and/or waiting to exercise their right to return. To address the issue, the City Council recently adopted a motion (Council File No. 17-1054-S2) instructing further study in the Project Area to enhance relocation benefits.

With regard to the procedural aspects of relocation benefits, the proposed amendments to the South Los Angeles CPIO make reference to the requirements for project applicants to develop, submit, and adhere to an approved relocation plan which requires a determination issued by LAHD prior to the issuance of any building permit for projects in a CPIO Residential Subarea (Chapter V, Section V-1 C). Other tenant protections available in the City are referenced in a

proposed Appendix B: Tenant Protections Resources in the CPIO (Exhibit B.1). LAHD currently administers other relocation assistance programs such as those prescribed by the Rent Stabilization Ordinance and the Tenant Habitability Ordinance. Since the enactment of Senate Bill 8 this year, which applied the provisions of the HCA to all by-right residential development in the City, LAHD has been working to implement a relocation process via an SB 8 Replacement Unit Determination Application. By reference, the CPIO memorializes this requirement (beyond the 2030 sunset date in the law). The broad language, which reflects a clear policy intent, allows LAHD to create the necessary implementing procedures (such as a plan approval process and noticing procedures) without requiring continual amendments to the CPIO itself. This is a common practice for many other housing ordinances in the City. The replacement obligations and the right to return obligations established by local and state law are enforced through the required affordable housing covenant, which is filed and monitored by LAHD.

*Remedies and Enforcement*

While the HCA does not include specific language for remedies, wrongful evictions in the City provide a pathway for private right of action. Specific remedies for non-compliance of the other tenant protections listed in the proposed CPIO text are not currently included for this phase of the work program. However, in terms of existing provisions that aid in the enforcement of CPIO provisions, applications submitted in compliance with the South Los Angeles CPIO undergo an administrative review process which clears a project for building permits, per LAMC Sec. 13.14. The violation of actions taken by the Department, which include the approval of development plans in compliance with the CPIO, constitute a violation of the Zoning Code. Enforcement of violations are enumerated in LAMC Sec. 11.2.

*Tenant Anti-Harassment*

The recently enacted Tenant Anti-Harassment Ordinance established a private right of action for tenants experiencing harassment (as defined in the ordinance) and it specifies the civil penalties that tenants can collect. However, it does not prohibit properties or owners with harassment claims or convictions from developing housing.

*Retention of 'Naturally Occurring Affordable Housing'*

As discussed previously, community stakeholders consistently raised awareness of the need to strengthen neighborhood stability in terms of residents' ability to remain in place by limiting the pace of demolition of older housing stock. The project area faces a shortage of housing at levels that are affordable to a majority of existing residents. These areas have an existing supply of 'naturally occurring affordable housing' (NOAH), which typically refers to older residential rental properties that maintain low rents without government subsidy. These units are particularly susceptible to losing their affordability after being sold and rehabilitated. Thus, the redevelopment of NOAH units and rising rents of newer units are contributing factors to the displacement of longtime residents, families, and other multi-unit households of the area.

The NANDC Taskforce worked to collect demolition permit activity within their neighborhood council area (Exhibit F.1). This data was mapped and made available to the public and was discussed at length over the course of several months. This community-led effort, as well as testimonials from community members speaks to the urgency to delay demolition permits for projects that have not received Planning Department approval. The Community Impact Statement submitted for the Public Hearing by the NANDC further states,

> *"The rampant demolition of historic homes has started the painful erosion of the community's character. The replacement housing has been targeted towards the high rent*

*student housing market, resulting in the displacement of long-term residents, the loss of affordable housing units and an overconcentration of student housing with incompatible design elements in a residential community."*

As outlined in the CPIO proposed amendments in Section V-1 D, the project area north of Martin Luther King Blvd. within a CPIO Residential Subarea in the Protected Unit Area is proposed to be subject to demolition and permit delays with certain health and safety exemptions.

*Co-Living and Student Housing*

Due to its proximity to the USC campus, there is a strong market demand for student housing in much of the Protected Unit Area of the Proposed Project. The need for more affordable student housing has created a demand for typologies like shared housing or co-living which results in many co-living facilities in the area directing their marketing towards students. Co-living facilities are a growing housing trend that involves shared or group housing for three or more unrelated individuals, often with shared interests or intentions, with shared interior common areas including a kitchen, dining room, and/or living room. Co-living may be difficult to differentiate from other types of student housing arrangements in the area, which often include roommates sharing multiple bedrooms and common areas. These types of living arrangements can provide occupants who rent individual rooms with a variety of combined amenities and services which may come within a lower price point than renting an entire dwelling unit, making it an attractive option for students.

The proposed amendments to the South Los Angeles CPIO do not involve providing a definition for co-living facilities, nor do the amendments include adding additional provisions to regulate co-living facilities specifically. However, the proposed changes to the CPIO may affect the future development of co-living facilities by altering the building envelope of new development with the application of the CPIO Residential Subarea development standards, enhancing the design compatibility of future development. Further, the proposed Applicability section (Chapter V, Section V-1), which incorporates existing state law (in addition to the proposed enhancements), requires replacement of the demolished square footage of Projected Units in new projects which will carry over at least the same existing unit sizes, dissuading infill development with smaller units. This may not necessarily preclude new co-living facilities from being developed, but it will contribute to the maintenance of the unit size mix.

A motion adopted by the City Council (Council File No. 21-0665) recently instructed the DCP to undertake a citywide effort to define and enumerate the use to allow it in more places given the demand for more affordable housing typologies. This direction aligns with the recently adopted Housing Element of the General Plan, which calls for the expansion of innovative, more affordable by design housing types (see Program 62). In addition, policy Objective 4.1 of the Housing Element calls for ensuring that housing opportunities are accessible to all residents without discrimination on the basis of City of Los Angeles protected status categories, which include (among others) family status, age, source of income and student status. These considerations are particularly significant for areas closer to university or college campuses. Further study will assist the DCP in determining how to best move forward with defining and regulating the use in the City in a way that balances the various policy issues. Phase 2 of this work program could carefully consider these factors in order to determine how to move forward with appropriate regulations.

***Neighborhood Conservation***

Staff affirms the City's commitment to Affirmatively Further Fair Housing consistent with the objectives, policies and implementation programs of the Plan to House LA (2021-2029 Housing

Element) and best practices in emerging zoning reform, however, in working with the NANDC Demolition Taskforce and in reviewing demolition permit data, staff has confirmed that the residential areas of the Proposed Project and the greater South Los Angeles planning region continue to be targeted for a particular type of 'cookie-cutter' speculative development due to availability of lower-priced or foreclosed single-family homes in historically marginalized lower density neighborhoods. The Proposed Project area has generally served the housing needs of the City featuring exemplary early examples of 'missing middle' housing typologies and consistent with Housing Element Policy 1.3.1, housing capacity, resources, policies and incentives that include Affordable Housing in residential development, should be prioritized particularly near transit, jobs, and in Higher Opportunity Areas of the City.

*Incompatible Infill Development*

As discussed in the June 2017 City Planning Commission Report for the South LA Community Plan Update, a community concern of increasing urgency within R2-zoned neighborhoods was the intrusion of by-right, two-story duplexes that are incompatible with established neighborhood characteristics and create significant quality of life and aesthetic conflicts within these residential areas. Numerous comments from residents and certified neighborhood councils raised concerns with the out-of-scale, 'stucco box' design of these projects and the overwhelming number of cars parked along streets. (Exhibit F.3)

These duplex projects, which in the north area are often student co-living projects, circumvent the prevailing development pattern of the R2 zone, building out to the full zoning envelope to accommodate two units with four or five bedrooms each (for a total of up to ten bedrooms on each lot) on parcels that previously contained single-family homes or small, one-story duplexes. Because there are technically only two units, the projects are only required to provide four on-site parking spaces for a project consisting of 10 bedrooms. As further discussed in the 2017 Commission Report for the South LA Community Plan Update, residents that live near or adjacent to this type of development state that they have been blocked in or out of their driveways on many occasions and witnessed conflicts amongst the residents as cars in the driveway are blocked in by other vehicles. Staff acknowledges that these new developments do provide additional housing in the community, in particular when accessory dwelling units (ADU) are included, and staff further acknowledges that with the recent passage of Assembly Bill 2097, minimum off-street parking may no longer be required for many of these projects.

Additionally, community members from the United Neighborhoods Neighborhood Council (UNNC) area directly to the west of the Proposed Project area raised concerns regarding the removal of existing mature trees during the construction of new infill projects and reaffirmed the need for continued oversight by the Urban Forestry Division (UFD) of all tree related activity in alignment with City Council Motion 15-0499-S2 and other city related tree considerations, including working with applicants to provide an initial site assessment to evaluate and document the presence of existing trees.

The Proposed Project's application of CPIO Residential Subarea M (Legacy Single-Family) reflects the continuation of the adopted Community Plan's "neighborhood conservation" efforts and combined with the application of Subarea O (Character Residential), and Subarea N (Multi-Family), as well as the application of R1R3 (R1 Variation Zone) to two R1 (single-family) zoned neighborhoods, will further address incompatible development trends as well as the quality of life issues facing the residential areas of the Proposed Project.

*Eligible Historic Resources*

The North Area Neighborhood Development Council (NANDC) and United Neighborhoods

Neighborhood Council (UNNC) requested modifications to the proposed ordinance, namely that the definition of an “Eligible Historic Resource” as currently defined in Chapter I-4 of the CPIO be amended. The requested definition would classify any structure that is 60 years old or older as an “Eligible Historic Resource.” After studying this proposal, staff does not recommend this change to what qualifies as an “Eligible Historic Resource.”

This request would classify any building built before 1963 as an “Eligible Historic Resource.” Since the development period for the area dates back to the late 19th century, this proposed change would apply to the vast majority of buildings in the Proposed Project area. Under this request any project whether it involves demolition or not would require compliance with the CPIO Eligible Historic Resource Evaluation procedures of Chapter 1. Pursuant to CPIO Section I-6.C.5 an Eligible Historic Resource is a building, structure, object, site, landscape, natural feature, or historic district identified as eligible for listing either individually, or as a contributor to an eligible historic district under a local, state or federal designation program, through SurveyLA, or another historical resource survey accepted as complete by the Director. This definition of “Eligible Historic Resource” was crafted to capture places that had been previously identified as potentially historic, while also providing an opportunity to accept future historic resources surveys as they were completed.

SurveyLA is the official historic resources survey for the City of Los Angeles. During the establishment of the CPIO, as part of the South Los Angeles Community Plan Update process, the definition of Eligible Historic Resources was refined to acknowledge that SurveyLA would be updated over time based on the inclusion of additional surveys and on-going maintenance of the survey database. In this regard, SurveyLA should always be considered a ‘living survey’. This process is enshrined in the definition of Eligible Historic Resources and the CPIO approval procedures in Chapter I. There is community interest in conducting an updated survey of the Proposed Project area and staff is supportive of such an effort. At this time, funding has not yet been identified to complete a survey of the entire area. The expansion of the CPIO Residential Subareas to an additional approximately 1.6 square mile area of the South Los Angeles CPIO’s current 2.5 square mile reach reflects a significant step to protect even more Eligible Historic Resources. Refer to Exhibit F.2 to view additional historic resources that may become subject to the CPIO provisions. Combined with the proposed demolition delay requirement and other provisions aimed at the retention of naturally occurring affordable housing, staff find that the request to change the definition of Eligible Historic Resource is unnecessary. The proposed CPIO amendments as recommended by staff address the majority of concerns raised by the community on how to protect historic resources and existing affordable housing.

*Additional Survey Work*

The community has requested that additional survey work be completed for the Community Plan Area to increase the number of Eligible Historic Resources. Following the approval of Council Motion CF 22-1265 directing staff to move forward with Phase I of the project, City Planning staff met regularly with the NANDC Demolition Task Force and a representative from USC in efforts to initiate an historic resources survey to identify additional eligible historic resources within the Protected Unit Area of the Proposed Project. A Request for Proposal (RFP) to retain a survey consultant team remains in process.

***Continued Vision for Transit-Oriented Development Areas***

Consistent with the goals, policies and programs of the adopted South LA Community Plan, mixed-income and 100 percent affordable housing at major transit stops within the Protected Unit Area increase the supply of housing, particularly affordable housing, at transit centers supporting goals of reducing traffic, improving air quality, reducing greenhouse gas emissions, and alleviating

development pressure in residential neighborhoods. Furthermore, it ensures that populations most likely to utilize public transit have access to public transit options.

*Community Benefits within upgraded TOD areas*

With the previous plan update, the voices of community stakeholders focused on ensuring the intensity of TOD areas reflected both the historical context of the area while accommodating much needed affordable housing and economic development to improve the quality of life for community residents. With this current round of community outreach, strengthening neighborhood stability and neighborhood conservation were of such importance that community leaders were willing to accept an approach to allow greater intensity in upgraded TOD subareas in compliance with the HCA's 'no net loss' requirement and thereby shifting intensity from adjacent residential neighborhoods to TOD corridors consistent with the vision of the Community Plan. The community's acceptance of this trade-off however came with requests to further prioritize affordable housing in these upgraded TOD areas. Therefore, the Proposed Project clarifies that replacement of demolished units should not be counted toward the required CPIO Affordable Housing Incentive Program set-asides and instead be in addition to the Extremely Low, Very Low and Low income set-asides required by the CPIO Program. In this regard, replacing existing affordable units in addition to requiring the CPIO Program's TOC Tier 4 level equivalent set-asides would result in a net-gain of additional affordable units in these transit-rich areas of the Proposed Project area.

*Prioritize community-serving uses*

Additional concerns were raised regarding current incentives for hotel uses in both the TOD High and TOD Regional CPIO subareas. Since the TODs within the Proposed Project area are being enhanced to, in part, comply with state law (HCA), several community stakeholder groups and community members voiced arguments in favor of prioritizing affordable housing projects over hotel uses, recognizing that while economic development of commercial uses remains a priority for corridors, those commercial uses should be prioritized for community-serving uses. The CPIO currently includes a definition for Targeted Commercial Uses, which are community-serving uses, and incentivizes these uses with modest FAR increases.

*Prioritize intensity increases for Affordable Housing*

The Proposed Project creates increased opportunities for mixed-income housing and neighborhood serving mixed-use developments that include housing at major transit stops in order to promote a greater variety of housing price points that people at different income levels can afford. Mixed-income and 100 percent affordable housing projects are incentivized by the current CPIO in these areas through higher maximum FARs and heights, as well as increased density. The Proposed Project continues the CPIO's established incentive program which does not provide incentives for the construction of 100 percent market rate housing which would continue to be subject to the previous Height District 1 FAR limits in most TOD subareas.

**Other Considerations**

*Phase II - Scope of Project*

Concerns were raised by numerous community members asking that the CPIO expansion area be extended to other neighborhoods throughout the South Los Angeles Community Plan Area and the greater South LA planning region (Southeast Los Angeles, South Los Angeles and West

Adams-Baldwin Hills-Leimert). As discussed in the background section of this report, the City and in particular the DCP and LAHD are currently conducting several studies to further 'right size' affordable housing set-asides by Community Plan area in an effort to implement the Affirmatively Furthering Fair Housing policies of the Housing Element. The Proposed Project reflects a focused Phase I study in response to the Council Motion and the urgency pressed upon DCP to deliver a solution within 12 months. Any subsequent efforts to guide the provision of affordable housing, either through incentive-based systems or inclusionary mandates should be informed by these inter-departmental citywide studies including the DCP Housing Policy Unit's implementation of the Housing Element Rezoning Program pursuant to state mandate.

Furthermore, contingent upon support for future funding and requests for staff resources, the DCP authorized a Phase II update as part of the Council's Motion to look more comprehensively at applying the strategies of this focused Phase I CPIO amendment to the rest of the CPA in combination with the application of the City's New Zoning Code and the ongoing inter-departmental housing related citywide studies and initiatives. When the South Los Angeles Community Plan was adopted in 2017 the New Zoning Code was not yet available. However, the New Zoning Code or comprehensive update known as Chapter 1A of the LAMC - is currently underway. Phase II would examine the entire plan area to ensure consistency with ongoing citywide regulations regarding public benefits, incentive systems, such as revisions to Density Bonus and TOC; and also tailor zoning regulations at the parcel level. As mentioned, this approach would allow for the opportunity to tailor development incentives, development standards, and community benefits, including the refinement of TOC provisions for the area. If adequately budgeted, Phase II is slated to begin next year following the completion of Phase I.

**Conclusion**

As highlighted at the beginning of this Discussion of Key Issues section there are many factors to be considered in addressing the issues impacting the Proposed Project area. The Department has worked for many months with the stakeholder groups, the Council offices and applicable City department staff in developing a balanced approach to land use changes that accommodates both the needs of the City, the development community and those of long-time residents. The proposed ordinance changes seek to achieve neighborhood stability by enshrining and enhancing the tenant protections of the HCA and conserving existing 'naturally occurring affordable housing'. While the ordinance does not explicitly regulate student co-housing nor expand the eligibility threshold for eligible historic resources, it does seek to regulate the exterior form and interior layout (when replacement units are required) for projects in a manner that honors the existing historical context of this cherished area of the City.

## Recommended Revisions to the Public Hearing Draft Ordinance

Review of written comments and verbal testimony received on the draft CPIO amendments through the Public Hearing process identified a number of revisions requested by community stakeholders. Additional staff analysis and inter-departmental review also led to revisions and clarifications to the text of the proposed CPIO amendment, including revisions that align the proposed amendments with other City policies and procedures. DCP and LAHD staff reviewed these requests to ensure the successful implementation of the Proposed Project.

### *Revisions to South Los Angeles CPIO Text (Exhibit B.1)*

*Additional Tenant Protections and Anti-Harassment Provisions*

A new CPIO Appendix B: "Tenant Protections Resources" has been prepared as a resource document that directs applicants to the applicable LAMC sections and LAHD procedures. The topics covered in the new Appendix include:

- *Relocation*
- *Remedies or Private Right of Action*
- *Right to Return or Right of First Refusal*
- *Tenant Harassment*

*Demolition Delay*

In response to comments received by members of the development community, the demolition delay regulation (Section V-1 D) of the Proposed CPIO Ordinance has been clarified to exempt demolitions for health, safety and emergency orders per Code. In addition, per Council District Office 9, new projects south of Martin Luther King Blvd are exempt.

*Commercial Development*

In response to comments received during the Public Hearing process, Table III-3 (FAR and height for 100% commercial projects) of the proposed CPIO amendments has been revised to clarify that the bonus incentives provided exclusively for hotels in the TOD High Subarea do not apply to those parcels upgraded from TOD Medium to TOD High within the boundaries of the Protected Unit Area. Additionally, the Proposed Project involves the first activation of the TOD Regional Subarea in the South Los Angeles CPIO. Height and FAR incentives for hotel, Professional Office, Research and Development and/or Major Retailer uses have been modified to prioritize Mixed-Income and 100% Affordable Housing projects as outlined in Tables III-2 and III-3 of the proposed ordinance.

*Exemptions in the TOD Regional Subarea*

In response to comments asking for clarity on the applicability of the TOD Regional Subarea, changes were made to exempt Supportive Housing, Transitional Housing, senior housing projects, and housing for persons with disabilities from the requirement that at least 30% of all units within the CPIO Protected Unit Area larger than 5 units have 2 or more bedrooms.

*Tree Assessments*

In response to comments received by residents from the UNNC, a new CPIO Section V-3.C.7 has been added to require an initial site assessment to evaluate and document the presence of existing trees prior to an application being deemed complete.

# FINDINGS

## Project Location

The Proposed Project location is approximately 3,366.4 acres (5.26 square miles) located within the South Los Angeles Community Plan Area (CPA). The CPIO District is generally bounded by I-10 (Santa Monica freeway) to the north; the I-110 (Harbor freeway) to the east; Martin Luther King Jr. Boulevard (from Western Avenue to Normandie Avenue), West 62nd Street (from Normandie Avenue to Vermont Avenue) and Gage Avenue (from Vermont Avenue to the Harbor I-110 freeway) to the south; and Western Avenue (from the I-10 freeway to Martin Luther King Jr. Boulevard), Normandie Avenue (from Martin Luther King Jr. Boulevard to West 62nd Street), and Vermont Avenue (from West 62nd Street to Gage Avenue) to the west.

## City Charter Findings

**Charter Section 556 and 558** - Charter Section 556 and 558 require the City Planning Commission and the City Council to adopt the following findings when taking any action to (i) create or change a zone or zoning district created for the purpose of regulating the use of land, or (ii) zoning the permissible uses, height, density, bulk, location or use of buildings or structures, size of yards, open space, setbacks, and other similar requirements, including supplemental use district and specific plan ordinances (collectively zoning ordinances):

(1) The zoning ordinance is in substantial conformance with the purposes, intent, and provisions of the General Plan.
(2) The zoning ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice

Based upon this, the above findings are required for all of the following ordinances which are part of the Proposed Project: (1) the amendments to the City's Zoning Map for (i) the R1R3 zone changes in the South Los Angeles Community Plan area and (ii) zone changes to the South Los Angeles CPIO subarea boundaries, and (2) amendments to regulations in the South Los Angeles CPIO.

The Proposed Project is in conformity with public necessity because it will encourage the production of affordable housing, strengthen neighborhood housing stability, and enhance tenant protections. Neighborhood stabilization and conservation will be achieved by applying new development standards to residential neighborhoods while also enhancing the level of protections available to tenants. The project area has witnessed a significant amount of demolitions and struggles with the maintenance and production of affordable housing, as such the proposed demolition delay and tenant protections included in the proposed ordinance provide general welfare and convenience to residents in the vicinity. The project also addresses issues of neighborhood compatibility by expanding CPIO Residential Subareas and applying the R1R3 Rear Variation Zone to selected parcels in the Proposed Project area. The Proposed Project conforms with good zoning practice in that it balances the protection of affordable housing in lower scale neighborhoods through tenant protections, affordable housing incentives, while upgrading development capacity in select TOD corridors near major transit nodes, improving access to employment, and supporting pedestrian oriented development along selected commercial corridors.

## LAMC Findings

### Los Angeles Municipal Code (LAMC) Section 12.32 C Findings

Implementing Zoning Ordinances must also comply with the procedures in LAMC Section 12.32 C, which provides procedures for zoning ordinances. Section 12.32 C incorporates the Charter

findings in Section 556 and 558. It requires the CPC to adopt a finding that a proposed zoning ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice. The City Council is required to make the same finding before adopting the zoning ordinance, as well as a finding that the zoning ordinance is consistent with the General Plan.

For all of the reasons provided below and based on the whole of the record of proceedings, the adoption of the amendments to the City's Zoning Map for the zone changes in portions of the South Los Angeles Community Plan areas, changes to existing South Los Angeles CPIO boundaries, and amendments to regulations in the South Los Angeles are:

(1) in substantial conformance with the purposes, intent, and provisions of the General Plan.
(2) in conformity with public necessity, convenience, general welfare, and good zoning practice.

The Proposed Project is in conformity with public necessity because it will encourage the production of affordable housing, strengthen neighborhood housing stability, and enhance tenant protections. Neighborhood stabilization and conservation will be achieved by applying new development standards to interior residential neighborhoods while also enhancing the level of protections available to tenants. The Proposed Project area has witnessed a significant amount of demolitions and struggles with the maintenance and production of affordable housing, as such the proposed demolition delay and tenant protections also provide general welfare and convenience to residents in the vicinity. The proposed project is in conformance with the general welfare and convenience of the public by addressing issues of affordability, neighborhood scale and design, and providing additional tenant protections in the new "Protected Unit Area" of the South LA CPIO. The proposed project conforms with good zoning practice in that it balances the protection of affordable housing in lower scale neighborhoods through tenant protections, affordable housing incentives, while upgrading development capacity in select TOD corridors near major transit nodes, improving access to employment, and supporting pedestrian-oriented development along selected commercial corridors.

**General Plan Findings**

**Housing**

With respect to housing, the Framework Element states the following:

Objective 4.3: Conserve scale and character of residential neighborhoods.

Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.

Objective 4.2: Encourage the location of new multifamily housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

Objective 4.4: Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.

With respect to housing, the Plan to House LA (2021-2029 Housing Element) states the following:

*Objective 1.1: Forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.*

*Policy 1.1.2: Plan for appropriate land use designations and density to accommodate an ample supply of housing units by type, cost, and size within the City to meet housing needs, according to Citywide Housing Priorities and the City's General Plan.*

*Policy 1.1.6: Allocate citywide housing targets across Community Plan areas in a way that seeks to address patterns of racial and economic segregation, promote jobs/ housing balance, provide ample housing opportunities, and affirmatively further fair housing.*

*Policy 1.1.7: Incentivize production of mixed-income and 100% Affordable Housing projects by rezoning for more inclusive development at densities that enable their construction in every geography.*

*Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.*

*Policy 1.2.1: Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs.*

*Policy 1.2.2: Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.*

*Policy 1.2.4: Strengthen the capacity of housing providers to build Affordable Housing.*

*Objective 1.3: Promote a more equitable distribution of affordable housing opportunities throughout the city, with a focus on increasing Affordable Housing in Higher Opportunity Areas and in ways that further Citywide Housing Priorities.*

*Policy 1.3.1: Prioritize housing capacity, resources, policies and incentives to include Affordable Housing in residential development, particularly near transit, jobs, and in Higher Opportunity Areas.*

*Policy 1.3.2: Prioritize the development of new Affordable Housing in all communities, particularly those that currently have fewer Affordable units.*

*Objective 3.1: Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.*

*Policy 3.1.3: Develop and implement design standards that promote quality residential development.*

*Policy 3.2.1: Promote the integration of housing with other compatible land uses at both the building and neighborhood level.*

*Policy 3.2.2: Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.*

With respect to housing, the South Los Angeles Community Plan states the following:

*Policy LU1.11: Mixed-Income Communities. Encourage additional mixed-income neighborhoods by promoting affordable housing and reducing residential segregation and concentrations of poverty.*

*Policy LU5.1: Address Diverse Resident Needs. Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2035.*

*Policy LU5.2: Diverse and Affordable Housing. Prioritize housing that is affordable to a broad cross section of income levels, that provides a range of residential product types, and that supports the ability to live near work.*

*Policy LU5.3: Encourage that adequate affordable housing units for senior citizens are developed according to incomes in neighborhoods that are accessible to public transit, commercial services and health facilities.*

*Policy LU5.6: Senior Housing. Locate higher residential densities, senior citizen housing, affordable housing and mixed-income housing, when feasible, near commercial centers, transit stops (e.g., near Expo Line and Green Line station areas) and public service facilities.*

*Policy LU1.10: Minimize Displacement. New development should aim to minimize displacement of current residents.*

*Policy LU1.11: Mixed-Income Communities. Encourage additional mixed-income neighborhoods by promoting affordable housing and reducing residential segregation and concentrations of poverty.*

*Policy LU2.1: Quality Design. Seek a high degree of architectural compatibility and landscaping for new infill development, as well as for additions to existing structures, in order to protect the character and scale of existing single family residential neighborhoods.*

*Policy LU2.2: Preserve Neighborhoods. Maintain existing single-family land use designations throughout the Community Plan Area.*

*Policy LU3.1: Consider Compatibility. Protect existing single-family and low-density residential neighborhoods from encroachment by higher-density residential and other incompatible uses.*

*Policy LU3.2: Appropriate Scale. Proposed development should be designed to achieve transition in scale and be compatible with adjacent single-family neighborhoods.*

*Policy LU3.3: Compatible Design. New development of single-family units should maintain the visual and physical character of adjacent single-family properties in the neighborhood, including the maintenance of front property setbacks, including front yard fence location, design, and materials, modulation of building volumes, and articulation of façades to convey the sense of individual units, and the use of building materials that characterize single-family housing.*

*Policy LU4.1: Architectural Compatibility. Seek a high degree of architectural compatibility and landscaping for new infill development to protect the historical and architectural character and scale of existing residential neighborhoods, including front yard fence location, design, and materials.*

*Policy LU5.1: Address Diverse Resident Needs. Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2035.*

*Policy LU5.2: Diverse and Affordable Housing. Prioritize housing that is affordable to a broad cross-section of income levels, that provides a range of residential product types, and that supports the ability to live near work.*

*Policy LU5.4: Preserve Rent Stabilized Units. Encourage the preservation and maintenance of rental units that are protected by the Rent Stabilization Ordinance and strive for a no net-loss of affordable units in the Plan Area and discourage displacement of existing residents.*

*Policy LU5.5: Housing for Families. Promote family-friendly projects that include residential units of three or more bedrooms suitable for larger families.*

*Policy LU5.6: Locate Density Appropriately. Locate higher residential densities, senior citizen housing, affordable housing and mixed-income housing, when feasible, near commercial centers, transit stops (e.g., near Expo Line and Green Line station areas) and public service facilities.*

*Policy LU5.7: Minimize Displacement. Discourage the displacement of existing residents and strive for a no net loss of affordable housing units, including those protected by the Rent Stabilization Ordinance.*

*Policy LU19.3: Mixed-Income Housing. Incentivize the production of affordable and/or mixed-income housing in Transit-Oriented Districts.*

The above referenced objectives and policies highlight some examples of how the Proposed Project is consistent the General Plan and its Elements. The Framework Element, 2021-2029 Housing Element, and Land Use Element (South Los Angeles Community Plan) set forth a blueprint of City policies that promote housing supply, affordability, accessibility, and design that will accommodate the projected needs of the City's population. Consistent with the above referenced objectives and policies, the Proposed Project as an amendment to the South Los Angeles CPIO zoning tool, further implements the goals, policies and programs of the South Los Angeles Community Plan. The South Los Angeles Community Plan creates capacity to build over 15,000 new housing units for more than 43,000 people over the life of the plan by directing residential growth near jobs and transit, and incentivizing the protection and development of affordable units.

**Residential Neighborhoods**

With respect to residential neighborhoods, the General Plan Framework Element states the following:

*Objective 3.5: Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*

*Goal 3C: Multifamily neighborhoods that enhance the quality of life for the City's existing and future residents.*

*Objective 3.7: Provide for the stability and enhancement of multifamily residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.*

With respect to residential neighborhoods, the 2021-2029 Housing Element states the following:

*Objective 4.3: Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing, particularly in Higher Opportunity Areas, increase place-based strategies to encourage community revitalization and protect existing residents from displacement.*

*Policy 4.3.2: Ensure that all neighborhoods have a range of housing typologies to provide housing options for residents to remain in the same community, when and if their needs change.*

With respect to residential neighborhoods, the South Los Angeles Community Plan (Land Use Element) policies state the following:

*Policy LU5.2: Diverse and Affordable Housing. Prioritize housing that is affordable to a broad cross-section of income levels, that provides a range of residential product types, and that supports the ability to live near work.*

*Policy LU5.6: Locate Density Appropriately. Locate higher residential densities, senior citizen housing, affordable housing and mixed-income housing, when feasible, near commercial centers, transit stops (e.g., near Expo Line and Green Line station areas) and public service facilities.*

*Policy LU2.2: Preserve Neighborhoods. Maintain existing single-family land use designations throughout the Community Plan Area.*

*Policy LU3.1: Consider Compatibility. Protect existing single-family and low-density residential neighborhoods from encroachment by higher-density residential and other incompatible uses.*

*Policy LU3.2: Appropriate Scale. Proposed development should be designed to achieve transition in scale and be compatible with adjacent single-family neighborhoods.*

*Policy LU3.3: Compatible Design. New development of single-family units should maintain the visual and physical character of adjacent single-family properties in the neighborhood, including the maintenance of front property setbacks, including front yard fence location, design, and materials, modulation of building volumes, and articulation of façades to convey the sense of individual units, and the use of building materials that characterize single-family housing.*

The Proposed Project is located in an urbanized area of the City that is transit rich and contains sufficient public infrastructure and services to support existing and future residents. The above referenced goals, objectives and policies illustrate some examples of how the Proposed Project is consistent the General Plan and its Elements. The expansion of the CPIO Residential Subareas including application of the R1R3 (Rear Mass Variation Zone) to two single-family zoned neighborhoods will encourage design that is compatible and maintains established neighborhood characteristics. The proposed tenant protections and provisions of the “Protected Unit Area” of the CPIO will promote neighborhood stability to prevent displacement of long-time residents. Furthermore, the TOD upgrades on select corridors will increase housing capacity near transit to

accommodate projected growth while conserving and enhancing lower density residential neighborhoods.

**Industrial Lands**

With respect to industrial lands, the General Plan Framework Element states the following:

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

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

*Policy 3.14.2: Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).*

With respect to Industrial Lands, the South Los Angeles Community Plan states the following:

*Policy LU14.3 Job Training and Local Hiring. Promote job training, living wage provisions and local hiring for community residents, including individuals facing barriers to employment.*

*Policy LU15.3 Revitalization of Brownfields. Support remediation and reuse of brownfields.*

The above referenced goals, objectives and policies highlight some examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project will encourage a balance of rental market price points that accommodate varying tenant income levels within the area, therefore, providing opportunities for residents with diverse socio-economic skills to support the economic viability of nearby industries located in the industrial lands in the City. The proposed TOD upgrades along select corridors will also facilitate access to jobs and provide job opportunities that will maintain the City's fiscal viability.

**Commercial Areas**

With respect to Neighborhood Districts, the Framework Element states the following:

*Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.*

*Objective 3.8: Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.*

With respect to Regional Centers, the Framework Element states the following:

*Goal 3F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.*

*Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.*

*Policy 3.10.1: Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.*

With respect to Mixed-Use Boulevards, the Framework Element states the following:

*Goal 3I: A network of boulevards that balance community needs and economic objectives with transportation functions and complement adjacent residential neighborhoods.*

*Objective 3.13: Provide opportunities for the development of mixed-use boulevards where existing or planned major transit facilities are located and which are characterized by low-intensity or marginally viable commercial uses with commercial development and structures that integrate commercial, housing, and/or public service uses.*

With respect to commercial areas, the South Los Angeles Community Plan states the following:

*Policy LU5.6: Locate Density Appropriately. Locate higher residential densities, senior citizen housing, affordable housing and mixed-income housing, when feasible, near commercial centers, transit stops (e.g., near Expo Line and Green Line station areas) and public service facilities.*

*Policy LU12.1 Density and Mixed-Use. Locate higher densities and a mix of uses in areas designated community commercial, as appropriate, unless identified as commercial-only.*
*Policy LU12.2 Design for Transitions. The scale and massing of new development along corridors should provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods with lower development intensities and building heights.*

*Policy LU13.5 Promote Mixed-Use Districts. Encourage mixed-use districts that combine a variety of uses to achieve a community where people can shop, live and work with reduced reliance on the automobile.*

*Policy LU13.6 Appropriate Medium-Density Housing. Increase mixed-use housing opportunities by encouraging medium-density residential development, including townhomes and senior housing, where appropriate.*

*Policy LU13.7 Daily Needs Within Walking Distance. Encourage walkability within Neighborhood Commercial areas by fostering a variety of uses that serve the daily needs of adjacent residential areas.*

Within the Proposed Project area, sections of Vermont Ave., Western Ave., Figueroa St, and Martin Luther King Jr. Blvd. are designated, Neighborhood District, Regional Center and Mixed-Use Boulevard on the Framework Element diagram. The Community Plan's general plan land use designation for these areas is Community Commercial. The Proposed Project amendments include CPIO TOD Subarea upgrades along these select areas on Western Ave., Vermont Ave., Figueroa St., and Martin Luther King Jr. Blvd. to promote density and mixed-use development with affordable housing incentives to accommodate growth consistent with both the Framework Element and South Los Angeles Community Plan (Land Use Element) as well as the other Elements of the General Plan, thus supporting surrounding residential neighborhoods and nearby regional destinations by integrating housing with commercial uses.

**Transit Stations**

With respect to transit stations, the General Plan Framework Element states the following:

*Goal 3K: Transit stations to function as a primary focal point of the City's development.*

*Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.*

*Policy 3.15.1 Prepare detailed plans for land use and development of transit-oriented districts consistent with the provisions of the General Plan Framework Element and the Land Use/Transportation Policy.*

*Policy 3.15.2 Work with developers and the Metropolitan Transportation Authority to incorporate public- and neighborhood-serving uses and services in structures located in proximity to transit stations, as appropriate.*

*Policy 3.15.3: Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy 3.1.6.*

*Policy 3.15.4: Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.*

*Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.*

With respect to transit stations, the City's Mobility Plan 2035 (Circulation Element) states the following:

*Policy 3.1 Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City's transportation system.*

*Policy 3.3 Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*

*Policy 3.5 Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.*

With respect to transit stations the South Los Angeles Community Plan states the following:

*Policy LU19.1: Context-Specific Transit-Oriented Districts. Tailor the design, intensity and character for each Transit-Oriented District to promote compatibility with adjacent neighborhoods and to highlight the unique characteristics of the surrounding context.*

*Policy LU19.2: Incentivize Mixed-Use. Develop incentives for higher density, mixed use projects that incorporate a desirable ground floor use, such as a full service grocery store or drug store, in targeted Transit-Oriented Districts.*

*Policy LU19.3: Mixed-Income Housing. Incentivize the production of affordable and/ or mixed-income housing in Transit-Oriented Districts.*

*Policy LU19.4: Housing for Transit Users. Prioritize new housing for transit users and the transit-dependent community.*

*Policy LU19.8: Streetscape Plans. Develop Streetscape Plans that implement complete streets strategies and streetscape improvements for major corridors near TODs that create pedestrian-friendly environments and provide accessibility and connectivity to the stations.*

*Policy LU19.9: Transit Access. Orient new development located near transit to provide direct pedestrian connections to the Metro Station/Platform/Mezzanine wherever possible and encourage projects to provide people-oriented built environment features such as shade trees, bus shelters and bicycle racks or lockers.*

*Policy LU19.12: Minimize Displacement. Discourage the displacement of existing residents and strive for a no net loss of affordable housing units, including those protected by the Rent Stabilization Ordinance.*

In addition to the above referenced goals, objectives and policies that highlight some examples of how the Proposed Project is consistent the General Plan and its Elements. The policies and programs of the adopted South Los Angeles Community Plan as implemented by the Proposed Project incentivizes mixed-income and 100 percent affordable housing at major transit stops within a Protected Unit Area, increasing the supply of housing, particularly affordable housing, at transit centers. The project also supports goals of reducing traffic, improving air quality, reducing greenhouse gas emissions, and alleviating development pressure in residential neighborhoods.

**Walkable Environments**

With respect to walkable environments, the General Plan Framework states the following:

*Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.*

*Goal 3E: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide for Los Angeles' communities.*

*Policy 3.15.4: Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.*

*Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.*

*Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents.*

*Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.*

With respect to walkable environments the South Los Angeles Community Plan states the following:

*Policy LU1.2 Adequate Lighting and Street Maintenance. Encourage safe streets, parks, recreation facilities, sidewalks, and bike facilities by providing adequate lighting and well-kept, paved surfaces.*

*Policy LU8.3 Site Design and Streetscapes. Enhance the public realm in commercial areas by promoting quality site, architectural and landscape design, as well as vibrant streetscapes.*

*Policy LU9.2 Active Streets. Encourage an active street environment along commercial corridors by incorporating commercial or other active public uses along street frontages.*

*Policy M3.1: Pedestrian Access. Encourage walking by orienting building entrances to face the streets and sidewalks when designing access to new developments and buildings.*

*Policy M5.2: Development at Transit Nodes. Facilitate development and public improvements at multi-modal transit nodes or intersections that Metro identifies as major transfer nodes to promote convenient access between new development and the transit system.*

The goals, objectives and policies referenced above are examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project will maintain the public realm experience through enhancements to existing and new housing by expanding the CPIO Residential Subarea standards to additional neighborhoods thereby strengthening efforts to maintain and improve the design of buildings and site features. Within the upgraded TOD areas of the Proposed Project, new development within close proximity of transit stops and the Metro E Line will provide pedestrian amenities and active ground floor spaces that will improve the pedestrian experience, and therefore, encourage the use of transit as a mode of travel, thereby promoting pedestrian activity and strengthening mixed-use centers within South Los Angeles.

**Livable Neighborhoods**

With respect to livable neighborhoods, the Framework Element states the following:

*Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*

*Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.*

With respect to livable neighborhoods, the Plan for a Healthy Los Angeles (Health Element) states the following:

*Policy 1.5 Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.*

*Policy 2.1 Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.*

With respect to livable neighborhoods, the South Los Angeles Community Plan states the following:

*Policy LU1.7 Maintenance and Rehabilitation. Maintain existing residential neighborhoods and support programs for the renovation and rehabilitation of deteriorated and aging housing units.*

*Policy LU20.4 Design Quality. Enhance the design, architectural quality and livability of existing well-established neighborhoods.*

*Policy LU22.2: Compatible Development. Protect neighborhoods from incompatible and out-of-scale development while maintaining the potential to provide additional housing units that accommodate multigenerational households by allowing a second unit behind the original house.*

The objectives and policies referenced above highlight some examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project applies the CPIO Residential Subarea objective design standards to additional residentially zoned areas to maintain 'naturally occurring affordable housing' and shape new construction in a manner that is compatible with established neighborhood design and scale. In addition, the proposed amendment reinforces strong pedestrian-oriented development near transit by upgrading access to bonus incentives for certain TOD nodes to allow for mixed-income housing, thereby also increasing access to jobs and services.

**Historic and Cultural Resources**

With respect to historic and cultural resources, the General Plan Framework Element states the following:

*Goal 3M: A City where significant historic and architectural districts are valued.*

*Objective 3.17: Maintain significant historic and architectural districts while allowing for the development of economically viable uses. With respect to cultural and historic resources, the*

With respect to historic and cultural resources*, the Conservation Element states the following:*

*Conservation Element - Objective: protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.*

*Conservation Element Policy: continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.*

With respect to historic and cultural resources, the South Los Angeles Community Plan states the following:

*Policy LU24.3 Evaluate Potential Significance. Consult with the Office of Historic Resources regarding projects that require environmental review in order to adequately evaluate the potential significance of buildings 45 years of age or more.*

*Policy LU25.1 Support Continued District Designations. Promote district designations, as well as maintenance and rehabilitation of historically significant structures in potential and proposed historic districts.*

*Policy LU25.2 Promote Neighborhood Conservation Techniques. Promote the initiation and adoption of innovative neighborhood conservation techniques such as community plan*

*implementation overlays (CPIOs) and community design overlays (CDOs) for areas that retain cohesive character but are not eligible to become HPOZs.*

The above referenced Framework, Conservation and Land Use Element goals, objectives and policies highlight some examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project expands the South Los Angeles CPIO District's Residential Subarea neighborhood conservation regulations. The Proposed Project does not intend to affect designated historical resources (e.g., HCMs) or reasonably expect to incentivize development of properties with historical resources. The Proposed Project carries over existing standards in the South Los Angeles CPIO that further protect historic and potentially historical resources by requiring additional review by the Office of Historic Resources for any project located on sites identified in the City of Los Angeles' SurveyLA report as an Eligible Historic Resource. This review would lead to further historic assessment being prepared, and/or modifications to development projects to ensure they adhere to the Secretary of the Interior's Standards for Rehabilitation and Guidelines Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. These requirements in the proposed amendment help capture any potential impacts to historic resources that are not currently captured for a typical "by-right" project.

**Urban Form and Neighborhood Design**

With respect to urban form and neighborhood design, the General Plan Framework includes the following goals, objectives, and policies:

*Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.*

*Objective 5.1: Translate the Framework Element's intent with respect to citywide urban form and neighborhood design to the community and neighborhood levels through locally prepared plans that build on each neighborhood's attributes, emphasize quality of development, and provide or advocate "proactive" implementation programs.*

*Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.*
*Policy 5.2.1: Designate centers and districts in locations where activity is already concentrated and/or where good transit service is, or will be, provided.*

*Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*

*Objective 5.6: Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.*

*Objective 5.7: Provide a transition between conservation neighborhoods and their centers.*

*Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian- oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus of investment in the community.*

With respect to urban form and neighborhood design, the South Los Angeles Community Plan (Land Use Element) state the following:

*Policy LU16.3: Superior Design. Promote context-sensitive design that provides for quality and aesthetically pleasing façades visible from public view.*

*Policy LU18.2: Minimize Impacts. Minimize impacts to sensitive uses and surrounding neighborhoods through transitions and buffering.*

*Policy LU19.9: Transit Access. Orient new development located near transit to provide direct pedestrian connections to the Metro Station/Platform/Mezzanine wherever possible and encourage projects to provide people-oriented built environment features such as shade trees, bus shelters and bicycle racks or lockers.*

The above referenced goals, objectives and policies are some examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project focuses on incentivizing development within the area served by the Metro E Line and key commercial corridors. The proposed project will expand South Los Angeles Residential CPIO subareas to include development standards that ensure neighborhood compatibility with respect to design and scale. Existing CPIO development standards also regulate building materials and architectural details to ensure that there is a high standard of design quality in new development. Compliance with these standards would contribute to the creation of a vibrant urban environment, promote the development of complete communities, and activate the area surrounding the Metro E Line and selected TOD corridors.

**Economic Development**

With respect to economic development, the Framework Element states the following:

*Policy 7.2.3 Encourage new commercial development in proximity to rail and bus transit corridors and stations.*

*Policy 7.3.2: Retain existing neighborhood commercial activities within walking distance of residential areas.*

*Objective 7.9 Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's workforce to both live and work in the City.*

*Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.*

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

With respect to economic development, the South Los Angeles Community Plan states the following:

*Policy LU6.3: Diverse and Desirable Uses. Attract a diversity of uses that strengthen the economic base and expand market opportunities for existing and new businesses, and provide a distribution of desirable amenities throughout the community, including full service grocery stores, quality sit-down restaurants, and entertainment venues.*

*Policy LU6.4 Encourage Office Uses. Encourage the development of business, professional and medical offices along commercial corridors within a variety of building typologies.*

The goals, objectives and policies referenced above, reflect some examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project further incentivizes mixed-income, mixed-use residential and commercial development by upgrading access to density, increased height and FAR bonuses for certain TOD nodes near the Metro E Line. The Proposed Project prioritizes the production of affordable mixed-use development in addition to expanding opportunities for new businesses that can serve the area's established and emerging regional destinations including the USC campus, the Memorial Coliseum and the museums of Exposition Park, among others. Incentives within TOD areas also require that neighborhood-serving amenities (i.e., Targeted Commercial Uses) be included in projects within these commercially zoned TOD areas, thus strengthening neighborhood stability and providing residents increased access to nearby jobs and services.

**Distribution of Land Use**

With respect to the distribution of land use, the General Plan Framework Element states the following:

*Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*

*Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.*

*Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

With respect to the distribution of land use, the South Los Angeles Community Plan states the following:

*Policy LU1.11: Mixed-Income Communities. Encourage additional mixed-income neighborhoods by promoting affordable housing and reducing residential segregation and concentrations of poverty.*

*Policy LU5.1: Address Diverse Resident Needs. Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2035.*

*Policy LU5.6: Locate Density Appropriately. Locate higher residential densities, senior citizen housing, affordable housing and mixed-income housing, when feasible, near commercial centers, transit stops (e.g., near Expo Line and Green Line station areas) and public service facilities.*

The objectives and policies referenced above, reflect some examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project balances the distribution of residential densities to encourage development that is affordable to the income levels of area residents, further maintaining affordable housing stock within established residential neighborhoods and concentrating higher density affordable housing near commercial corridors

closer to transit, thus improving access to transit options and promoting the reduction of greenhouse gas pollution and improving the overall quality of life for all segments of the community.

**Population and Employment Growth**

With respect to population and employment growth, the General Plan Framework Element states the following:

*Objective 3.3: Accommodate projected population and employment growth within the City and each Community Plan Area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.*

*Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.*

*Policy 3.4.3. Establish incentives for the attraction of growth and development in the districts, centers, and mixed-use boulevards targeted for growth that may include:*

*a. Densities greater than surrounding areas,*
*b. Prioritization of capital investment strategies for infrastructure, services, and amenities to support development,*
*c. Economic incentives*
*d. Streamlined development review processes,*
*e. "By-right" entitlements for development projects consistent with the community plans and zoning,*
*f. Modified parking requirements in areas in proximity to transit or other standards that reduce the cost of development, and*
*g. Pro-active solicitation of development.*

With respect to population and employment growth, the South Los Angeles Community Plan states the following:

*Policy LU5.1: Address Diverse Resident Needs. Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2035.*

The objectives and policies, referenced above, highlight some examples of how the Proposed Project is consistent the General Plan and its Elements. The State of California requires that cities plan for changes in population, housing demand and employment. If growth is anticipated, each city must accommodate a share of the region's projected growth. These projections are developed by the Southern California Association of Governments (SCAG), the Metropolitan Planning Organization for the six-county region. SCAG is mandated by federal and state governments to prepare the Regional Transportation Plan (RTP), a long-range regional transportation plan that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends. The RTP informs SCAG's projection of growth for the region. State and federal regulations require that local plans be consistent with the Regional Air Quality Plan and the Regional Mobility Plan.

The Proposed Project will remain consistent with State Law and focuses on accommodating for population and job growth as adopted in the South Los Angeles Community Plan to the year 2035. Underlying zoning within the Proposed Project area will remain the same and additional CPIO Affordable Housing Project incentives will be provided within intensified TOD centers and mixed-use boulevards within transit station areas. Finally, the Proposed Plan continues the CPIO's Administrative Clearance process, which represents a more streamlined development review, essentially making most projects "by-right" when they are in compliance with CPIO regulations and do not exceed identified environmental thresholds.

**Mobility and Connectivity**

The City's Mobility Plan 2035 (Circulation Element) contains a number of important policies related to the Proposed Plan, including:

> *Policy 1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.*
>
> *Policy 2.3 Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*
>
> *Policy 3.1 Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City's transportation system.*
>
> *Policy 3.3 Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*
>
> *Policy 3.5 Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.*

With regards to mobility and connectivity, the South Los Angeles Community Plan states the following:

> *Policy M5.2: Development at Transit Nodes. Facilitate development and public improvements at multi-modal transit nodes or intersections that Metro identifies as major transfer nodes to promote convenient access between new development and the transit system.*
>
> *Policy M11.1: Reduced Parking Near Transit Centers. Consider reductions in parking requirements for projects located within the transit station areas.*

The above referenced goals, objectives and policies are examples of how the Proposed Project is consistent the General Plan and its Elements. The Proposed Project is consistent with the Circulation Element and Land Use Element of the General Plan in that it concentrates future jobs and housing growth in accessible locations near the Metro E Line and select TOD corridors near transit rich areas to help minimize increases in vehicular trips and improve air quality. The Proposed Project encourages residential and mixed-use development to occur near transit corridors which helps promote a pedestrian-oriented environment and supports access to employment opportunities, destinations, and neighborhood services to occur within close proximity of residents. TOD Subareas also include incentives to reduce minimum parking requirements for qualifying projects, and encourage the inclusion of pedestrian-related amenities (i.e., benches, tables, bicycle racks, landscaping) and public spaces within new development.

**LAMC Section 13.14 C.4**
In addition to the findings in 12.32 C, the amendment of a CPIO District also requires a finding that the supplemental development regulations of the CPIO District are consistent with, and necessary to implement, the programs, policies, or urban design guidelines of the Community Plan for that area.

The supplemental development regulations of the proposed amendment to the South Los Angeles CPIO are consistent with and necessary to implement the programs, policies, and goals of the South Los Angeles Community Plan. The CPIO regulations set forth affordable housing incentives to encourage mixed-income housing along select TOD corridors, further enforce tenant protections within the proposed "Protected Unit Area" of the CPIO Residential Subareas Chapter V. In addition, the expansion of the Character Residential Legacy Single-Family, and Multi-Family CPIO Residential subareas, aim to promote development that is compatible with the scale and design of the established neighborhoods. The Proposed Project is also in conformity with and necessary to implement the following policies of the existing adopted South Los Angeles Community Plan:

*Policy LU1.10: Minimize Displacement. New development should aim to minimize displacement of current residents.*

*Policy LU1.11: Mixed-Income Communities. Encourage additional mixed-income neighborhoods by promoting affordable housing and reducing residential segregation and concentrations of poverty.*

*Policy LU2.1: Quality Design. Seek a high degree of architectural compatibility and landscaping for new infill development, as well as for additions to existing structures, in order to protect the character and scale of existing single family residential neighborhoods.*

*Policy LU3.1: Consider Compatibility. Protect existing single-family and low-density residential neighborhoods from encroachment by higher-density residential and other incompatible uses.*

*Policy LU3.2: Appropriate Scale. Proposed development should be designed to achieve transition in scale and be compatible with adjacent single-family neighborhoods.*

*Policy LU3.3: Compatible Design. New development of single-family units should maintain the visual and physical character of adjacent single-family properties in the neighborhood, including the maintenance of front property setbacks, including front yard fence location, design, and materials, modulation of building volumes, and articulation of façades to convey the sense of individual units, and the use of building materials that characterize single-family housing.*

*Policy LU4.1: Architectural Compatibility. Seek a high degree of architectural compatibility and landscaping for new infill development to protect the historical and architectural character and scale of existing residential neighborhoods, including front yard fence location, design, and materials.*

*Policy LU5.1: Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2035.*

*Policy LU5.2: Diverse and Affordable Housing. Prioritize housing that is affordable to a broad cross-section of income levels, that provides a range of residential product types, and that supports the ability to live near work.*

*Policy LU5.4: Preserve Rent Stabilized Units. Encourage the preservation and maintenance of rental units that are protected by the Rent Stabilization Ordinance and strive for a no net-loss of affordable units in the Plan Area and discourage displacement of existing residents.*

*Policy LU5.5: Housing for Families. Promote family-friendly projects that include residential units of three or more bedrooms suitable for larger families.*

*Policy LU5.6: Locate Density Appropriately. Locate higher residential densities, senior citizen housing, affordable housing and mixed-income housing, when feasible, near commercial centers, transit stops (e.g., near Expo Line and Green Line station areas) and public service facilities.*

*Policy LU12.1 Density and Mixed-Use. Locate higher densities and a mix of uses in areas designated community commercial, as appropriate, unless identified as commercial-only. Policy LU12.2 Design for Transitions. The scale and massing of new development along corridors should provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods with lower development intensities and building heights.*

*Policy LU13.5 Promote Mixed-Use Districts. Encourage mixed-use districts that combine a variety of uses to achieve a community where people can shop, live and work with reduced reliance on the automobile.*

*Policy LU13.6 Appropriate Medium-Density Housing. Increase mixed-use housing opportunities by encouraging medium-density residential development, including townhomes and senior housing, where appropriate.*

*Policy LU13.7 Daily Needs Within Walking Distance. Encourage walkability within Neighborhood Commercial areas by fostering a variety of uses that serve the daily needs of adjacent residential areas.*

*Policy LU19.3: Mixed-Income Housing. Incentivize the production of affordable and/or mixed-income housing in Transit-Oriented Districts.*

The Proposed Project reinforces the protection and production of affordable housing which will provide access to employment opportunities within close proximity to the existing and emerging employment centers of the City. The CPIO amendment will also encourage mixed-use districts with diverse income levels to allow for different workforce populations to live within the vicinity and reduce displacement. The proposed upgrade of TOD areas along select corridors will also allow for a variety of employment uses to occur near transit and Active Transportation Corridors by increasing development capacity that facilitates mixed-use development.

The Proposed Project will strengthen neighborhood stability through the expansion of CPIO Residential Subareas that will require proposed development to be compatible in scale and design to surrounding homes without decreasing residential unit capacity. In accordance with the no-net-loss provisions of the HCA, the intensity of nearby select TOD nodes and corridors will be increased to further incentivize the production of affordable housing, allowing for more housing. The proposed application of demolition delays and tenant protections within the CPIO Residential subarea's "Protected Unit Area" also aim to ensure the protection of existing rent stabilized and

other forms of ‘naturally occurring affordable housing’ units thus encouraging a balance of rental market price points that accommodate varying tenant income levels within the area

## Other Findings

### State Law Restrictions on Zoning Actions under Housing Crisis Act (SB 330/SB8)

On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019. The act amends existing state laws and creates new regulations around the production, preservation and planning of housing. The bill has been in effect since January 1, 2020 and sunsets on January 1, 2025. SB 8 extends key provisions of SB 330 until January 1, 2030. The goal of SB 330 is to create certainty in the development of housing projects, speeding up the review of these projects. The bill requires that the historic status or designation of any site be determined at the time an application for a discretionary action is deemed complete. Non-objective design review standards established after January 1, 2020, cannot be imposed or enforced. The proposed amendments to the existing South Los Angeles CPIO include only objective design standards that comply with the SB 330 requirement and are implemented through a ministerial process. SB 330 also prevents zoning actions that reduce the capacity of housing. Specifically, Government Code Section 66300(b)(1)(A) provides:

> [a] city shall not enact a development policy, standard, or condition that would have any of the following effects:
> (A) Changing the … zoning of a parcel or parcels of property to a less intensive use or reducing the intensity of land use within an existing … zoning district …, below what was allowed under the … zoning ordinances … in effect on January 1, 2018 …. For purposes of this subparagraph, “reducing the intensity of land use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site’s residential development capacity.

Based on this, any CPIO or zoning amendment that results in a net downzoning or otherwise reduces housing capacity (with limited exceptions involving health and safety, affordable housing and voter initiatives) are prohibited. Moratoriums on housing development, or limits on approval, permits, or housing units cannot be imposed by local jurisdictions. This does not apply to zoning amendments that reduce intensity for certain parcels as long as density, height and bulk (FAR) is increased on other parcels and therefore results in no net loss in zoned housing capacity or intensity. There are currently four TOD Subareas in the South Los Angeles CPIO: Low, Medium, High, and Regional. The proposed amendments that involve the creation of the CPIO Protected Unit Area and the expansion of the CPIO Residential Subarea into new neighborhoods do not reduce allowed height or density but do potentially reduce allowed residential floor area and therefore, do involve a reduction in “residential development capacity.” This reduction takes into account CPIO Residential Subarea supplemental development regulations including stepbacks and setback requirements, for a total reduction of approximately 8.4 million square feet. To ensure compliance with the HCA and ensure there is “no net loss” from this reduction in residential development capacity, the project includes amendments to increase residential development capacity by amending the CPIO regulations to increase allowed bonus incentives for certain identified sites in TOD Subareas. Specifically, the off-setting amendments apply a higher TOD Medium, TOD High or TOD Regional subarea designation to parcels currently designated TOD Low, TOD Medium, or TOD High. This increase in designation will result in a higher bonus FAR and height in accommodating residential unit capacity by approximately 8.4 million square feet and therefore the Proposed Project complies with this requirement. Assumptions about these calculations relied on lot area and development standards for the underlying zone compared to

those applied by the CPIO and a summary of these assumptions has been included in the project file. (Exhibit F.5)

**Summary of CEQA Findings**

As demonstrated in Exhibit C.1, approval of the proposed amendment to the South Los Angeles CPIO is supported by an Addendum to the South Los Angeles and Southeast Los Angeles Final Environmental Impact Report, SCH Nos. 2008101097 (Southeast Los Angeles) and 2008101098 (South Los Angeles), that reviews the Proposed Plan.

An Environmental Impact Report (EIR), EIR No. ENV-2008-1780-EIR and ENV-2008-1781-EIR, SCH Nos. 2008101097 and 2008101098, was prepared for the South Los Angeles and Southeast Los Angeles Community Plan updates, among other approvals, and certified on November 22, 2017. The South Los Angeles and Southeast Los Angeles Community Plan Update Final EIR was prepared in accordance with California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. As shown in the Addendum dated October 2022 for the Slauson TNP project and the Addendum dated November 2022 for this project, none of the criteria under Public Resources Code Section 21166 or CEQA Guidelines Section 15162 require the preparation of a supplemental EIR or subsequent EIR or negative declaration based on changes to the project assessed in the EIR, changes to circumstances, or new information.

# PUBLIC HEARING AND COMMUNICATIONS

***Summary of Outreach***

Outreach and collaboration with the NANDC Taskforce began in early 2021 while the Department prepared its initial recommendations for a formal work program. Several organizations were initially part of the taskforce and the Department also met individually with community groups to collect additional feedback. This initial round of outreach assisted the Department in recommending the two phases as described in the Background section of this report.

| Community Meetings in 2021 | |
|---|---|
| NANDC Taskforce | 2/17/21, 3/17/21, 6/16/21, 8/18/21, 9/15/21, 10/20/21 |
| Voices Neighborhood Council | 11/19/21 |
| USC Forward Coalition | 11/18/21, 11/30/21 |
| Additional Groups | ACCE 3/10/21<br>Property owner representative11/5/21 |

The formal work program for the South Los Angeles CPIO amendments was launched in January 2022 and the Department continued its work with the NANDC Taskforce, while also continuing its efforts to meet with individual groups.

| Community Meetings in 2022 | |
|---|---|
| NANDC Taskforce | 1/19/22, 2/17/22, 3/16/22, 4/20/22, 5/18/22, 7/20/22, 8/17/22, 10/19/22 |
| Voices Neighborhood Council | 4/19/22, 5/17/22, 8/16/22 |
| USC Forward Coalition | 4/8/22, 5/12/22, 9/15/22, 10/4/22 |
| Additional Groups | NANDC Taskforce Members 1/10/22<br>USC 8/12/22<br>SAJE 8/25/22<br>NANDC General Board 9/1/22<br>UNNC 9/7/22<br>Individuals: 5/17/22, 9/15/22<br>Housing Development Stakeholders: 10/26/22 |

In addition to background research, field observations, and internal meetings with other divisions within City Planning, collaboration and communication with Council District 8, Council District 9, LAHD, as well as the LADBS, also helped inform the proposed amendments to the South Los Angeles CPIO.

To support outreach and provide members of the public with information about the Proposed Project, a bilingual Fact Sheet and Storymap were posted on the Department's website. The Fact

Sheet contained a summary of the project's major provisions and the Storymap provided detailed information about where the proposed amendments would take place in each neighborhood.

***Public Hearing***

An Information Session and Public Hearing were held virtually on September 21, 2022. Approximately 50,000 notices were mailed to all property owners and all building occupants in the project area and within a 500-foot radius of the Proposed Project area. A bilingual public notice was posted on the Department's website, in addition to an official ad that was placed in the Daily Journal on August 26, 2022. Email notifications were sent to a list of roughly 8,000 individuals who are signed up to the Department's South Los Angeles interest list, including approximately 50 individuals added as interested parties for the Proposed Project.

The Public Hearing was attended by approximately 136 individuals. Approximately 33 members of the public provided verbal testimony at the public hearing and were each given a maximum speaking time of three minutes, with six minutes provided for those providing testimony in another language. The public comment period was left open until October 12, 2022, and additional written comments were submitted.

Comments and feedback received informed revisions to the public hearing draft of the proposed amendments. Revisions and considerations are discussed further throughout this report and in detail in the Discussion of Key Issues and Recommended Revisions to the Proposed Project sections of this report. A brief summary of the comments provided are also thematically summarized below.

*Enhanced Tenant Protections and Replacement Requirements*

- Support for the enhanced tenant protections and replacement requirements because they support the goal of reducing displacement of existing low-income residents in the project area
- Concerns that the proposed amendments don't go far enough in terms of protecting tenants, and requests to include more specific policies and language that increase tenant relocation benefits, increase tenant's access to remedies, and restrict building permits for developers involved tenant harassment.
- Opposition to the enhanced tenant protections and replacement requirements because they may make new projects infeasible or deter the production of more affordable housing in the Proposed Project area, may deter innovative typologies (i.e., modular housing), or could be confusing for developers in light of existing state law.
- Comments that the Housing Crisis Act already provides sufficient protections

*CPIO Residential Subarea Changes*

- Support for applying the CPIO's standards to encourage projects to be more compatible with the surrounding neighborhood design and scale.
- Opposition to the application of the CPIO's standards to additional neighborhoods because the standards may deter the ability to unify lots for larger projects; overall opposition to moving away from by-right development
- Request to exempt single-family homes from the enhanced tenant protections and replacement requirements added to the CPIO Residential Subarea.

*CPIO TOD Subarea Changes*

- Requests that increases in density along the Vermont corridor should be accompanied by increasing affordability requirements.
- Concerns that increased development potential as proposed for the TOD Subareas will lead to a loss of existing commercial amenities, including neighborhood serving uses such as grocery stores.

- Opposition to increasing TOD Subarea designations that includes bonuses or incentives for commercial developments that include hotels.
- Request to exempt 100% affordable housing projects from the requirements added to the TOD Regional Subarea.

*Student Housing and Co-Living*
- Concern that the proliferation of co-living projects is impacting the character of the neighborhood, including by contributing to the displacement of existing low-income residents.
- Requests to amend the Neighborhood Stabilization Ordinance to explicitly define and regulate co-living facilities, including by restricting them to the R4 zone or C2 zone

*Historic Preservation and Historic Resources*
- Requests to amend the definition of “Eligible Historic Resource” to include any structure that is 60 years old or older and/or add more sites to the list of Eligible Historic Resources by launching a new survey that re-evaluates the project area’s resources and further captures cultural resources.

Demolition Delays
- Support for delaying demolitions until a new project is approved on-site to address blight caused by vacant lots.
- Concerns that delays in demolitions could lead to an increase in vacant buildings which can increase risk for property owners and decrease the health and safety of the neighborhood overall.

*Geographic Scope of Project Area*
- Requests to expand the Protected Unit Area to other parts of the South Los Angeles Community Plan Area and to other Community Plan areas such as the adjacent Southeast Los Angeles and West Adams-Baldwin Hills-Leimert Community Plan areas.
- Request to reduce the project area to north of MLK Blvd.

*Additional Topics*
- Concerns about the effectiveness of current CPIO Administrative review procedures.
- Concerns about the decreasing tree canopy in the South Los Angeles Community Plan area and requests to evaluate and document the presence of existing trees during the application process.
- Requests for the City to maintain and/or publish data about residential projects, demolitions, and tenant relocations.
- Questions about how the proposed changes will impact specific properties or how the CPIO interfaces with areas of the South Los Angeles Community Plan area where no subareas are applied; questions about whether the proposed amendments include plans for the City to re-develop sites within the project area.
- Concerns that a decrease in parking requirements will impact the ability for existing residents to find adequate parking; concerns about the lack of an adequate amount of existing parking.
- Overall opposition to the proposed amendments because they may contribute to increased density and traffic in the Proposed Project area and increase development regulations.

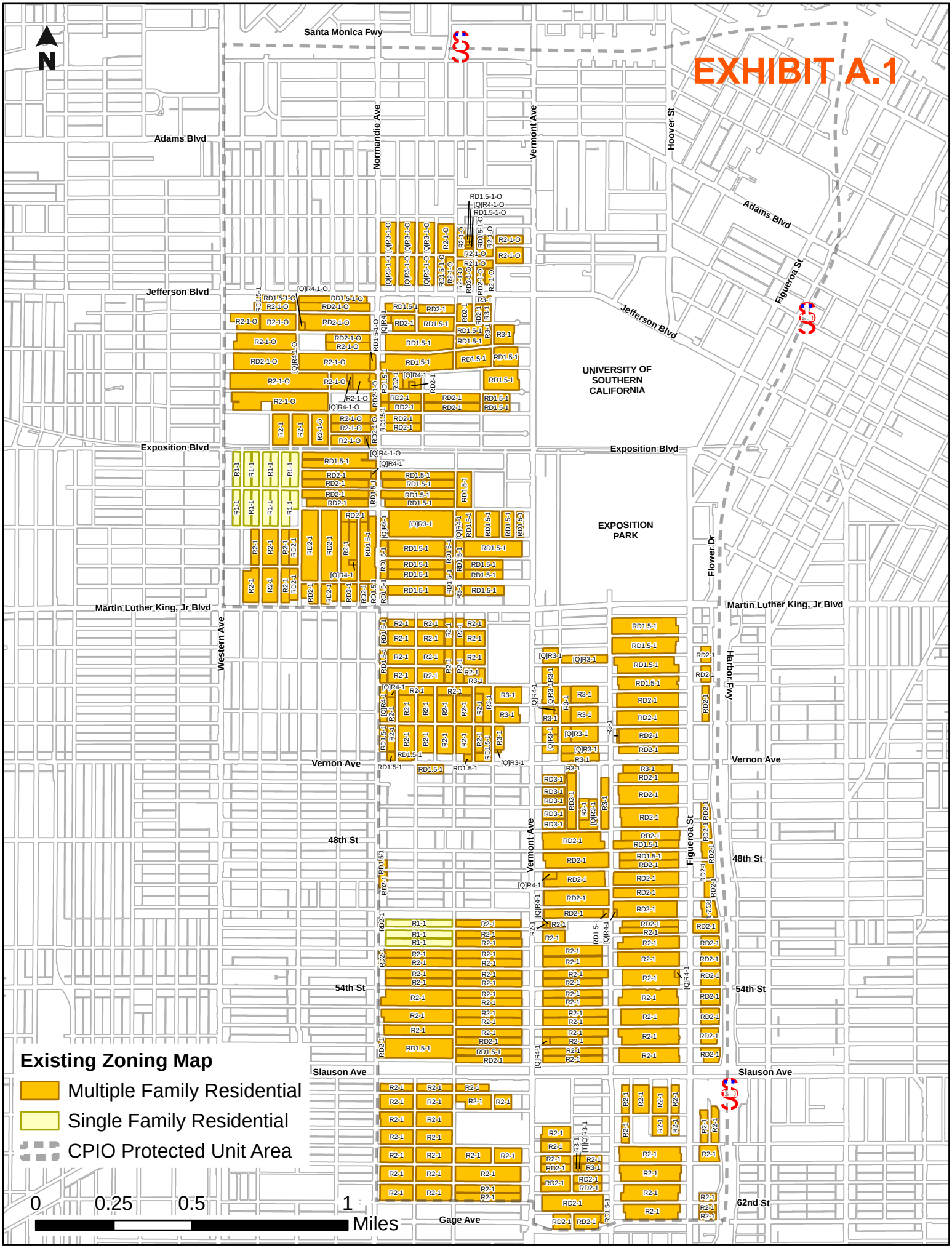
# EXHIBIT A.1:

# Existing Zoning Map

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022


EXHIBIT A.1
N
Santa Monica Fwy
Adams Blvd
Normandie Ave
Vermont Ave
Hoover St
Figueroa St
Jefferson Blvd
UNIVERSITY OF SOUTHERN CALIFORNIA
Exposition Blvd
EXPOSITION PARK
Flower Dr
Martin Luther King, Jr Blvd
Western Ave
Harbor Fwy
Vernon Ave
48th St
54th St
Slauson Ave
62nd St
Gage Ave
Existing Zoning Map
Multiple Family Residential
Single Family Residential
CPIO Protected Unit Area
0
0.25
0.5
1
Miles

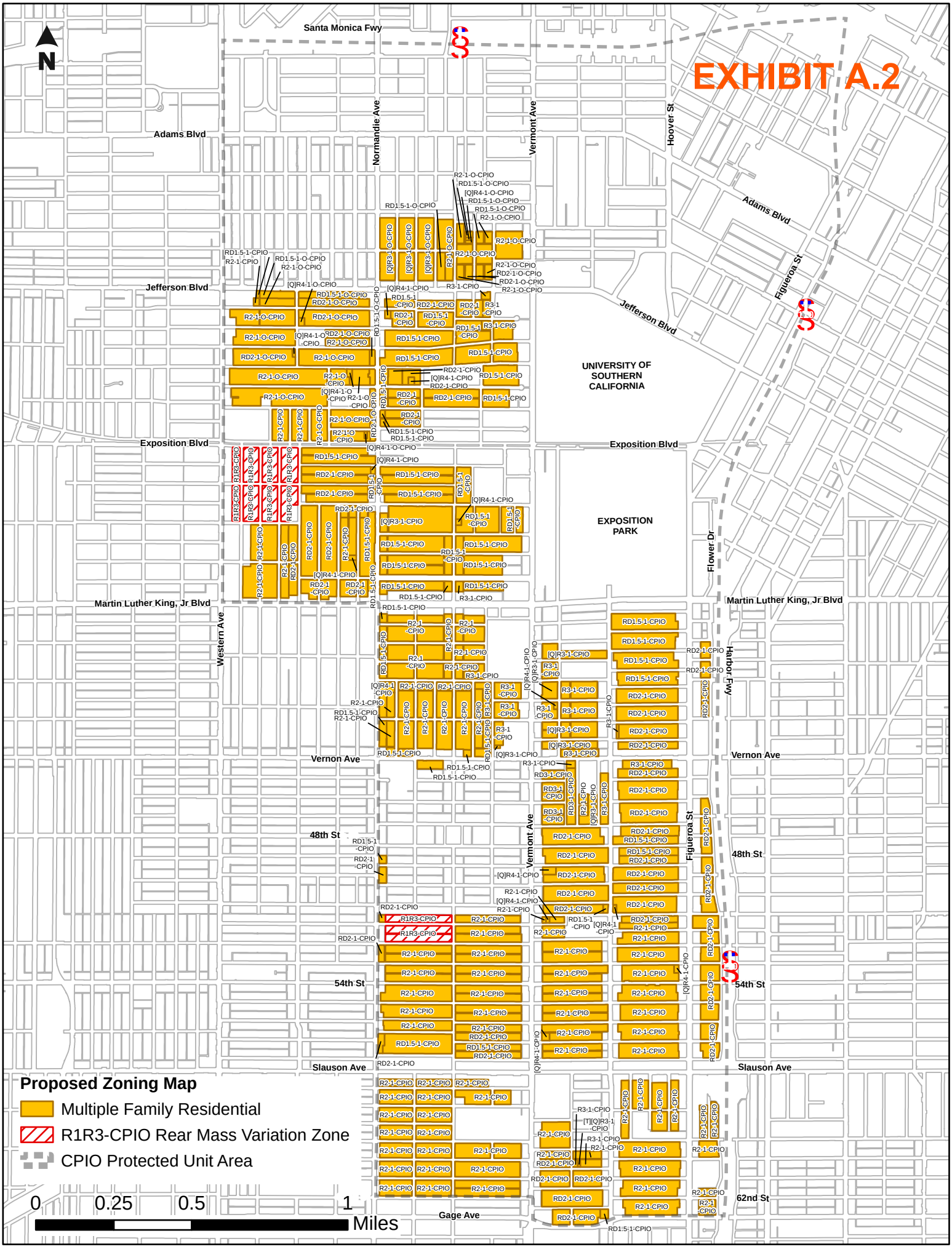
# EXHIBIT A.2:

# Proposed Zoning Map

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022


EXHIBIT A.2
N
Santa Monica Fwy
Adams Blvd
Normandie Ave
Vermont Ave
Hoover St
Figueroa St
Jefferson Blvd
UNIVERSITY OF SOUTHERN CALIFORNIA
Exposition Blvd
EXPOSITION PARK
Flower Dr
Martin Luther King, Jr Blvd
Western Ave
Harbor Fwy
Vernon Ave
48th St
54th St
Slauson Ave
Gage Ave
62nd St
Proposed Zoning Map
Multiple Family Residential
R1R3-CPIO Rear Mass Variation Zone
CPIO Protected Unit Area
0
0.25
0.5
1
Miles

# EXHIBIT B.1:

# Proposed Text Amendments to the South Los Angeles CPIO

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

**EXHIBIT B.1**

Proposed Changes (Annotated Version)

# South Los Angeles

# Community Plan Implementation Overlay District

(South LA CPIO District)

**Ordinance No. 185927**

**Effective Date December 29, 2018**

Technical Clarification April 5, 2019

Amended by Ordinance No. _____

Effective _____

## TABLE OF CONTENTS


| | |
|---|---|
| Chapter I | Function of the CPIO District |
| Chapter II | Corridors Subareas |
| Chapter III | TOD Subareas |
| Chapter IV | Industrial Subareas |
| Chapter V | Residential Subareas |
| Appendix A | Environmental Standards |
| Appendix B | Tenant Protections Resources |


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Black text = Existing CPIO text
~~Black strikethrough text~~ = Existing CPIO text to be removed/modified
Red text = New CPIO text

*Note to Reader:*

*This document includes the amendments, edits, or additions as part of the South Los Angeles CPIO Amendment. As a result of amendments to Chapter V, amendments to Chapter I of the CPIO (e.g., Definitions) and amendments to Chapter III (e.g., Figures and Tables) were amended accordingly. (See Exhibit B.2 for full text - Chapters I, III, V and new Appendix B.)*

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## CHAPTER I – FUNCTION OF THE CPIO DISTRICT

*Proposed amendments to Chapter I – Figure I "CPIO District Boundaries" consist of three changes: 1) new "CPIO Protected Unit Area"; 2) Residential Subareas applied to new areas inside the CPIO Protected Unit Area; and 3) TOD Subarea designation changes for select existing TOD Subareas.*

*(For an interactive map of changes, please visit: https://planning.lacity.org/plans-policies/proposed-land-use-regulations under the "South Los Angeles CPIO Amendment" section.)*

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Figure 1
CPIO District Boundary



**CORRIDORS SUBAREAS**
- Subarea A - Neigborhood-Serving Corridor
- Subarea B - Parkway Corridor
- Subarea C - General Corridor
- Subarea D - Commercial Corridor

TOD SUBAREAS
- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional

**INDUSTRIAL SUBAREAS**
- Subarea I - Hybrid Limited
- Subarea J - Hybrid
- Subarea K - Compatible Industrial
- Subarea L - Industrial Innovation

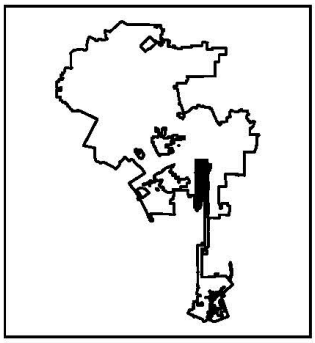
**RESIDENTIAL SUBAREAS**
- Subarea M - Legacy Single-Family (R2)
- Subarea N - Multi-Family
- Subarea O - Character Residential

South Los Angeles CPA

CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1
Miles



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Red text = New CPIO text

## CHAPTER I – FUNCTION OF THE CPIO DISTRICT

### Section I-4. DEFINITIONS

*Section I-4 is proposed to be amended to include the following new definition:*

**CPIO Protected Unit** – A residential dwelling unit within a "CPIO Protected Unit Area" (Figure V-1, Figure V-2) that is or was, within the last five years: (1) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; (2) subject to any form of rent or price control through a public entity's valid exercise of its police power; (3) rented by lower or very low income households; (4) withdrawn from rent or lease per the Ellis Act, within the past 10 years.

*(As of the date of adoption of this Ordinance, the definition of a CPIO Protected Unit shall only apply to properties within the Residential Subareas depicted in Figure V-1 and Figure V-2 of the CPIO.)*

### Section I-5. RELATIONSHIP TO OTHER ZONING REGULATIONS

*Section I-5 is proposed to be amended to include additional clarifying language:*

H. The LAMC shall prevail when there are any conflicts between the provisions of the South Los Angeles CPIO and the provisions of Redevelopment Project Areas.

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## CHAPTER III – TOD SUBAREAS

*Amendments to Figure III-1 and Figure III-2 "TOD Subareas" will consist of changes to designations of selected existing TOD Subareas with one of four treatments: TOD Low to TOD Medium, TOD Medium to TOD High, TOD Medium to TOD Regional, or TOD High to TOD Regional.*

*(See Exhibit B.2 for full text and Exhibit B.4 for Figures related CPIO Chapter III - TOD Subareas )*

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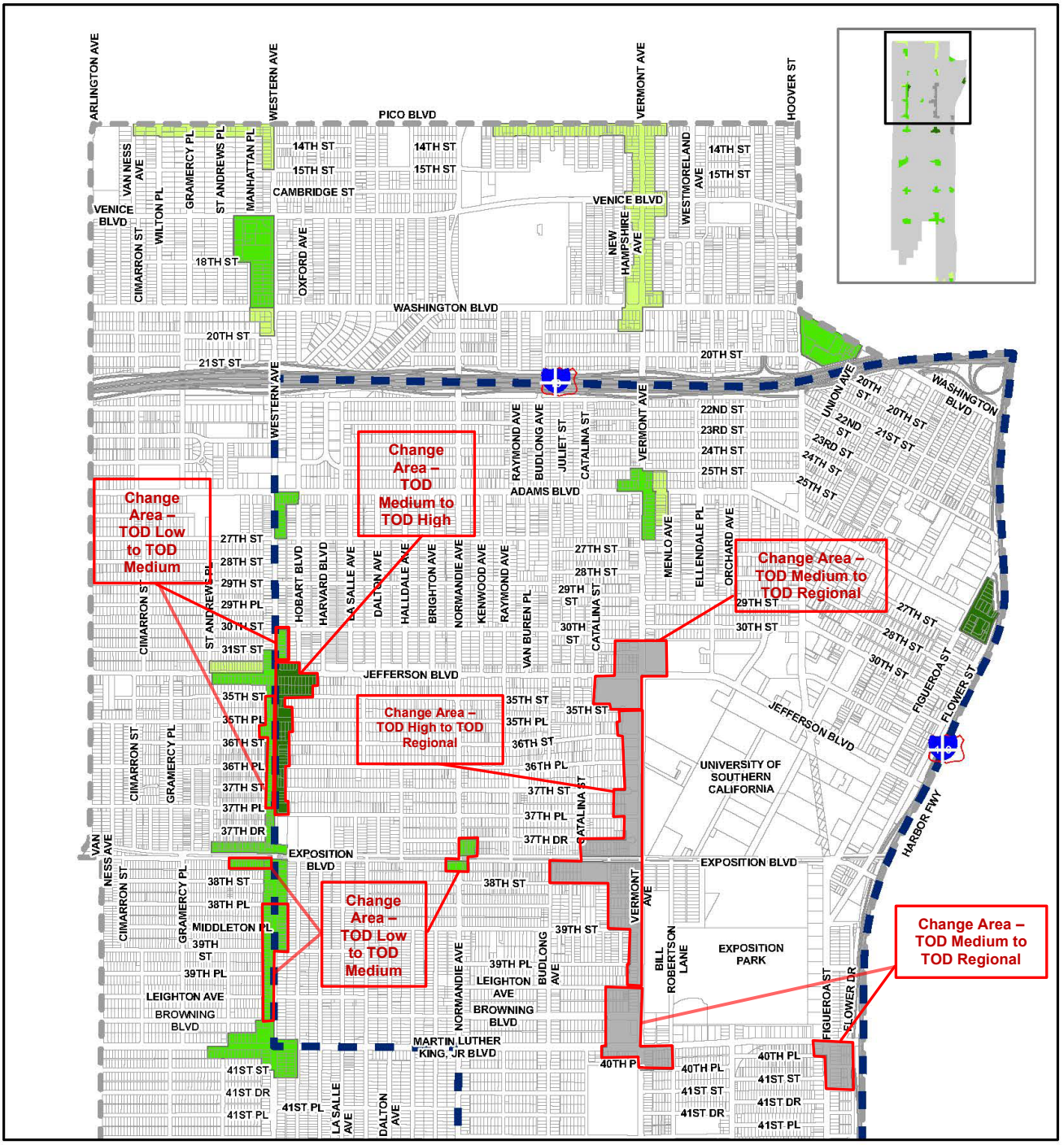



**Figure III-1, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

Chapter 3 - TOD SUBAREAS

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Red text = New CPIO text

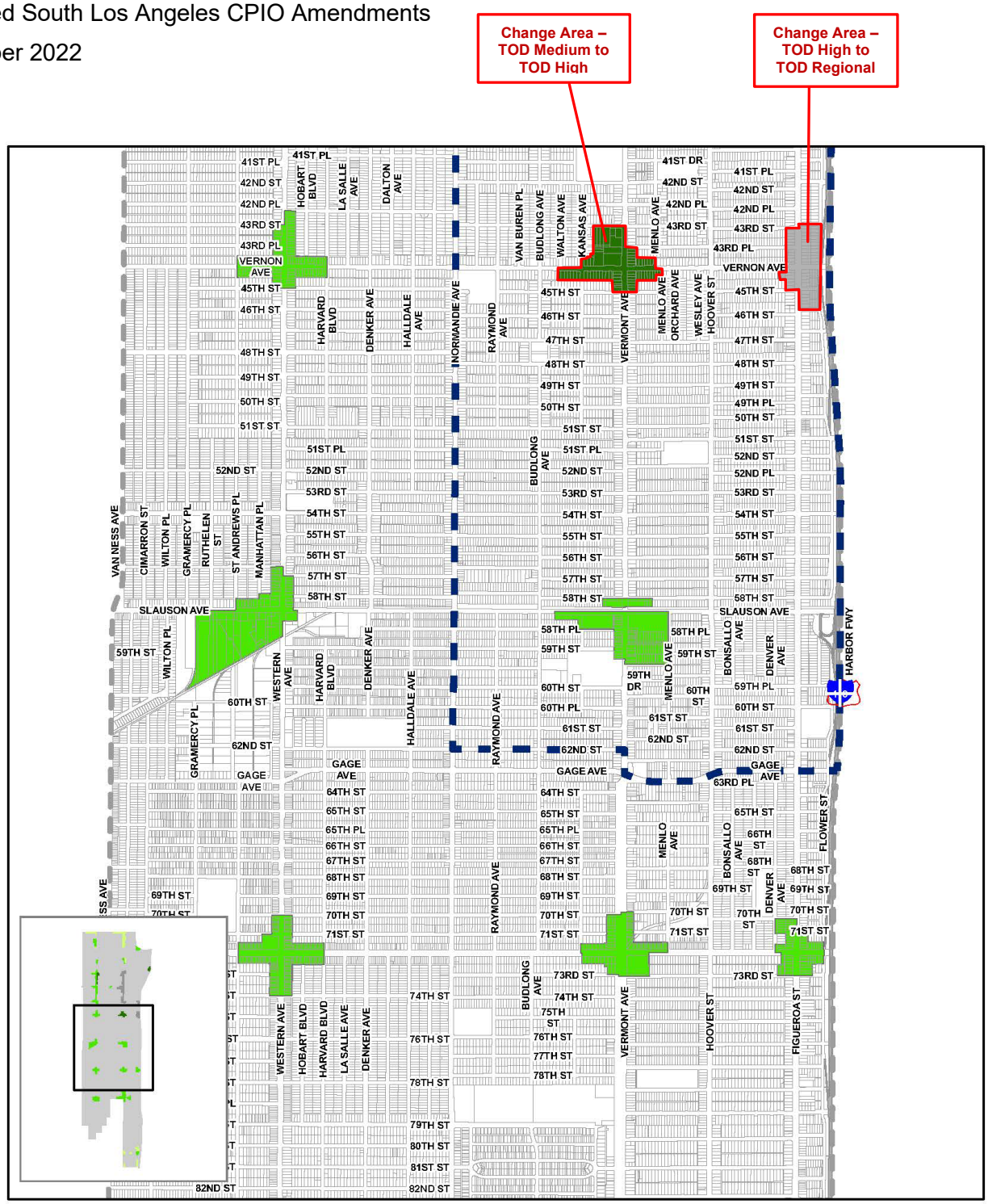



**Figure III-2, TOD Subareas**

Black text = Existing CPIO text
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Red text = New CPIO text




**Figure III-3, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

Chapter 3 - TOD SUBAREAS

Black text = Existing CPIO text
~~Black strikethrough text~~ = Existing CPIO text to be removed/modified
Red text = New CPIO text

## CHAPTER III – TOD SUBAREAS

*Amendments to Table III-2 will consist of changes to the Clarifications column for Subarea H - TOD Regional to address applicability of Bonus FAR, as follows:*

- Up to 6:1 FAR for CPIO 100 Percent Affordable Housing Projects.

- Up to 6:1 FAR for CPIO Mixed- Income Affordable Housing Projects, that include a TCU, UL and/or PAOS (inclusive of all bonuses and incentives), otherwise up to 5.5 Bonus FAR.

- Replacement units for CPIO Affordable Housing Projects within the boundaries of the CPIO Protected Unit Area (south of 30th Street, west of Hoover Street to Exposition Blvd, and north of 48th Street) shall not count towards any required Restricted Affordable Units and at least 30% of all units in developments larger than 5 units must have 2 or more bedrooms.

- Except for Supportive Housing, Transitional Housing, senior housing projects, housing for persons with disabilities, at least 30% of all units in CPIO Affordable Housing Projects in the CPIO Protected Unit Area larger than 5 units shall have 2 or more bedrooms.

- CPIO Affordable Housing Projects that result in the demolition of any units subject to any form of rent control, replacement units for CPIO Affordable Housing Projects in the CPIO Protected Unit Area shall not count towards any required Restricted Affordable Units.

*(See Exhibit B.2 for full text regarding CPIO Chapter III - TOD Subareas.)*

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**TABLE III-2**
**DENSITY, FAR, & HEIGHT**
**FOR ALL PROJECTS THAT INLCUDE RESIDENTIAL**

| | ALL PROJECTS - BASE (including Density Bonus and TOC) | | | | CPIO AFFORDABLE HOUSING PROJECTS BONUS | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Subarea** | **Base Density**[1] | Minimum Height | Base Height | Base FAR | Bonus Density | Bonus Height[2] | Bonus FAR[3] | Maximum Allowable FAR[3] | Clarifications |
| E (TOD Low) | 1/800 | N/A | 3 Stories/ 45 Feet | 1.5:1 | 1/300 | 4 Stories/ 60 Feet | 2:1 | up to 3:1 | •Maximum 2:1 FAR shall be reserved for CPIO Mixed-Income Housing Projects.<br>•Up to 3:1 FAR for CPIO Mixed-Income Housing Projects that include TCU, UL and/or PAOS (inclusive of all bonuses and incentives). |
| | | | | | | | 3:1 | 3:1 | •Maximum 3:1 FAR shall be reserved for CPIO 100% Affordable Housing Projects. |
| F (TOD Medium) | 1/800 | 2 Stories | 4 Stories/ 60 Feet | 1.5:1 | 1/300 | 5 Stories/ 75 feet | 3:1 | Up to 3.5:1 | • Up to 3.5:1 FAR for CPIO Affordable Housing Projects that include a TCU, UL and/or PAOS (inclusive of all bonuses and incentives). |
| G (TOD High)[1] | 1/800 | 2 Stories | 7 Stories/ 105 feet | 1.5:1 | 1/300 | 8 Stories/ 120 feet | 3.5:1 | up to 4:1 | • Up to 4.1 FAR for CPIO Affordable housing Project that includes a TCU, UL and/or PAOS (inclusive of all bonuses and incentives). |
| H (TOD Regional Center) | 1/800 | 2 Stories | 12 Stories/ 180 feet | 2.25:1 | No Limit | 15 Stories/ 225 feet | 6:1 | up to 6:1 | •Projects, may apply for a CUP pursuant to LAMC Sec. 12.24F. to request additional height.<br><br>•Up to 6:1 FAR for CPIO 100 Percent Affordable Housing Projects.<br><br>•Up to 6:1 FAR for CPIO Mixed- Income Affordable Housing Projects, that include a TCU, UL and/or PAOS (inclusive of all bonuses and incentives), otherwise up to 5.5 Bonus FAR.<br><br>• Replacement units for CPIO Affordable Housing Projects within the boundaries of the CPIO Protected Unit Area (south of 30th Street, west of Hoover Street to Exposition Blvd, and north of 48th Street) shall not count towards any required Restricted Affordable Units and at least 30% of all units in developments larger than 5 units must have 2 or more bedrooms.<br><br>• Except for Supportive Housing, Transitional Housing, senior housing projects, housing for persons with disabilities, at least 30% of all units in CPIO Affordable Housing Projects in the CPIO Protected Unit Area larger than 5 units shall have 2 or more bedrooms.<br><br>• CPIO Affordable Housing Projects that result in the demolition of any units subject to any form of rent control, replacement units for CPIO Affordable Housing Projects in the CPIO Protected Unit Area shall not count towards any required Restricted Affordable Units. |

[1] Base Density for Density Bouns and TOC Projects that meet certain requirements 1/400; see Section III-3 B.1.(a).

[2] Targeted Commercial Uses see Section III-3 A.3 for bonus height.

[3] Targeted Commercial Use(s) (TCU), Unified Lot (UL) and/or Publicly Accessible Open Space (PAOS); see Section III-3 B.2 for bonus FAR.

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## CHAPTER III – TOD SUBAREAS

*Amendments to Table III-3 will consist of changes to the applicability of Bonus FAR to commercial-only projects as follows:*

*(See Exhibit B.2 for full text regarding CPIO Chapter III - TOD Subareas.)*

**TABLE III-3**
**FAR AND HEIGHT for 100% COMMERCIAL PROJECTS**

| Subarea | Minimum Height | Base Height | Bonus Height[1] | Base FAR | Bonus FAR[2] | Clarifications |
|---|---|---|---|---|---|---|
| E (TOD Low) | N/A | 3 Stories/ 45 Feet | 4 Stories/ 60 feet | 1.5:1 | 3:1 | •Projects that incorporate select Targeted Commercial Use(s) qualify for 4 story Bonus height[1]<br>•Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to 3:1 Bonus FAR. |
| F (TOD Medium) | 2 Stories | 4 Stories / 60 Feet | 5 Stories/ 75 feet | 1.5:1 | up to 3.5:1 | • Full-Service Gorcery Store uses shall be exempt from the 2 story minimum height regulation.<br>• Projects that incorporate select Targeted Commercial Uses qualify for 5 story Bonus height[1]<br>•Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to 3.5:1 Bonus FAR. |
| G (TOD High) | 2 Stories | 7 Stories / 105 feet | N/A | 1.5:1 | 2.25:1 | • Professional Office and/or Research and Development Projects (where such uses shall comprise a minimum of 30 percent of the total square footage of the building) qualify for 2.25:1 Bonus FAR |
| | | | 8 Stories / 120 feet | | 4:1 | •Projects that involve hotel uses qualify for 4:1 Bonus FAR and 8 story Bonus height.Does not apply to properties fronting Western Ave. between Jefferson Blvd. and Exposition Blvd; and properties at the intersection of Vermont Ave. and Vernon Ave. |
| | | | 8 Stories / 120 feet | | up to 4:1 | • Projects that incorporate select Targeted Commercial Uses qualify for 8 story Bonus height. 1<br>• Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to 4:1 Bonus FAR. |
| H (TOD Regional Center) | 2 Stories | 12 Stories / 180 feet | 13 Stories / 195 feet | 3:1 | up to ~~6:1~~ 4:1 | • Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to ~~6:1~~ 4:1 Bonus FAR and one additional story. |
| | | | ~~15 Stories / 225 feet~~ | | ~~4:1~~ | • Projects that incorporate hotel, Professional Office, Research and Development and/or Major Retailer uses (and such use shall comprise a minimum of 30 percent of the total square footage of the building) qualify for 4:1 Bonus FAR and ~~15~~ 13 story Bonus height. [1] |

[1] Targeted Commercial Uses see Section III-3 A 3 for bonus height
[2] Targeted Commercial Use(s) (TCU), Unified Lot (UL), Publicly Accesible Open Space (PAOS) and/or a Public Plaza (PP), see Section III-3 B.2 for bonus FAR

## CHAPTER V - RESIDENTIAL SUBAREAS

*Amendments to Figure V-1 and Figure V-2 "Residential Subareas" will consist of adding new areas to one of the three existing Residential Subareas: Legacy Single-Family, Multi-Family, or Character Residential. A new "CPIO Protected Unit Area' will also be established (See Section V-1 Applicability).*

*(For an interactive map of changes, please visit: https://planning.lacity.org/plans-policies/proposed-land-use-regulations under the "South Los Angeles CPIO Amendment" section.)*

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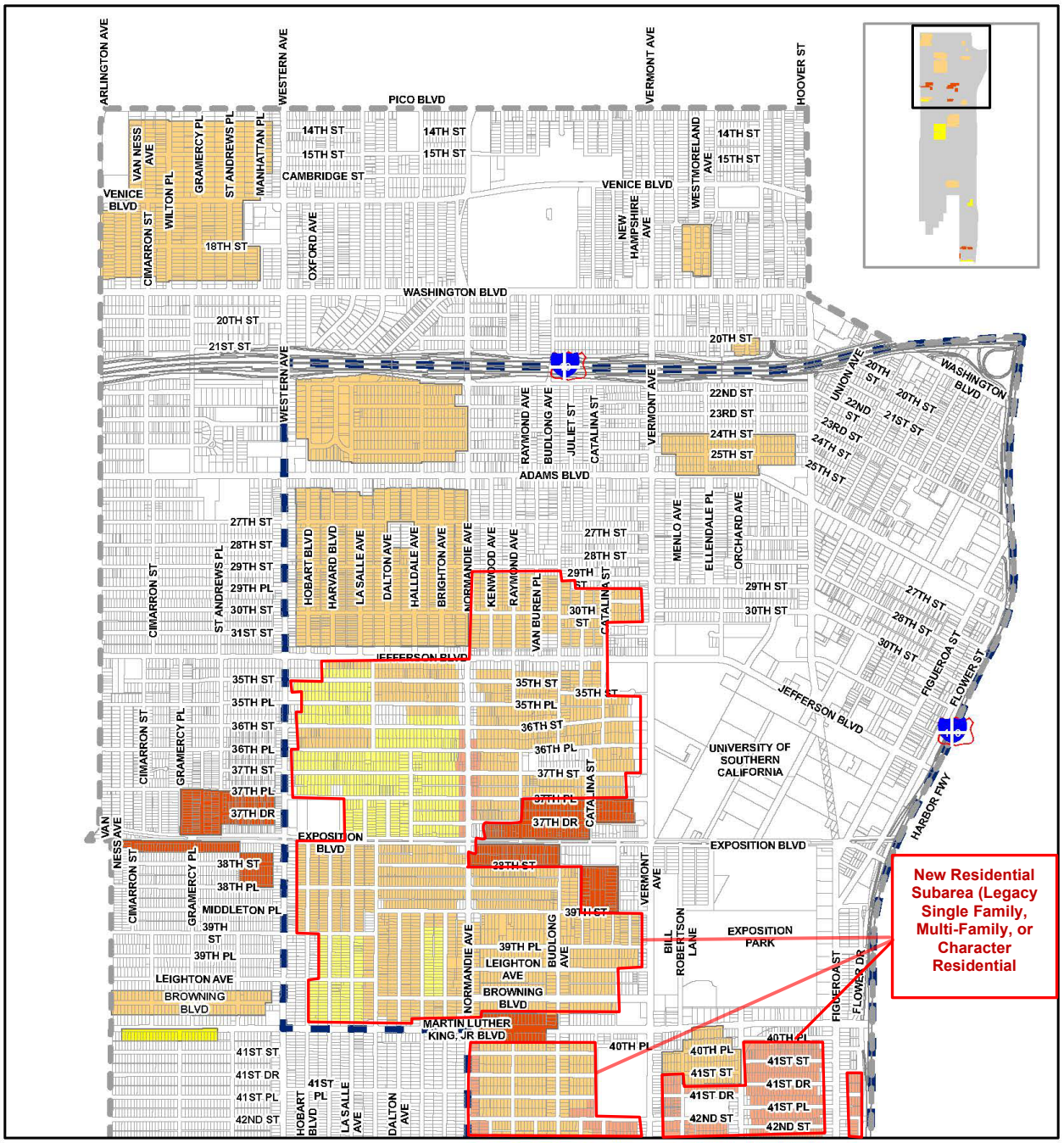



**Figure V-1, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea N - Multi-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

Chapter 5 - RESIDENTIAL SUBAREAS

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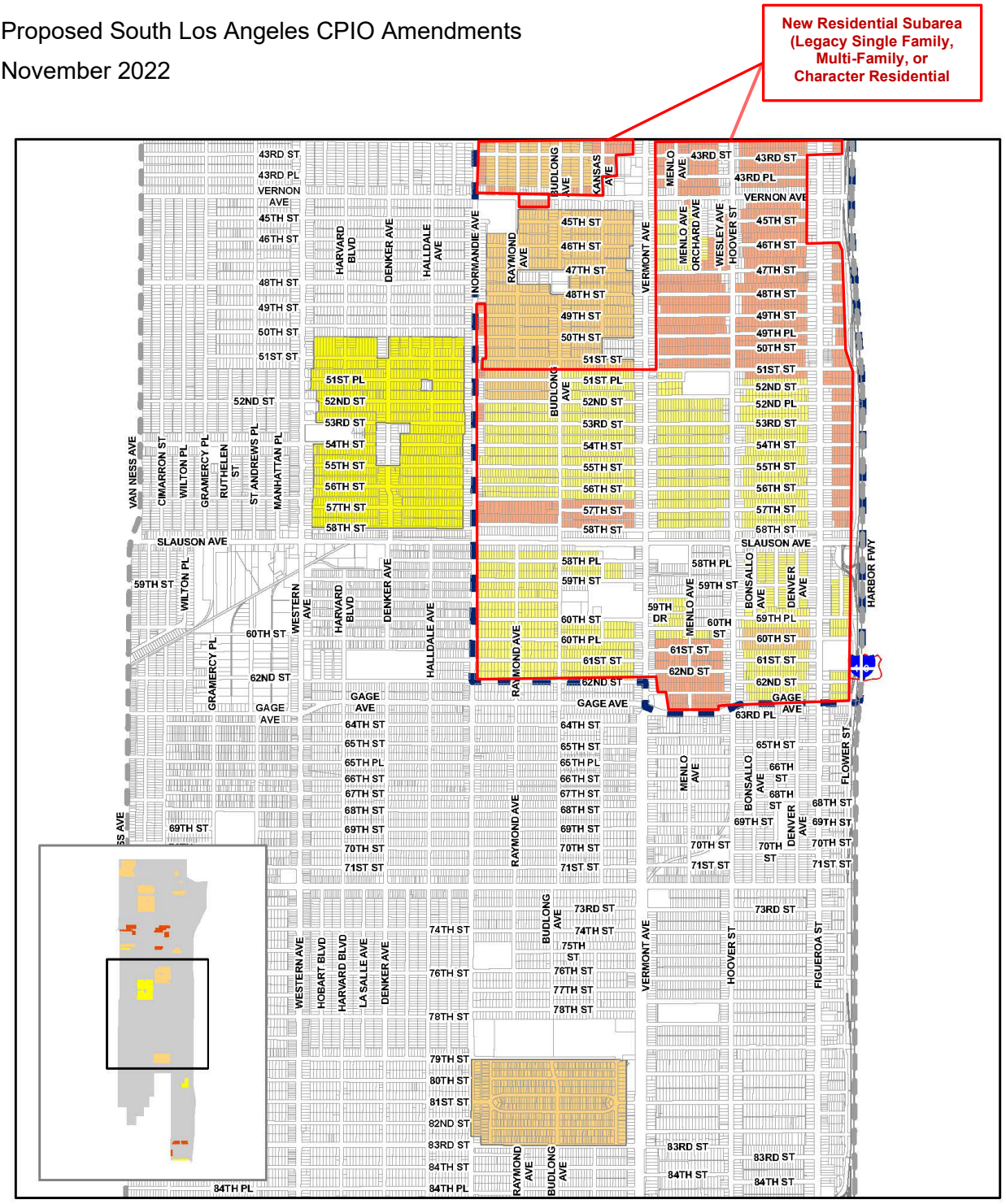



**Figure V-2, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

Chapter 5 - RESIDENTIAL SUBAREAS

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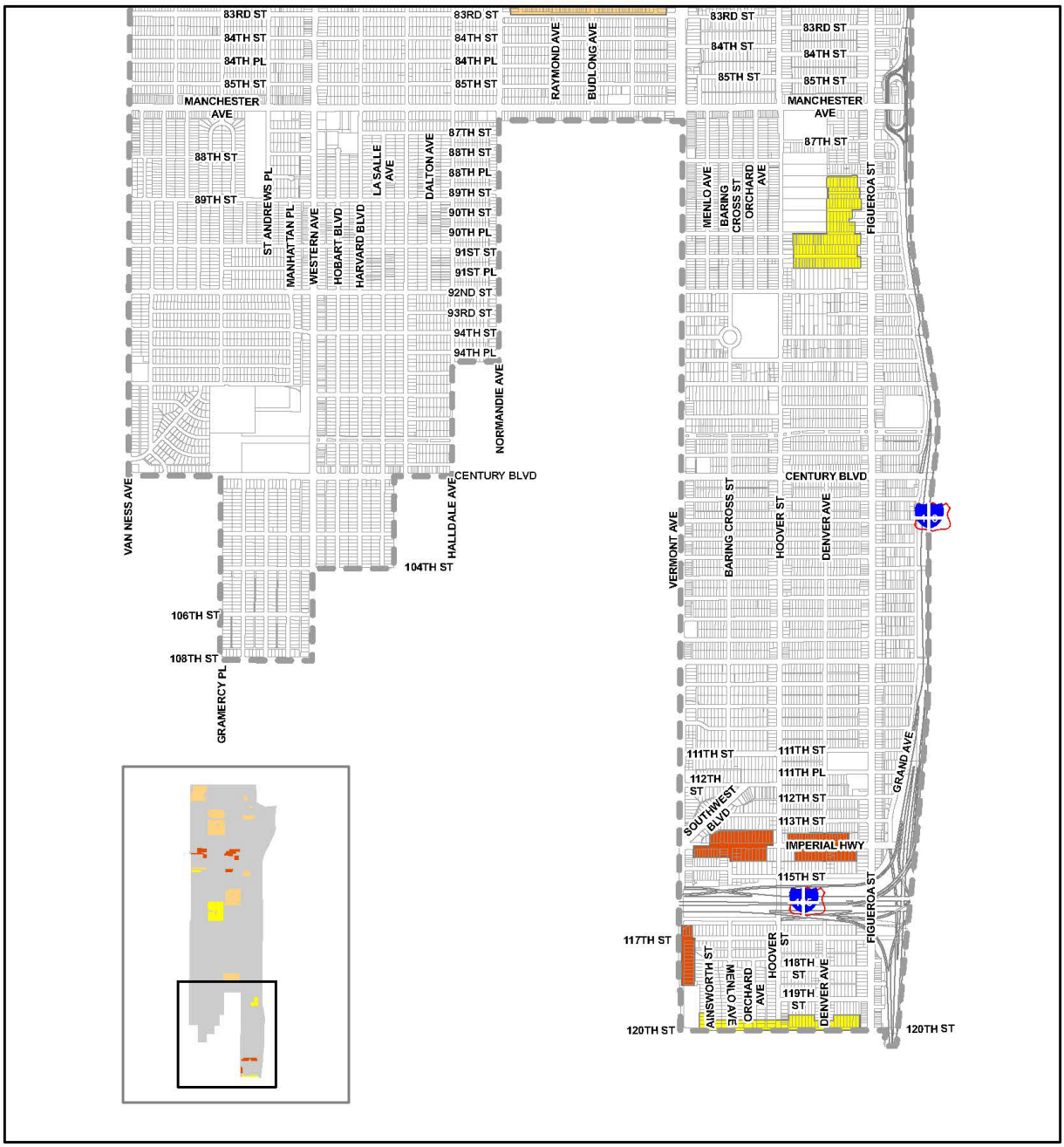



**Figure V-3, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea N - Multi-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

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Chapter 5 - RESIDENTIAL SUBAREAS

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## CHAPTER V - RESIDENTIAL SUBAREAS

*Amendments to Chapter V include adding a new "Section V-1 Applicability" section to establish the CPIO Protected Unit Area standards that implement provisions of the Housing Crisis Act, including a new determination from the Los Angeles Housing Department (LAHD) to ensure no net loss of residential units, replacement of certain protected units, and certain occupant protections. This new section also includes a provision to delay demolitions. All other changes to this chapter are either technical modifications or adjustments to ensure compatibility with the new section.*

*(Also see Exhibit B.2 for full text regarding CPIO Chapter V – Residential Subareas.)*

### Section V-1 ~~LAND USE REGULATIONS~~ APPLICABILITY

~~No additional land use regulations apply.~~

**A.** **Purpose.** The purpose of this section is to strengthen residential neighborhood stability and to promote the preservation of affordable housing.

**B.** **Designated Residential Subareas.** Only Residential Subareas within the "CPIO Protected Unit Area" (Figure V-1 and Figure V-2) are subject to Section V-1 C and Section V-1 D.

**C.** **Los Angeles Housing Department (LAHD) Determinations.** A determination issued by LAHD is required prior to the issuance of any building permit for Projects in Designated Residential Subareas, subject to the following provisions:

**1.** **No Net Loss.** Projects shall provide at least as many residential dwelling units as the greatest number of residential dwelling units that existed on the property within the past 5 years.

**2.** **Replacement of CPIO Protected Units.** Each CPIO Protected Unit shall be replaced on a one-for-one basis, containing at least the same floor area in addition to the same number of bedrooms and bathrooms, with an affordability level equaling like-for-like, or lower.

(a) In the absence of floor area documentation, floor area shall default to at least the average unit size of comparable CPIO Protected Units. Existing, proposed, and/or default floor area calculations shall be provided by the applicant and verified by the Department of City Planning.

(b) In the absence of occupant income documentation, and in lieu of the rebuttable presumption in CA Government Code 65915(c)(1)(3)(B), affordability levels shall default to the Extremely Low-Income income category.

(c) This provision does not apply to: (1) a Project that consists of an owner-occupied Single-Family Dwelling Unit on a site where a Single-Family

Dwelling unit is demolished, and (2) a Project that consists of 100% lower income units except Manager's Unit.

**3. Occupant Protections.**

(a) **Right to Remain.** All occupants of CPIO Protected Units being displaced by the Project have the right to remain in their unit until six months before the start of construction activities. Any existing occupants that are required to leave their units shall be allowed to return at their prior rental rate if the demolition does not proceed and the property is returned to the rental market.

(b) **Relocation.** All Lower Income Household (as defined in California Health and Safety Code Section 50079.5) occupants of CPIO Protected Units are entitled to relocation benefits subject to Chapter 16 (commencing with Section 7260) of Division 7 of Title 1.

(i) Project applicants required to provide relocation benefits shall develop, submit, and adhere to an approved relocation plan and hire a city-approved consultant to provide required relocation services.

(c) **Right to Return.** All Lower Income Household (as defined in California Health and Safety Code Section 50079.5) occupants of CPIO Protected Units are entitled to the right to return ("right of first refusal") to a replacement unit at the completed Project. If at the time of lease up or sale (if applicable) of a replacement unit, a returning occupant remains income eligible for an "affordable rent" (as defined in California Health and Safety Code Section 50053) or if for sale, at an "affordable housing cost" (as defined in California Health and Safety Code Section 50052.5), owner must also provide the replacement unit at the "affordable rent" or "affordable housing cost", as applicable.

(i) This provision does not apply to: (1) a Project that consists of an owner-occupied Single-Family Dwelling Unit on a site where a Single-Family Dwelling unit is demolished, and (2) a Project that consists of 100% lower income units except Manager's Unit.

(d) Refer to Appendix B for additional Tenant Protections Resources.

**D. Demolition and Permit Delay.** Except for the areas south of Martin Luther King Blvd within the "CPIO Protected Unit Area", no demolition permit shall be issued for any Project with existing structures more than 45 years old unless a new construction Project has been reviewed and approved by the Director of Planning pursuant to Section I-6. This provision does not apply to Projects with existing structures that are deemed hazardous or a public nuisance by the Department of Building and Safety, Los Angeles Police Department, or Los Angeles Fire Department

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## Section V-2. ~~DEVELOPMENT STANDARDS~~ LAND USE REGULATIONS

No additional land use regulations apply.

## Section V-23. DEVELOPMENT STANDARDS

Projects in the Residential Subareas are subject to the following development standards.

**A.** **Building Height.** In addition to the height standards established by the underlying zone and height district, Projects with new construction or additions shall comply with the following building step-back requirements:

1. **Subarea M (Legacy Single-Family Residential).** Except for properties zoned [Q]R4 (Faith Based), any story above the first story shall be stepped back a minimum of 10 feet from the first floor Primary Frontage facade or 30 feet from the Primary Lot Line, whichever is less restrictive.

2. **Subarea N (Multi-Family Residential).** No additional height regulations apply.

3. **Subarea O (Character Residential).** Except for properties zoned [Q]R4 (Faith Based) and R1R3 (Single Family - Rear Mass Variation Zone), the portion of a building above thirty feet shall be stepped back a minimum of 10 feet from the Primary Frontage façade.

**B.** **Building Density & Floor Area Ratio (FAR).** In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following density and FAR regulations:

1. **Density**

(a) **Subarea M (Legacy Single-Family)**

No additional density regulations apply.

(b) **Subarea N (Multi-Family Residential)**

No additional density regulations apply, except that Residential Projects in the Exposition Park Square Character Residential neighborhood (Figure V-C), shall be limited to a maximum density of 1 unit per 1,200 square feet of lot area (1/1200) in the R3 zone.

(c) **Subarea O (Character Residential)**

No additional density regulations apply, except that Residential Projects in the Exposition Park Square Character Residential neighborhood (Figure V-C), shall be limited to a maximum density of 1 unit per 1,200 square feet of lot area (1/1200) in the R3 zone.

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2. **FAR**

(a) **Subarea M (Legacy Single-Family), Subarea N (Multi-family Residential), and Subarea O (Character Residential)**

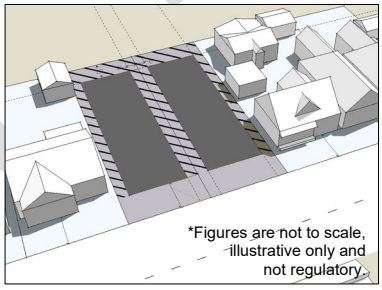
No additional FAR regulations apply.

**C. Building Disposition.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following disposition regulations:

1. **Bulk and Massing.**

(a) **Subarea M (Legacy Single-Family Residential) and Subarea N (Multi-Family Residential).** No additional bulk and massing regulations apply.

(b) **Subarea O (Character Residential)**




(i) For Projects on a Unified Lot, all buildings shall be designed to maintain the side and rear yard setback dimensions associated with the original individual lots set forth in C.2 (b)(ii) below. A Project may not rely on the status of the lots being Unified Lots to waive or modify setback,yard area, or any other development standards related to bulk and massing. (See figure for illustrative example of this regulation.)

(ii) Except for properties zoned [Q]R4 (Faith Based) and R1R3, the total cumulative length of any side elevation above the first floor shall not extend more than 60 percent of the lot depth or 80 feet, whichever is less.

2. **Setbacks**

(a) **Subarea M (Legacy Single-Family Residential) and Subarea N (Multi-Family Residential).** No additional setback regulations apply.

(b) **Subarea O (Character Residential)**

(i) **Front.** The Primary Frontage shall be located no closer to the street than the Primary Frontage of the adjacent residential building closest to the street, and shall be located no further from

the street than the Primary Frontage of the adjacent residential building farthest from the street.

(ii) **Side and Rear.** The side and rear setback dimensions shall be as set forth in the underlying zone, except as follows:

(1) New construction, including additions to existing buildings, on Unified Lots shall not encroach into side and rear setback areas associated with the original individual lots in accordance with C.1(b)(1) above.

(2) The side and rear yard setback requirements shall not apply to accessory buildings (including but not limited to, garages, recreation rooms) provided the following requirements are met:

(~~iii~~3) The accessory building's footprint shall not exceed10 percent of the overall square footage of the lot, the height shall not exceed 15 feet, and the building shall be a single story.

(~~iv~~4) The accessory building shall be detached from the main house and set back a minimum of 10 feet, as measured from the rear most façade of the main house.

(~~v~~5) In addition to the allowable yard projections in LAMC Section 12.22.C.20, loggias (covered walkways), gazebo structures and pools may encroach into the rear and side yard setback areas that are internal to Unified Lots.

(~~vi~~6) Where the yard setback dimensions in this Chapter V are more restrictive than those set forth in the underlying zone, including LAMC Sections 12.22.C.27 (Small Lot Subdivisions) and 12.08 (R1R3 Variation Zone), the more restrictive setbacks shall prevail.

(7) The accessory building requirements of this subsection (ii) shall not apply when in conflict with projects built under State ADU Law and LAMC Section 12.22 A.33.

3. **Parking Areas, Garages and Carports.** Projects with onsite parking shall conform to the following standards:

(a) **Subarea M (Legacy Single-Family Residential)**

(i) No parking areas shall be allowed between the Primary Frontage and the Primary Lot Line, except required driveways.

(ii) Detached or attached garages, parking areas, and carports associated with the construction of a new building shall be located behind any main building(s).

(iii) Projects that involve the construction of a new building(s) shall provide one additional on-site parking space for every bedroom over 3 bedrooms per dwelling unit. Within the "CPIO Protected Unit Area", notwithstanding LAMC Section 12.21 A.5(h), tandem parking shall not be limited to a depth of two cars and shall be located within designated driveways in accordance with state law.

(iv) Curb cuts shall be limited to the minimum number permitted as determined by LADOT and driveway widths shall be the minimum width permitted by the LAMC.

(b) **Subarea N (Multi-Family Residential)**

(i) No parking areas shall be allowed between the Primary Frontage and the Primary Lot Line, except for required driveways.

(ii) Detached garages and carports associated with the construction of a new building shall be located behind any main building(s).

(iii) Attached parking areas shall be located either underground (subterranean or semi-subterranean), or behind any main building(s).

(iv) Any semi-subterranean parking areas (i.e. parking podiums) shall include exterior façades that are integrated into the overall architecture of the building, and that are accompanied by a minimum three-foot landscape buffer that is landscaped with plants that, at maturity, adequately screen the parking area.

(v) Curb cuts shall be limited to the minimum number permitted as determined by LADOT and driveway widths shall be the minimum width permitted by the LAMC.

(c) **Subarea O (Character Residential)**

(i) No parking areas shall be allowed between the Primary Frontage and the Primary Lot Line, except for required driveways.

(ii) Detached garages and carports shall be located behind any buildings, except for single-family properties zoned R1R3, which shall comply with the detached garage regulations of LAMC Section 13.19.

(iii) Attached parking areas shall be located either underground (subterranean or semi-subterranean), or behind any buildings.

(iv) Any semi-subterranean parking areas (i.e. parking podiums) shall include exterior façades that are integrated into the overall architecture of the building, and that are accompanied by a minimum three-foot landscape buffer that is landscaped with plants that, at maturity, adequately screen the parking area.

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(v) Access driveways shall be taken from alleys or side-streets when present.

(vi) Driveway widths shall be the minimum allowed by the LAMC.

4. **Front Yards.** Residential front yards shall not be paved or used for vehicular parking or storage. Pavement shall be used only for walkways and driveways. Residential front yards shall be landscaped with plant materials, decomposed granite, turf block or a combination thereof. Residential front yards shall be open and not obstruct the views of the home from the street.

5. **Parkways.** Parkways, the area between the street and sidewalk, when present, shall be porous and landscaped and shall be covered by a pervious surface.

6. **Courtyards.** In Subarea O, a frontage of more than 100 feet shall incorporate a courtyard facing the street, at ground level, and open to the sky, that is at least 20 feet wide and 15 feet deep. For example, the building could be arranged on the lot in a U or L shape, around a central courtyard that faces a public street and is open to the sky.

7. **Site Assessment.** In coordination with the Urban Forestry Division, applicants shall provide an initial site assessment to evaluate and document the presence of existing trees. This assessment shall occur prior to a Project application being deemed complete and an accompanying report shall be included with the plans submitted for review and approval pursuant to Section I-6.

**D. Building Design.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following design regulations:

1. **Primary Frontage.** A primary building entrance shall be provided that is directly visible and accessible from the Primary Lot Line, or individual entrances from a centrally located or common-access courtyard accessible from the Primary Lot Line. The primary building entrance(s) shall be accentuated by a canopy, recess, unique building materials, or another Architectural Feature that denotes the entrance against the rest of the façade.

2. **Roof Forms.** Projects that involve the construction of additions or new detached dwelling units shall utilize roof forms that are consistent with the existing roof forms of the main building or the prevailing roof forms of the surrounding neighborhood. For example, if a property is developed with a structure that has a 4/12 pitch gabled roof, the addition or second dwelling unit shall utilize the same gable roof pitch.

3. **Building Materials**

(a) **Subarea M (Legacy Single-Family).** Projects shall utilize uniform building materials across all exterior facades, unless this requirement would conflict with requirements associated with new construction associated with Eligible Historic Resources. For example, if a property is developed with a house with exterior wood siding, an addition or new

detached dwelling unit on the site shall utilize the same or substitute with materials that give the same appearance.

(b) **Subarea N (Multi-Family Residential) and Subarea O (Character Residential)**

(i) Projects shall utilize at least two building materials across all exterior façades of the building (e.g., wood window sashes, smooth stucco, wood, brick).

(ii) Rough texture stucco (e.g., lace, heavy dash, tunnel dash, heavy sand float) is prohibited.

4. **Articulation**

(a) **Subarea M (Legacy Single-Family).** No additional articulation regulations apply.

(b) **Subarea N (Multi-Family Residential) and Subarea O (Character Residential).** All exterior building walls shall provide a break in the plane or a change in material at least every 20 feet in horizontal length and every 15 feet in vertical length. Fenestration that is recessed a minimum of two inches from the outside wall may be counted as a break in plane.

~~D~~E. **Historic Resources.** Any Project that qualifies as an Eligible Historic Resource shall comply with Chapter 1, Section I-6.C.5 of this CPIO.

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# APPENDIX B
# TENANT PROTECTIONS RESOURCES

## OVERVIEW

As described in Section V-I C.3., Occupant Protections, the following is a resource for Tenant Protections. This resource includes a description of Relocation, Remedies/Private of Action, Right to return/Right of First Refusal, and Tenant Harassment as described in the Los Angeles Municipal Code. Rent Stabilization Ordinance, Tenant Habitability Program Ordinance, and the Housing Crisis Act. Compliance with tenant protections shall be achieved through the Los Angeles Housing Department (LAHD) and any relevant department which holds such jurisdiction. It is intended to reflect the most up to date resources and to be updated as additional laws and procedures come into practice.

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*(Online resources may be accessed by scrolling over the hyperlinked text.)*

# Appendix B –TENANT PROTECTIONS RESOURCES

| Topic | Rent Stabilization Ordinance<br>LAMC Chapter XV<br>Section 151.00<br><br>Tenant Habitability Program Ordinance<br>LAMC, Chapter XV, Article 2 | Housing Crisis Act<br>LAMC Chapter IV, Article 19<br><br>CA Gov Code Section 66300 et seq. |
|---|---|---|
| Relocation | See: RSO Relocation Assistance Bulletin<br><br>Any tenant affected by Primary Renovation Work shall have the option to voluntarily terminate the tenancy in exchange for permanent relocation assistance as set forth in a Tenant Habitability Plan accepted by LAHD only if the work takes 30 or more days. If work takes less than 30 days tenants get temporary relocation;<br><br>When the eviction is due to condominium conversion, demolition or the property is going to be permanently removed from the rental housing market (Ellis Act), Landlords must file Notice of Intent to Withdraw Units from Rental Housing Use;<br><br>The amount of relocation assistance depends on whether the tenant is an Eligible or Qualified tenant, the length of tenancy, and the tenant's income. | See: SB 8; SB 8 Application; SB 8 Occupant Packet; SB 8 RUD Information Sheet<br><br>Occupants of Protected Units also are entitled to receive relocation pursuant to state or local law, whichever provides greater assistance |
| Remedies / Private Right of Action | Any person who demands, accepts or retains any payment of rent in excess of the maximum rent or maximum adjusted rent in violation of the provisions of this chapter, or any regulations | Does not include Remedies language |

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| | or orders promulgated hereunder, shall be liable in a civil action to the person from whom such payment is demanded, accepted or retained for damages of three times the amount by which the payment or payments demanded, accepted or retained exceed the maximum rent or maximum adjusted rent which could be lawfully demanded, accepted or retained together with reasonable attorneys' fees and costs as determined by the court.<br><br>Any person violating any of the provisions, or failing to comply with any of the requirements, of this chapter shall be guilty of a misdemeanor.<br><br>Any person who willfully or knowingly with the intent to deceive, makes a false statement or representation, or knowingly fails to disclose a material fact, in a notice or declaration required under Subsection C. or I. of Section 151.09 or in any declaration, application, hearing or appeal permitted under this chapter, including any oral or written evidence presented in support thereof, shall be guilty of a misdemeanor.<br><br>Nothing in this Article shall be construed to deprive a person of due process rights guaranteed by law, including, but not limited to, a right to appeal the Department's determination regarding a Tenant Habitability Plan to a hearing officer. | Note: While SB 8 does not include Remedies language, any eviction will have a private cause of action under a general umbrella of "wrongful eviction." |
| Right to Return/<br><br>Right of First Refusal | Right to return to the same unit if a demolition does not occur | Both a right of first refusal to the new units and a right of return to the original units if demolition does not happen.<br><br>Right of first refusal for lower-income households:<br><br>(ii) A right of first refusal for a comparable unit available in the new housing development affordable to the household at an affordable rent, as defined in Section 50053 of the Health and Safety Code, or an affordable housing cost, as defined in 50052.5. |
| Tenant Harassment<br><br>LAMC Chapter IV, Section 151.33 | The Tenant Anti-Harassment Ordinance (TAHO) establishes a private right of action for tenants experiencing harassment (as defined in the ordinance) and it specifies the civil penalties that tenants can collect. It does not prohibit properties or owners with harassment claims or convictions from developing housing. | Does not include language restricting a project moving forward in instances where there is a history of tenant harassment on a property. |

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# EXHIBIT B.2:

# Proposed CPIO Chapters I, III, V and Appendix B (Full Text)

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

**EXHIBIT B.2**

Proposed Changes (Full Text Version)

# South Los Angeles
# Community Plan Implementation Overlay District
(South LA CPIO District)

**Ordinance No. 185927**

**Effective Date December 29, 2018**

Technical Clarification April 5, 2019

Amended by Ordinance No. _____

Effective _____

## TABLE OF CONTENTS


| | |
|---|---|
| Chapter I | Function of the CPIO District |
| Chapter II | Corridors Subareas |
| Chapter III | TOD Subareas |
| Chapter IV | Industrial Subareas |
| Chapter V | Residential Subareas |
| Appendix A | Environmental Standards |
| APPENDIX B | Tenant Protections Resources |


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## CHAPTER I – FUNCTION OF THE CPIO DISTRICT

### Section I-1. SOUTH LOS ANGELES CPIO DISTRICT AUTHORITY AND BOUNDARIES

Pursuant to Los Angeles Municipal Code (LAMC) Section 13.14, the City Council establishes the South Los Angeles Community Plan Implementation Overlay District (South Los Angeles CPIO District). The boundaries of the South Los Angeles CPIO District are identical to the boundaries of the South Los Angeles Community Plan Area (Community Plan Area) as adopted on November 22, 2017 (Council File No. 17-1054) and shown on Figure I.



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Figure 1
CPIO District Boundary



**CORRIDORS SUBAREAS**
- Subarea A - Neigborhood-Serving Corridor
- Subarea B - Parkway Corridor
- Subarea C - General Corridor
- Subarea D - Commercial Corridor

TOD SUBAREAS
- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional

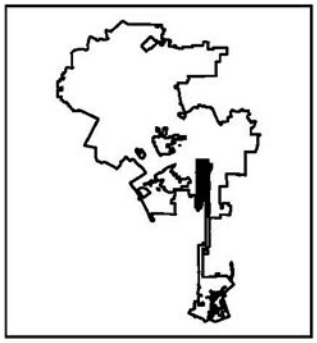
**INDUSTRIAL SUBAREAS**
- Subarea I - Hybrid Limited
- Subarea J - Hybrid
- Subarea K - Compatible Industrial
- Subarea L - Industrial Innovation

**RESIDENTIAL SUBAREAS**
- Subarea M - Legacy Single-Family (R2)
- Subarea N - Multi-Family
- Subarea O - Character Residential

- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

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## Section I-2. PURPOSES

The purposes of the South Los Angeles CPIO District are as follows:

**A.** To implement the goals and policies of the South Los Angeles Community Plan.

**B.** To provide supplemental development regulations tailored to the Community Plan Area in order to promote better urban design and to ensure that development enhances the aesthetic character of the community, maintains compatible land uses, and appropriate development scale, intensity, and density.

**C.** To create approval processes, including a ministerial administrative clearance process, which enables infill development that will positively impact communities in conformance with these regulations.

**D.** To ensure appropriate height, intensity, and transition in order to protect residential neighborhoods from incompatible development and uses along the commercial corridors.

**E.** To encourage mixed-income and affordable housing development and minimize potential displacement.

**F.** To encourage a diversified range of retail and services that meets the needs of the community.

**G.** To improve the health and welfare of the community by limiting certain uses, including those uses that are over-concentrated or that rely on a standardized development typology dominated by excessive automobile orientation.

**H.** To foster revitalization of properties along the commercial corridors throughout the Community Plan Area.

**I.** To promote and facilitate revitalization of properties in close proximity to major transit stops including the Metro's Expo Line Light Rail Transit (LRT), Green Line LRT and Metro Rapid bus lines.

**J.** To encourage the creation of pedestrian-friendly, multi-modal transit centers where jobs, housing, and goods and services are all located within walking distance of transit.

**K.** To discourage non-industrial uses in industrial districts and preserve viable industrial land for the emergence of innovative new clean technology, information technology, and green technology uses.

**L.** To protect residential uses from adjacent industrial uses through appropriate screening, buffering and use compatibility.

**M.** To preserve and protect neighborhood identity, including protecting both designated and eligible non-designated historic resources, and distinctive character defining elements of existing development.



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**N.** To promote the overall health and sustainability of the community that reside, work, and recreate in the Community Plan Area.

## Section I-3. SUBAREAS

The South Los Angeles CPIO District contains 15 Subareas as shown on Figure I and as precisely delineated by solid boundary lines on the CPIO District Boundary Maps, attached to the ordinance establishing the South Los Angeles CPIO District. The Subareas are contiguous or non-contiguous parcels characterized by common overarching Community Plan themes, goals, and policies, and are grouped by a common boundary. The Subareas are described below.

### Corridors Subareas A, B, C and D

Corridors Subareas A, B, C and D seek to foster continued investment in the various commercial corridors throughout the Community Plan Area. These Subareas encourage a greater diversity of commercial goods and services for the community by encouraging certain commercial uses, and by providing restrictions for over-concentrated uses through a combination of parking incentives, land use regulations and development standards. Each Subarea contains certain basic development standards to ensure that any new development is compatible with the best attributes of each corridor's urban form.

The four Corridors Subareas are shown on Figure II-1, II-2 and II-3 and are summarized as follows:

#### Corridors Subarea A ("Neighborhood-Serving Corridor")

The Neighborhood-Serving Corridor Subarea allows for more multi-family housing and a refined range of commercial uses that serve the needs of the surrounding neighborhood. Development standards promote neighborhood activity and facilitate a more pedestrian-oriented environment.

#### Corridors Subarea B ("Parkway Corridor")

The Parkway Corridor Subarea is primarily residential in character and offers incentives for 100 percent residential affordable housing development. Neighborhood-serving commercial uses are encouraged.

*(As of the date of adoption of this Ordinance, no properties are designated Subarea B in the South Los Angeles Community Plan Area.)*

#### Corridors Subarea C ("General Corridor")

The General Corridor Subarea allows for a broad range of commercial uses and also allows multi-family residential development.



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**Corridors Subarea D ("Commercial Corridor")**

The Commercial Corridor Subarea is applied to major corridors that are auto-oriented and predominantly commercial, and that have high vehicle traffic. This Subarea allows for a broad range of commercial uses and requires commercial uses for new development at the ground floor.

**Transit-Oriented Development (TOD) Subareas E, F, G and H**

TOD Subareas E, F, G and H maximize the presence of fixed light rail transit and Metro Rapid bus lines within the community by providing increased housing and employment opportunities and encouraging quality retail and service amenities. Building upon the community's rich transit infrastructure, these TOD Subareas promote a mix of uses including residential, employment and commercial shopping opportunities within walking distance of light rail transit stations and major bus intersections in order to encourage non-automobile based mobility methods and to reduce regional greenhouse gas emissions. These Subareas encourage increased housing through the use of various tools and programs.

Each TOD Subarea has different levels of density, height and massing tailored to the context of each specific station area, ranging from TOD Low to TOD Regional. These Subareas include a tiered incentive structure that prioritizes mixed-income and 100 percent affordable housing and seeks to ensure replacement units on the project site. Together these incentives are intended to ensure that low-income, transit dependent residents are able to continue to live in these transit centers. Throughout the TOD Subareas, development and design standards provide for well-designed, pedestrian-oriented projects that are appropriate to the scale and context of each specific transit neighborhood. In all TOD Subareas, certain commercial uses are encouraged so as to provide goods and services not adequately provided in the South Los Angeles CPIO District.

The four TOD Subareas are shown in Figure III-1, III-2 and III-3 and are summarized as follows:

**TOD Subarea E ("TOD Low")**

The TOD Low Subarea is located in close proximity to Metro light rail station or Metro Rapid bus intersections and is characterized by lower intensity development that compliments the surrounding low density and low scale residential neighborhoods.

**TOD Subarea F ("TOD Medium")**

The TOD Medium Subarea is located in close proximity to Metro light rail stations or major Metro Rapid bus intersections. This Subarea offers moderate incentives for projects that include affordable housing.

**TOD Subarea G ("TOD High")**

The TOD High Subarea is located in close proximity to select Metro light rail stations. This Subarea offers incentives greater than those offered in the TOD Medium subarea for projects that include affordable housing.



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**TOD Subarea H ("TOD Regional")**

The TOD Regional Subarea allows for higher intensity commercial and mixed-use development that would provide greater housing and employment opportunities and offers the greatest incentives for projects that include affordable housing.

*(As of the date of adoption of this Ordinance, no properties are designated Subarea H in the South Los Angeles Community Plan Area.)*

**Industrial Subareas I, J, K and L**

Industrial Subareas I, J, K and L seek to preserve and revitalize industrial land throughout South Los Angeles. The industrial land in South Los Angeles is a tremendous asset in generating employment and economic investment, and in maintaining a job/housing balance. The Industrial Subareas preserve appropriately located land suitable to accommodate existing, new and relocating industrial firms, including space for small-scale or niche manufacturing and emerging green technologies. These Subareas 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 uses allowed. These Subareas also seek to protect residential and other sensitive uses located adjacent to industrially zoned land from impacts associated with the incompatibility of uses. These Industrial Subareas also encourage a complementary mix of light manufacturing and commercial activity along certain industrial corridors in order to support economic development and jobs generation.

The four Industrial Subareas are shown on Figure IV-1 and IV-2 and are summarized as follows:

**Industrial Subarea I ("Hybrid Limited Industrial")**

The Hybrid Limited Industrial Subarea retains a focus on jobs by allowing for a diversity of light industrial and commercial uses. Mixed-use projects may include live/work uses or limited residential with no more than 30 percent of the building's floor area for residential uses. The Hybrid Limited Industrial Subarea is distinguished from the Hybrid Industrial Subarea by its limits on residential floor area.

**Industrial Subarea J ("Hybrid Industrial")**

The Hybrid Industrial Subarea allows for a mix of uses, including light industrial and commercial uses, as well as live/work and residential uses. The Hybrid Industrial Subarea does not include limits on residential floor area.

**Industrial Subarea K ("Compatible Industrial")**

The Compatible Industrial Subarea is applied to industrial land uses located adjacent to residential neighborhoods, which therefore require greater sensitivity through development standards and limitations on allowed uses. This Subarea allows light industrial and commercial uses, while restricting noxious and other incompatible uses.



Black text = Existing CPIO text
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Red text = New CPIO text

**Industrial Subarea L ("Industrial Innovation")**

The Industrial Innovation Subarea protects viable industrial areas. This Subarea allows a broad range of industrial uses that support the City's employment base, and limits non-industrial uses. This Subarea is important to provide land for existing businesses and industry, as well as emerging businesses in clean and green technology, research and development, and food production, among others. Use restrictions limit non-industrial uses from encroaching into the stable industrial districts to ensure the economic sustainability of the community and the City.

*(As of the date of adoption of this Ordinance, no properties are designated Subarea L in the South Los Angeles Community Plan Area.)*

**Residential Subareas M, N and O**

Residential Subareas M, N and O focus on encouraging well-designed projects that are compatible with the surrounding neighborhood scale and that enhance neighborhood character. The three Residential Subareas are shown on Figure V-1, V-2 and V-3 and are summarized as follows:

**Residential Subarea M ("Legacy Single-Family")**

The Legacy Single-Family Subarea preserves the single-family character of certain lower density neighborhoods. Development standards ensure that building mass and setbacks keep new development projects in balance with the existing environment.

**Residential Subarea N ("Multi-Family")**

The Multi-Family Subarea establishes development standards for higher density neighborhoods in order to ensure that new development projects are well-designed and represent an improvement for their respective neighborhoods.

**Residential Subarea O ("Character Residential")**

The Character Residential Subarea includes neighborhoods that have an abundance of historically and architecturally significant buildings. Development standards within this Subarea guide the ongoing maintenance of these structures, and regulations ensure that new development projects complement the surrounding context, including protecting patterns of historic parcelization. Eligible historic resources are subject to an additional level of review.

## Section I-4. DEFINITIONS

Whenever the following terms are used in this ordinance, they shall be construed as defined in this Section I-4. Words and phrases not defined in this section shall be construed as defined in Chapter 1 of the LAMC, including, but not limited to, Sections 12.03 and 14.4.2. The definitions set forth in this ordinance that reference, or incorporate by reference, other statutes or ordinances are deemed to be amended when those statues or ordinances are amended from time to time.

## A. General Definitions

**Active Floor Area** – Ground Floor area that is directly accessible from a building's Primary Frontage, and that is dedicated to any of the following: Commercial Uses, residential lobbies, Community Facilities, or Pedestrian Amenities.

**Administrative Clearance** – A ministerial approval for a Project in a South Los Angeles CPIO District Subarea that is obtained pursuant to Section 1-6.C.2 of this ordinance.

**Alcohol Sales, Off-Site –** Any establishment licensed by the Department of Alcoholic Beverage Control to sell or otherwise dispense alcoholic beverages for consumption off-site of the premises.

**Architectural Feature –** An aesthetic element of a building's design that is integral to the overall style of architecture, but is not considered habitable, or is otherwise counted as part of a building's floor area.

**Auto-Related Use** – A Car Wash, or any of the following uses, as defined in LAMC Section 12.03: automotive use, automobile dismantling yard, automobile and trailer sales area, automotive repair, and automotive fueling and service station. This term does not include New Franchise Automobile Sales, the retail sales of new automobile parts, or electric vehicle charging stations as defined in Government Code Section 65850.7.

**Bank** – A financial institution that is regulated by the Office of the Controller of the Currency, the Federal Reserve, or the Federal Deposit Insurance Corporation (FDIC) or chartered by the California Department of Business Oversight, and whose deposits are insured by the FDIC, and licensed to conduct business in the state of California. This term does not include short-term loan facilities and establishments that provide only ATM access or check cashing.

**Base** – The maximum density, height or floor area ratio (FAR) permitted on a Project site by this CPIO District, excluding any available CPIO Bonus.

**Building Footprint** – The area under the horizontal projection of the roof that is surrounded by the exterior walls or columns of a building, exclusive of courtyards.

**Canister/Can/Cabinet Sign** – An opaque or clear sign with illuminated or non-illuminated text, logos, or symbols placed on, behind, or extruded through the plastic face of an enclosed cabinet attached to the face of building.

**Car Wash** – An establishment that provides services related to the on-site cleaning of motor vehicles. This business may include self-service cleaning equipment, or fully automated equipment (such as an automotive laundry or wash rack that is power driven or involves steam cleaning machinery).

**CEQA** – The California Environmental Quality Act, Public Resources Code Sections 21000, *et seq.*, and the guidelines adopted in California Code of Regulations, Title 14, Chapter 3, Sections 15000 – 15387 (CEQA Guidelines).

**Check Cashing Facility and/or Payday Lender** – Lending facilities offering small, unsecured, short-term loans, or a use that primarily consists of check cashing services for a fee.

**Commercial Uses** – Those uses first permitted in the CR, C1, C1.5, C2, C4, or C5 Zones, including Community Facilities and hotels. This term does not include residential uses, with the exception of hotels.

**Community Facilities** – Any use whose primary purpose is to provide government, non-profit, or not-for-profit assistance to the general public. Examples include government offices and services or privately funded services or charities that are provided to the public at a free or subsidized rate, child care centers, job assistance centers, business assistance centers, libraries, schools, adult day cares, Health Centers, museums, cultural centers, gyms or recreation centers, restrooms open to the general public and rooms available to the general public for community meetings. Public parking structures are Community Facilities when they include another Community Facility use, such as child care centers or community meeting rooms. Community Facilities include any related administrative offices.

**Community Plan** – The South Los Angeles Community Plan.

**CPIO Approval** – An approval issued under Section I-6.C of this ordinance that is an Administrative Clearance, a CPIO Adjustment, or a CPIO Exception.

**CPIO Affordable Housing Project** – A Project of five residential units or more, which may also include Commercial Uses, that qualifies as either a CPIO 100 Percent Affordable Housing Project or a CPIO Mixed-Income Housing Project.

**CPIO Bonus** – Any available increase over the Base permitted to be built on a Project site by this CPIO District.

**CPIO 100 Percent Affordable Housing Project** – A project in which 100 percent of the residential dwelling units, excluding any manager unit(s), are Restricted Affordable Units.

**CPIO Mixed-Income Housing Project** – A project comprised of a mix of market-rate and Restricted Affordable Units at the following percentages:

1. For TOD Subarea E ("TOD Low"), a minimum of 21 percent of the total units in the Project, excluding any manager unit(s), are designated for Lower Income households, or 12 percent for Very Low Income households, or 9 percent for Extremely Low Income Households

2. For TOD Subareas F ("TOD Medium"), G ("TOD High), and H ("TOD Regional") a minimum of 25 percent of the total units in the Project, excluding any manager unit(s), are designated for Lower Income Households, or 15 percent for Very Low Income households; or 11 percent for Extremely Low Income Households.

**CPIO Protected Unit** – A residential dwelling unit within a "CPIO Protected Unit Area" (Figure V-1, Figure V-2) that is or was, within the last five years: (1) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; (2) subject to any form of rent or price control through a public entity's valid exercise of its police power; (3) rented by lower or very low income households; (4) withdrawn from rent or lease per the Ellis Act, within the past 10 years.

*(As of the date of adoption of this Ordinance, the definition of a CPIO Protected Unit shall only apply to properties within the Residential Subareas depicted in Figure V-1 and Figure V-2 of the CPIO.)*

**Creative Office Use** – A business establishment that is primarily involved in the generation or utilization of knowledge and information or the development of creative property, including advertising, architectural services, computer software design, engineering, graphic design, interior design, and landscape design uses.

**Credit Union** – A "Federal credit union" or "State credit union" as defined by 12 United States Code Section 1752.

**Density Bonus Project** – A Project that meets the eligibility requirements of and elects to use the density increases, waivers and incentives set forth in LAMC Section 12.22 A.25.

**Designated Historic Resource** – A building, structure, landscaping element, or natural feature listed or designated as a historical resource, either individually, or as a contributor to a district, through a local, state or federal designation program.

**Drive-Through Establishment** – Any business used for the execution of a sale, or business transaction, to an individual in a motor vehicle at the time of the sale or transaction.

**Eligible Historic Resource** – A building, structure, object, site, landscape, natural feature, or historic district identified as eligible for listing either individually, or as a contributor to an eligible historic district under a local, state or federal designation program, through SurveyLA (*The Los Angeles Historic Resources Survey*), or another historical resource survey completed by a person meeting the Secretary of the Interior's Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic Resources (OHR). This term does not include a non-contributor to an eligible historic district.

**Extremely Low Income Households** – As defined in Health and Safety Code Section 50106.

**Feather Sign** – A freestanding or mounted sign that is supported by a flexible or semi-flexible full or partial frame within which is a material constructed of vinyl, paper, or other wind-resistant and moveable materials.

**Freestanding Restaurant with Drive-Through** – A restaurant use or uses by a single tenant, or multiple tenants that share the same kitchen, located on its own lot or within a shopping center complex, that includes a drive-through.

**Full-Service Drug Store** – A retail establishment, of 10,000 square feet or more of floor area, where medical prescriptions, drugs, medical supplies, and other merchandise is sold.

**Full-Service Fitness Center** – A facility, of 10,000 square feet or more of floor area, that provides the general public services, gym-related equipment, and instructional training related to personal physical fitness. This term does not include massage parlors and spas.

**Ground Floor** – The floor level which is within three feet above or below curb level, accessible to the street, has frontage on a Primary Lot Line, and is at least 25 feet in depth or is the total depth of the building, whichever is less.

**Gun Shop** – A business establishment lawfully authorized to engage in the retail sale, leasing, purchasing, lending, or the commercial storage of guns, firearms, or ammunition.

**Health Center** – A facility that provides health care and is certified by the United States Department of Health and Human Services, Health Resources and Services Administration (HRSA) as a Federally Qualified Health Center (FQHC), or FQHC Look-Alike as defined by HRSA.

**LAMC** – Los Angeles Municipal Code.

**LADOT** – Los Angeles Department of Transportation

**Light Manufacturing and Assembly** – A business establishment where any on-site processing, fabricating, assembly or disassembly of items takes place within an enclosed building so that all noise, dust, odors and other potential nuisances from operations are contained entirely on-site. Typical items for processing, fabricating, assembly or disassembly under this use include, but are not limited to, apparel, apparel accessories, computers, decorations, electronic devices, food, instruments, jewelry and textiles. This term does not include Noxious Uses.

**Lower Income Households** – As defined in Health and Safety Code Section 50079.5(a).

**Major Retailers** – A business establishment that provides 50,000 square feet or more of a retail use as first allowed in the C1.5 zone.

**Media Production** – A business establishment that is engaged in the creation or production of film, television, video, audio, animation, or the editing of any related media content. This term includes any accessory private screening rooms. This term does not include movie theaters open to the general public.

**Mixed-Use Project** – A Project which combines multiple Residential Uses with one or more Commercial Uses, such as, retail, office, and Community Facilities in a single building or in a Unified Development.

**Motel** – An establishment primarily designed for the accommodation of motorists and which provides lodging with limited amenities and features on-site parking that is directly accessible and often visible from each unit. This term includes a motor court or motor lodge. This term does not include hotels as defined in LAMC Section 12.03.

**Multi-Purpose Cultural Facilities** – A facility designed to host a social gathering and consisting of multipurpose meeting and/or recreational facilities, typically consisting of one or more meeting or multipurpose rooms and a kitchen and/or outdoor barbecue facilities, that are available for use by various public or private groups for activities, such as meetings, parties, weddings, receptions, exhibits and entertainment.

**New Franchise Automobile Sales** – A business establishment that generates a majority of its revenue from the authorized retail sale of vehicles obtained directly from the vehicle manufacturer. This term may include related ancillary uses such as used automobile sales, auto mechanic/repair, and Car Wash.

**Noxious Use** – An establishment which requires a permit from South Coast Air Quality Management District related to the following activities: petroleum refining, chemical manufacturing, plastics and resin

manufacturing, pharmaceutical manufacturing, paint and coatings, iron and steelmaking, secondary smelting and refining, metal manufacturing, electroplating, metal processing, chrome plating, circuit board manufacturing, oil and gas production wells and automobile manufacturing.

**Pawnshop** – An establishment engaged in the "pawnbroker" business as defined by Financial Code Section 21000.

**Pedestrian Amenities** – Any public or private improvement that facilitates direct, safe, attractive, accessible, and recreational walking. This term includes outdoor sidewalk cafes, Public Plazas, retail courtyards, water features, kiosks, paseos, arcades, patios, covered walkways, or spaces of outdoor dining or seating that are located on the Ground Floor, and that are accessible to and available for use by pedestrians.

**Primary Frontage** – The exterior building walls facing the Primary Lot Line. For the purposes of this definition, all exterior walls that intersect a plane parallel to the Primary Lot Line at 45 degrees or less shall be considered the Primary Frontage. When the Primary Lot Line is not straight, a line connecting the points where the secondary or side lot lines and the Primary Lot Line intersect shall be used.

**Primary Lot Line** – The property line of a lot that is contiguous with a public street. On lots fronting more than one public street, the Director of Planning shall determine the Primary Lot Line based upon neighborhood characteristics, including the designation of the abutting streets and the dimensions of the subject lot.

**Professional Office Uses** – An establishment that provides general office space for business services that require specialized training or professional certification including but not limited to accountant, appraiser, attorney, architect, landscape architect, engineer, surveyor, stockbroker, counselor, and psychologist. This term shall not include massage parlors and spas, medical or dental office uses or the sale or exchange of goods and merchandise.

**Project** – Any activity that requires the issuance of a building, grading, demolition or change of use permit, unless the activity consists solely of interior rehabilitation/repair work.

**Public Plaza** – A common open area for public use typically amenable to larger public gatherings and adjacent to active building uses that is located on the ground level with direct pedestrian access to the adjacent street; is at least 50 percent open to the sky; is unenclosed by any wall, fence, gate, or other obstruction across the subject property, includes at least one gathering space with a focal element such as a fountain or work of art and signs at each pedestrian access point that contain language substantially consistent with the following: "This Plaza is open to the public as required by the South Los Angeles CPIO District."

**Publicly Accessible Open Space** – Public Plazas, pocket parks, and passive and active recreation areas that are accessible for use by the general public at least during the hours of, 10:00 a.m. and 5:00 p.m. daily and signs at each pedestrian access point that contain language substantially consistent with the following: "This area is open to the public as required by the South Los Angeles CPIO District."

**Public Self Storage** – A "self-service storage facility" as defined by Business and Professions Code Section 21701(a).

**Recycling Collection** – A “recycling center” as defined by Public Resources Code Section 14520, or a “recycler” as defined by Public Resources Code Section 14519.5.

**Rehabilitation** – The act or process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions or features of the property which are significant to its historical, architectural, and cultural values.

**Research and Development** – Any establishment engaged in scientific and technical research leading to the development of new products and processes, including development/testing activities and prototype fabrication.

**Restricted Affordable Unit** – A residential unit for which the amount of rent is restricted by a covenant so as to be affordable to and occupied by Extremely Low, Very Low, or Lower Income Households, as determined by the Los Angeles Housing and Community Investment Department (“HCIDLA”).

**Residential Uses** – Those uses first permitted in any R zone, including dwelling units, guest rooms, and live-work units.

**Restoration** – The act or process of accurately recovering the form, features, and details of a property as it appeared at a particular period of time by means of the removal of later work or by the replacement of missing earlier work.

**Retail Sales** – Any establishment that sells either new or used goods to the final consumer of such new or used goods for household, institutional, or industrial uses as permitted by the underlying zone.

**Sensitive Land Uses** – Residences, schools and schoolyards, parks and playgrounds, athletic facilities, day or child care centers, nursing homes, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, and residential communities.

**Sit-Down Restaurant** – An establishment that sells food for consumption on the premises, or through incidental take-out service, and which has the following characteristics: a varied menu; table service with orders taken either at the table or the counter; and food served to tables using dishes and glasses.

**Smoke/Vapor Shops** – An establishment that primarily sells devices intended for smoking and/or tobacco products, including establishments that sell e-cigarettes or other devices used for the vaporization of oils, waxes, liquid nicotine, dry herbs or other e-liquids. This term does not include medical or recreational marijuana dispensaries.

**Street-Oriented Entrance** – A building entrance (or in the case of multi-tenant structures, multiple entrances) that is visible and directly accessible from the Primary Lot Line and that is enhanced with Architectural Features to denote the entrance from the rest of the façade.

**Swap Meet** – As defined by Business and Professions Code Section 21661. This term does not include farmer’s markets or garage or yard sales.

**Targeted Commercial Uses** – Banks, Credit Unions, child care facilities, Health Centers, Full-Service Fitness Centers, Full-Service Grocery Stores, and Sit-Down Restaurants as those terms are defined by this ordinance or the LAMC.

**Transit-Oriented Communities Project (TOC Project)** – A Project that meets the requirements of and elects to use the density increases, waivers and incentives set forth in LAMC Section 12.22 A.31 and its implementing guidelines.

**Unified Development** – A development of two or more buildings which have functional linkages such as pedestrian or vehicular connections, with common architectural and landscape features which constitute distinctive design elements of the development, and that appears to be a consolidated whole when viewed from adjoining streets. Unified Developments may include two or more contiguous parcels or lots of record separated only by a street or alley.

**Unified Lots** – Two or more legal lots owned by one or more owners, which through legal instrument are controlled or developed as one lot, such as lots subject to a covenant, known as a, "covenant to hold property as one parcel."

**Very Low Income Households** – As defined in Health and Safety Code Section 50105.

**Vocational School** – An establishment that provides job training and educational facilities for a variety of technical skills.

**Warehouse/Storage Building** – As defined by Commercial Code Section 7102. This term includes a cold storage facility.

## Section I-5. RELATIONSHIP TO OTHER ZONING REGULATIONS

**A.** In addition to the provisions in LAMC Section 13.14.B, the following exceptions apply unless expressly stated to the contrary in the CPIO Subarea regulations:

1. The North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District set forth in LAMC Sections 12.24.W.52 and 13.12.C.2 does not apply in Corridors Subareas A, B, C and D and TOD Subareas E, F, G and H.

2. The Greater Downtown Housing Incentive Area Ordinance set forth in LAMC Section 12.22.A.29 does not apply to Subareas E, F, and G.

3. The Mini-Shopping Center Commercial Corner Development Standards and Conditions of Operation set forth in LAMC Section 12.22.A.23 do not apply in any Subareas.

4. Except where expressly stated otherwise in the South Los Angeles CPIO District, small lot subdivision projects involving single-family dwellings shall be regulated pursuant to LAMC Section 12.22.C.27.

**B.** The maximum FAR available to Affordable Housing Incentive Projects located in Height District 1 shall also apply when located in Height District 2D.

**C.** Nothing in the South Los Angeles CPIO District is intended to override or conflict with any regulations in the LAMC or other ordinance establishing a park or Quimby fee or park or open space dedication requirement, including any provisions related to credits or fee and dedication calculations.



Black text = Existing CPIO text
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Red text = New CPIO text

**D.** Nothing in this South Los Angeles CPIO District is intended to override or conflict with any regulations in the LAMC that would otherwise require a conditional use permit.

**E.** Nothing in this South Los Angeles CPIO District is intended to override or conflict with any bicycle parking regulations.

**F.** Nothing in this South Los Angeles CPIO District is intended to override or conflict with the regulations set forth in LAMC 12.22.A.25 and 12.22.A.31 that provide bonuses, waivers and incentives for certain affordable housing projects.

**G**. If there are any conflicts between the provisions of the South Los Angeles CPIO regulating building height or transitional building height and any other zoning regulations, including the regulations set forth in LAMC 12.21.1 through 12.21.6, the provisions of the South Los Angeles CPIO shall govern.

**H**. The LAMC shall prevail when there are any conflicts between the provisions of the South Los Angeles CPIO and the provisions of Redevelopment Project Areas

**Section I-6. REVIEW PROCEDURES**

**A. Prohibition of Issuance of DBS Permits Prior to CPIO Approval.** The Department of Building and Safety (DBS) shall not issue a permit for any Project within a South Los Angeles CPIO District Subarea (in whole or in part), unless the Project has been reviewed and approved in accordance with this Section I-6.

**B. Filing Requirements for Multiple Approvals.** When an applicant applies for any discretionary approval under LAMC Chapter 1 for a property located (in whole or in part) in a CPIO District Subarea, the applicant shall also apply for a CPIO Approval pursuant to Subsection C, below. A CPIO Adjustment or a CPIO Exception shall be a quasi-judicial approval for purposes of LAMC Section 12.36.A, and shall be processed pursuant to the procedures in LAMC Section 12.36, if applicable.

**C. CPIO Approval.** All Projects within a South Los Angeles CPIO District Subarea (in whole or in part) shall obtain an Administrative Clearance, unless a CPIO Adjustment or CPIO Exception is otherwise required, to demonstrate compliance with the South Los Angeles CPIO District, including the Environmental Standards set forth in Section I-8 and Appendix A. For any requirement for which the Project cannot demonstrate compliance, the Project shall obtain a CPIO Adjustment or CPIO Exception, if permitted by the South Los Angeles CPIO District. An application for a CPIO Approval shall be reviewed and approved pursuant to LAMC Section 13.14.G, including as its requirements are modified and supplemented below:

1. **Content of Application for a CPIO Approval.** In addition to any other information or documents required under LAMC Section 13.14.G.1, an applicant shall provide, at a minimum, two sets of detailed permit drawings and any other exhibits deemed necessary to demonstrate compliance with all applicable provisions of the CPIO District. Each application submitted for a CPIO Adjustment, or a CPIO Exception shall clearly identify and list all of the adjustments and exceptions requested.

2. **Administrative Clearance.** In addition to the requirements in Section 13.14.G.2, the

following shall apply:

(a) **Director Approval.** The Director shall grant an Administrative Clearance after reviewing the Project and finding that it is in compliance with all applicable provisions of the South Los Angeles CPIO District as indicated by a plan stamped by the Department of City Planning.

(b) **Non-Appealable Ministerial Approval.** The approval of an Administrative Clearance is not subject to appeal and is not discretionary for purposes of CEQA Guidelines Sections 15060(c)(1) and 15268.

(c) **Scope of Review and Non-Conforming Uses.**

(i) In reviewing a Project for an Administrative Clearance, the Director shall review the Project for compliance with those regulations that are applicable to the proposed scope of construction or use. For example, a Project that involves only façade improvements shall comply with applicable façade standards, but need not comply with parking lot standards.

(ii) Non-conforming uses shall comply with LAMC Section 12.23, except as noted in Section IV.B.1 of this ordinance.

3. **CPIO Adjustments**. In addition to the requirements in LAMC Section 13.14.G.3, the following shall apply:

(a) **Findings.** In addition to the required findings in LAMC Section 13.14.G.3(b), the Director, or the Area Planning Commission on appeal, shall find that the Project substantially complies with the Design Guidelines in Appendix B of the South Los Angeles Community Plan or any applicable citywide design guidelines.

(b) **Eligible Regulations.** Unless expressly stated otherwise in this South Los Angeles CPIO District, all development regulations are eligible for a CPIO Adjustment pursuant to this Section I-6.C.3. Projects seeking relief from a Subarea regulation that is not eligible (or further eligible) for a CPIO Adjustment may seek relief with a CPIO Exception.

(c) **CEQA.** Approval of a CPIO Adjustment is a discretionary approval for purposes of CEQA Guidelines Section 15060(c)(1).

4. **CPIO Exceptions.** In addition to the requirements in LAMC Section 13.14.G.4, the following shall apply:

(a) **Findings.** In addition to the required findings in LAMC Section 13.14.G.4(b), the Area Planning Commission, or the City Council on appeal, shall find that the Project substantially complies with the Design Guidelines attached as Appendix B to the South Los Angeles Community Plan or any applicable citywide design guidelines.

(b) **CEQA.** Approval of a CPIO Exception is a discretionary approval for purposes of CEQA Guidelines Section 15060(c)(1).

(c) **Supplemental Development Regulations.** All Projects shall comply with all applicable supplemental development regulations in the applicable CPIO Subarea, unless a CPIO Adjustment or CPIO Exception is permitted and obtained or the Project falls within the category of Projects described in Section I-5.F of this CPIO District. Images and figures provided in the CPIO District are illustrative only and are not intended to establish supplemental development regulations.

(d) **South Los Angeles Community Plan Footnote 1.** Projects located in whole or in part in TOD Subarea G seeking entitlements under South Los Angeles Community Plan Footnote 1 shall require an Exception when in conflict with the South Los Angeles CPIO maximum permitted FAR or Height and shall also conform to the South Los Angeles CPIO's Development Standards.

5. **Eligible Historic Resource Evaluation.** Prior to any other CPIO Approval being issued, a Project that involves an Eligible Historic Resource shall comply with the following review procedures:

(a) **Non-Demolitions.** For any Project that does not involve the demolition of an Eligible Historic Resource, no CPIO Approval shall be issued until one of the following occurs:

(i) The Director, in consultation with the Office of Historic Resources, determines, based upon substantial evidence, that the Eligible Historic Resource is not an historical resource, as defined by Public Resources Code Section 21084.1;

(ii) The Director, in consultation with the Office of Historic Resources, determines, based upon substantial evidence, that the Project is consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or,

(iii) Environmental review in compliance with CEQA was completed for the Project, including if necessary, the adoption of a statement of overriding considerations.

(b) **Demolitions.** For any Project that involves the demolition of an Eligible Historic Resource, no CPIO Approval shall be issued until one of the following occurs:

(i) The Director, in consultation with the Office of Historic Resources, determines, based upon substantial evidence, that the Eligible Historic Resource is not an historical resource, as defined by Public Resources Code Section 21084.1; or

(ii) Environmental review in compliance with CEQA was completed on the Project, including if necessary, the adoption of a statement of overriding considerations.

(c) **CEQA Review for Eligible Historic Resources.** In complying with this Section I-6.C.5, if at any time the Director, in consultation with the Office of Historic Resources, determines the Eligible Historic Resource is not a historical resource as defined by Public Resources Code Section 21084.1, approval of the Project through an Administrative Clearance involving no other discretionary approvals shall be a ministerial approval for purposes of CEQA, including CEQA Guidelines, Section 15268. If the Director, in consultation with the Office of Historical Resources, determines the Eligible Historic Resource is a historical resource as defined by Public Resource Code Section 21084.1, approval of the Project through an Administrative Clearance shall be a discretionary approval for purposes of CEQA Guidelines, Section 15060(c)(1). In reviewing and approving a Project with a historical resource, the Director and Office of Historic Resources shall take such steps within the scope of their powers and duties as they determine are necessary for the preservation of the historical resource, including but not limited to, consulting with the applicant to provide voluntary options for preservation or initiating a formal designation process.

(d) **Appeals.** No determination of the Director in this Section I-6.C.5 is independently appealable unless an appeal of an entitlement or CEQA action is otherwise available through this CPIO District, the LAMC, or CEQA.

## Section I-7. RIGHT-OF-WAY IMPROVEMENTS AND STREETSCAPE PLANS

**A.** **Streetscape Requirements**. When right-of-way improvements are required of any Project, pursuant to LAMC Section 12.37, Articles 2 or 7 of LAMC Chapter 1, or other City ordinance, and the right-of-way is subject to a streetscape plan, the improvements shall be consistent with the streetscape plan unless the LADOT General Manager or the City Engineer finds either of the following:

1. Consistency with the streetscape plan is not feasible or practical;

2. The cost of making the improvement consistent with the streetscape plan disproportionately exceeds the cost to other property owners who are required to make improvements consistent with the streetscape plan.

**B.** **Non-Conforming Improvements**. Notwithstanding anything to the contrary in LAMC Section 12.37.A.3 or another adopted City ordinance, improvement requirements shall not be waived or excused for a Project on the basis that the existing improvements currently meet existing City standards and requirements, unless the improvement also conforms to any streetscape plan for the right-of-way. If existing improvements do not conform to the streetscape plan, they will need to be improved to meet the streetscape plan standards unless the City Engineer or LADOT General Manager make the findings in Subsection A, above, or the improvement requirement is otherwise successfully appealed under Subsection E, below.



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**C.** **Streetscape Plan.** For purposes of this Section, "streetscape plan" shall refer to a plan that was approved by the Board of Public Works or the City Planning Commission, or both, or the City Council, and the plan is consistent with the Community Plan, the Circulation Element of the General Plan, and the Transportation Demand Management and Trip Reduction Measures of LAMC Section 12.26.J (as determined by LADOT), and is necessary or desirable to improve the aesthetic character of the street and encourage the use of transit and active transportation.

**D.** **Consistency Determination.** Consistency with the streetscape plan shall be determined by the LADOT General Manager, after consultation with the Director and the City Engineer.

**E.** **Appeal.** An applicant may appeal any streetscape improvement requirement in Subsection A and B, including the findings under Subsections A.1 or A.2., through any appeal process that is available for the imposition of the underlying right-of-way improvement requirement. For example, if the underlying improvement is being imposed under LAMC Section 12.37, the requirement to improve the right-of-way consistent with the streetscape plan may be appealed under LAMC Section 12.37.I. If the underlying improvement is being imposed under LAMC Section 17.08 on a parcel map, the requirement to improve the right-of-way consistent with the streetscape plan may be appealed under LAMC Section 17.54.

**F.** **Subsequent Ordinance.** If the City Council later adopts an ordinance to regulate streetscape plan improvements and the ordinance is applicable to the CPIO District, this Section I-7 shall be of no further force and effect.

## Section I-8. ENVIRONMENTAL STANDARDS PROCEDURES

The Environmental Standards in Appendix A are included in the South Los Angeles CPIO District to implement the Mitigation & Monitoring Program included as part of the South Los Angeles and Southeast Los Angeles Community Plans update and reviewed in the City of Los Angeles South Los Angeles and Southeast Los Angeles Community Plans Environmental Impact Report (Case No. ENV-2008-1781-EIR), certified on November 22, 2017.

An applicant seeking a CPIO Approval shall comply with all applicable Environmental Standards as set forth in Appendix A, subject to the following rules.

**A.** **Applicability of Environmental Standards.** A Project does not need to comply with any Environmental Standard that is not relevant to the scope of activities involved with the Project. For example, a Project that proposes only minor façade alterations and no grading, shall not be subject to Environmental Standards that apply to grading activities (such as noise and vibration standards). The Director, in his or her reasonable discretion, shall determine those Environmental Standards that apply to a particular Project.

**B.** **Plans.** Compliance with all applicable Environmental Standards listed in Appendix A shall be demonstrated on the plans as project features (that is, features that are physically built into the Project such as an air filtration system) or as operational features listed on a sheet within the plans (that is, features that are carried out either during the construction of the Project, or over the life of the project, such as the use of paints, sealants, and other building materials that yield low air pollutants).

**C.** **CPIO Approvals.** No CPIO Approval shall be issued until an applicant has demonstrated substantial compliance with all applicable Environmental Standards or modified Environmental Standards approved pursuant to Subsection D, below. Determination of substantial compliance shall be at the discretion of the Director.

**D.** **Modification of Environmental Standards**. Modifications of Environmental Standards do not require the processing of a CPIO Adjustment or CPIO Exception. The Director (or appeal body on appeal) may modify or not require an Environmental Standard listed in Appendix A for any Project when: (1) the Director finds in writing, based upon substantial evidence, the Environmental Standard is not necessary to mitigate an impact, including because of the existence of a similar or more effective regulation that applies to the Project; (2) the City complies with CEQA Guidelines, Section 15162, including by preparing an addendum or subsequent environmental clearance to the South Los Angeles and South Los Angeles Community Plans EIR to analyze the impacts from the modifications to the Environmental Standards; or (3) the City prepares a new CEQA clearance for the Project. No CPIO Approval shall be issued for a Project with a modified Environmental Standard until this subsection has been complied with. The modification of an Environmental Standard is not independently appealable unless an appeal of an entitlement or CEQA determination is otherwise available through this CPIO District, the LAMC, or CEQA.

## Section I-9. USE OF DESIGN GUIDELINES

The Design Guidelines in Appendix B of the South Los Angeles Community Plan and any other applicable citywide design guidelines are not mandatory or required for an Administrative Clearance. The guidelines should be used by decision makers in the review and approval of discretionary zoning approvals within the CPIO District boundaries that require findings related to neighborhood compatibility, the degradation or benefit of the Project to surrounding properties and the community, and conformity with the intent and purpose of the Community Plan. Such zoning approvals include, but are not limited to, CPIO Adjustments, CPIO Exceptions, and conditional use permits under LAMC Section 12.24.

Nothing in this Section, the South Los Angeles CPIO District, or any other applicable citywide design guidelines, shall allow decision makers to approve, deny, or condition a discretionary approval based on guidelines related to signs. Any design guidelines related to signs in Appendix B of the South Los Angeles Community Plan or any other Citywide Design Guidelines are for guidance only.

## Section I-10. CEQA CLEARANCE

For purposes of CEQA compliance for subsequent projects approved with a CPIO Approval, Including, but not limited to, consideration of a CEQA clearance pursuant to Government Code Section 65457, Public Resources Code Section 21155.4; or CEQA Guidelines, Sections 15183 or 15183.3, the South Los Angeles CPIO District shall operate and be treated as a specific plan, zoning ordinance, and a prior plan level decision for which and EIR was certified.

## Section I-11. SEVERABILITY

If any portion, subsection, sentence, clause or phrase of this ordinance is for any reason held by a court of competent jurisdiction to be invalid, such a decision shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have passed this ordinance and each

portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.



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# CHAPTER III – TOD SUBAREAS

## TRANSIT-ORIENTED DEVELOPMENT ("TOD") SUBAREAS

E – TOD Low
F – TOD Medium
G – TOD High
H – TOD Regional

## OVERVIEW

TOD Subareas E, F, G, and H promote walkable, vibrant, attractive and complete transit centers that provide a greater mix of housing for a range of incomes, jobs, goods and services, and that enhance community identity as described in Sections I-2 and consistent with the purposes set forth in Section I-3.

The intent of the supplemental development regulations in this Chapter is to provide for well-designed, pedestrian-oriented projects that are appropriate to the scale and context of each specific transit neighborhood. Use regulations promote the establishment of much needed uses (such as Full-Service Grocery Stores and Banks), as well as incentivize 100 percent affordable housing and mixed-income housing projects to be built near transit. All Projects within a TOD Subarea (see Figure III-1, III-2, and III-3) shall comply with the applicable supplemental development regulations in this Chapter III.



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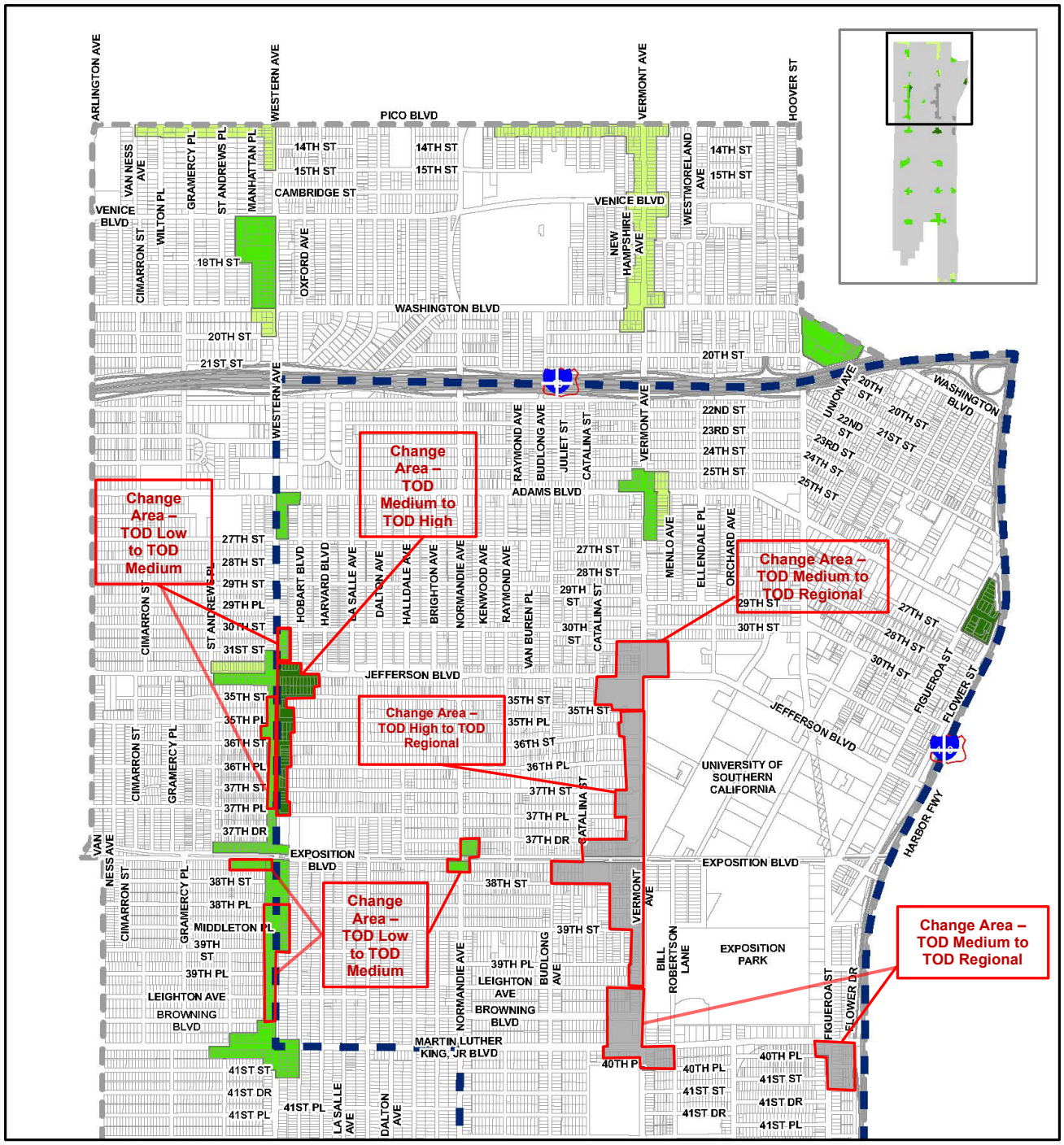



**Figure III-1, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

Chapter 3 - TOD SUBAREAS

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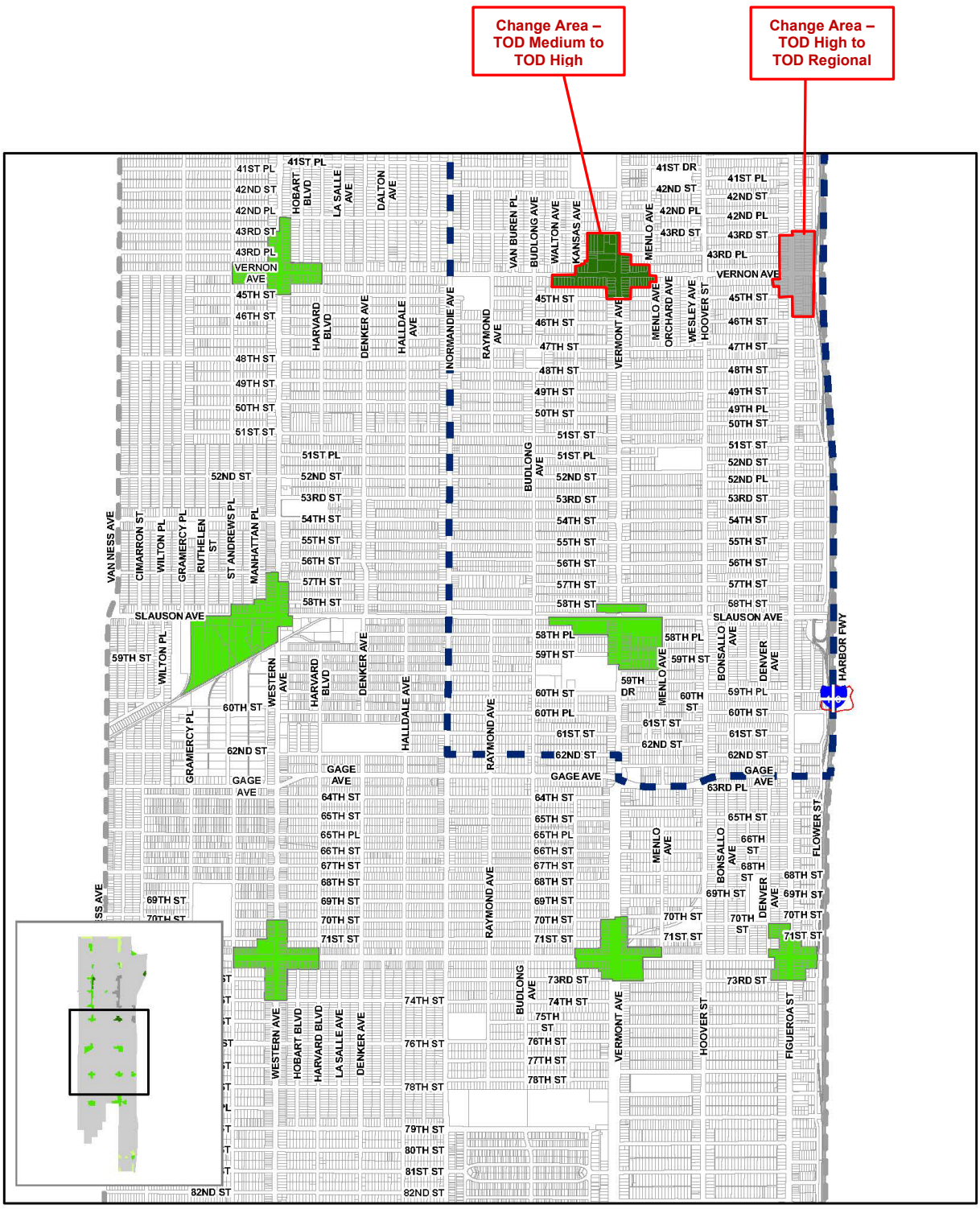



**Figure III-2, TOD Subareas**

Chapter 3 - TOD SUBAREAS



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**Figure III-3, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

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Chapter 3 - TOD SUBAREAS

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## Section III-1. APPLICABILITY

**A. Purpose.** The purposes of this section are (1) to encourage the construction of 100 percent affordable housing projects and mixed-income housing projects by providing specific density, FAR and height bonuses and streamlined procedures to approve said projects; (2) to foster project designs that are pedestrian oriented; and (3) to improve the quality of new development as well as its compatibility with existing neighborhoods through the implementation of supplemental development regulations. By providing bonuses and streamlined procedures for specified affordable housing projects the section intends to provide additional tools to promote affordable housing while not undermining the implementation of the state density bonus law codified in Government Code Sections 65915-65918 and LAMC Section 12.22.A.25.

**B. Density, Height, and FAR Bonuses.** Projects that obtain density, height or FAR bonuses, incentives, waivers or concessions pursuant to LAMC Sections 12.22.A.25, 12.22.A.31 or any other State or local program, including Government Code Sections 65915-65918, may not use any CPIO Bonus or incentive unless otherwise expressly provided in this South Los Angeles CPIO District.

**C. TOC Projects or Density Bonus Projects.**

1. **Base**. The Base density, Base height and Base FAR for TOC Projects or Density Bonus Projects are set forth in Section III-3 and Table III-2.

2. **CPIO Bonuses.** Unless expressly provided otherwise in this CPIO District, no CPIO Bonuses are available for TOC Projects or Density Bonus Projects.

**D. CPIO Affordable Housing Projects.**

1. **Base.** The applicable Base density, Base height and Base FAR for all CPIO Affordable Housing Projects are as set forth in Section III-3 and Table III-2.

2. **Bonuses.** CPIO Affordable Housing Projects may utilize CPIO Bonuses as provided in Section III-3 and Table III-2.

3. **Additional Incentives.** If eligible for CPIO Bonuses, then, in addition to the CPIO Bonuses above, a CPIO Affordable Housing Project may utilize up to two additional incentives from the menu of options listed below, provided that the landscaping for the Project is sufficient to qualify for the number of landscape points equivalent to 10 percent or more than otherwise required by LAMC Section 12.40 and Landscape Ordinance Guidelines "0":

   (a) **Yard/Setback.** Up to 20 percent decrease in the required width or depth of any individual yard or setback except along any property line that abuts a R1 or more restrictively zoned property.

   (b) **Lot Coverage.** Up to 20 percent increase in lot coverage limits.



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(c) **Lot Width.** Up to 20 percent decrease from a lot width requirement.

(d) **Open Space.** Up to 20 percent decrease from an open space requirement.

4. **Administrative Clearance.** CPIO Affordable Housing Projects that utilize CPIO Bonuses and incentives in Subsections 2 and 3, above, and that comply with all other requirements of the CPIO, shall be approved with an Administrative Clearance pursuant to Section I-6.C.2 of this ordinance.

5. **Replacement Housing.** Projects that qualify as a CPIO Affordable Housing Project must meet any applicable housing replacement requirements of Government Code Section 65915(c)(3) (as it may be amended from time to time), subject to verification by LAHD prior to the issuance of any building permit. Replacement housing units required per this subsection may also count towards any required Restricted Affordable Units.

6. **Affordability Covenants.** Prior to issuance of an Administrative Clearance for a CPIO Affordable Housing Project, the following shall apply:

(a) For Projects that provide Lower, Very Low and Extremely Low Income Housing, a covenant shall be recorded in a form and manner approved by LAHD, guaranteeing that the affordability criteria will be observed for at least 55 years from the issuance of the certificate of occupancy or for a longer period of time if required by the construction or mortgage financing assistance program, mortgage assistance program, or rental subsidy program, or any other government requirement.

(b) Any covenant described in this paragraph must provide for a private right of enforcement by the City, any tenant, or owner of any building to which a covenant and agreement applies.

7. **Targeted Commercial Use Covenants.** Prior to issuance of an Administrative Clearance for a CPIO Affordable Housing Project that includes a Targeted Commercial Use, the following shall apply:

(a) A covenant acceptable to the City Administrative Officer and the Department of City Planning shall be recorded guaranteeing that the subject Targeted Commercial Use, or another Targeted Commercial Use, or combination of Targeted Commercial Uses, applicable to the subarea and with the commensurate Bonus increase, will remain for at least 30 years from the issuance of the certificate of occupancy.

(b) If the duration of the covenants provided for in Section III-1.D.7(a) directly above conflicts with the duration for any other government requirement, the longest duration shall control.

(c) Any covenant described in this paragraph must provide for a private right of enforcement by the City, any tenant, or owner of any building to which a covenant and agreement applies.

(d) Any covenant shall be prepared and recorded in a form and manner approved by the Department of City Planning to ensure that the obligations are binding against all successors in interest to the real property.

8. **Unit Quality.** Affordable dwelling units within CPIO Mixed-Income Housing Projects shall be no less than 90 percent of the average square footage of market-rate dwelling units with the same number of bedrooms, be interspersed throughout the development, and shall have access to the same amenities and use of the same entrances. Building materials shall be consistent throughout.

**E. 100 percent Commercial Projects.** Projects with new construction that include no residential uses shall comply with the following:

1. **Base.** The Base height, including the minimum height, and Base FAR for 100 percent Commercial Projects are set forth in Section III-3 and Table III-3.

2. **Bonuses.** One hundred (100) percent Commercial Projects that include Targeted Commercial Uses may use CPIO Bonuses for height and FAR as provided in Sections III-3.A.2 and III-3.B.2 and in Table III-3.

3. **Administrative Clearance.** One hundred (100) percent Commercial Projects that comply with all applicable supplemental development regulations, and that comply with all other requirements of the CPIO, shall be approved with an Administrative Clearance pursuant to Section I-6.C.2.

4. **Targeted Commercial Use Covenants.** Prior to issuance of an Administrative Clearance for a 100 percent Commercial Project that includes a Targeted Commercial Use, the following shall apply:

(a) A covenant acceptable to the City Administrative Officer and the Department of City Planning shall be recorded guaranteeing that the subject Targeted Commercial Use, or another Targeted Commercial Use, or combination of Targeted Commercial Uses, applicable to the subarea and with the commensurate Bonus increase, will remain for at least 30 years from the issuance of the certificate of occupancy.

(b) If the duration of covenants provided for in Section III-1.E.4(a) directly above conflicts with the duration for any other government requirement, the longest duration shall control.

(c) Any covenant described in this paragraph must provide for a private right of enforcement by the City, any tenant, or owner of any building to which a covenant and agreement applies.

(d) Any covenant shall be prepared and recorded in a form and manner approved by the Department of City Planning to ensure that the obligations are binding against all successors in interest to the real property.

**Section III-2. LAND USE REGULATIONS**

**A. Use.** Any new use or change of use shall be subject to the use regulations set forth in Table III-1 below.

**B. Existing Uses.** Non-conforming uses, including uses made non-conforming by this CPIO, shall comply with LAMC Section 12.23.

# TABLE III-1:
# USE REGULATIONS

| **Subarea Types:** E: TOD Low, F: TOD Medium, G: TOD High, H: TOD Regional | | | |
|---|---|---|---|
| **Use** | Regulation | Applicable Subareas | Exemptions/Clarifications |
| **Alcohol Sales, Off-Site** | Not more than one establishment is permitted within a ½ mile (2,640 linear foot) radius of another Off-Site Alcohol Sales use.[1] | E, F, G, H | • Full-Service Grocery Store and Full-Service Drug Stores are exempt.<br>• Full-Service Grocery Stores and Full-Service Drug Stores that sell alcohol shall be included in the ½ mile radius calculation for other new Off-Site Alcohol Sales requests.<br>• This term is also expressed as Off-Site Alcohol Sales |
| **Auto-Related Uses** | Prohibited. | E, F, G, H | • Expansion, re-modeling, replacement of existing Auto-Related Uses, or new accessory uses are exempt from the prohibition provided the Project complies with all applicable development standards of this CPIO and the Project is allowed by the underlying zone.<br>• New Auto-Related Uses or accessory Auto-Related Uses are exempt from the prohibition when the new uses are combined within the same lot or parcel of an existing Auto-Related Use. |
| **Check Cashing Facilities** | Prohibited. | E, F, G, H | |
| **Drive-Through Establishments** | Prohibited. | E, F, G, H | |
| **Gun Shops** | Prohibited. | E, F, G, H | |
| **Motels** | Prohibited. | E, F, G, H | |
| **Pawn Shops** | Prohibited. | E, F, G, H | |
| **Payday Lenders** | Prohibited. | E, F, G, H | |



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| **Subarea Types:** E: TOD Low, F: TOD Medium, G: TOD High, H: TOD Regional | | | |
|---|---|---|---|
| **Use** | Regulation | Applicable Subareas | Exemptions/Clarifications |
| **Public Self Storage** | Prohibited. | E, F, G, H | |
| **Recycling Collection** | Prohibited. | E, F, G, H | |
| **100% Residential Uses** | Prohibited. | G, H | This prohibition includes live/work units. |
| **Smoke/Vapor Shops** | Not more than one establishment is permitted within a ½ mile (2,640 linear foot) radius of another Smoke/Vapor Shop use.[1] | E | |
| | Prohibited. | F,G, H | |
| **Swap Meets** | Prohibited. | E, F, G, H | |

[1] Distance shall be measured from the center point of the front lot line of the subject parcel to the nearest property line of any parcel containing the same use.



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## Section III-3. DEVELOPMENT STANDARDS

All Projects in the TOD Subareas are subject to the following development standards:

**A.** **Building Height.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following height regulations:

1. **Ground Floor Height.** The following height restrictions apply:

   (a) The Ground Floor shall have a minimum height of 14 feet, measured from the finished floor to the underside of the structural floor or roof above.

   (b) For Projects with an Active Floor Area, the Ground Floor shall have a minimum height of 11 feet, measured from the finished floor to the finished ceiling.

2. **Base Height.** The Base height, including any minimum height, shall be set forth in Table III-2 and Table III-3.

3. **Bonuses for Height.** The following Bonuses for height apply:

   (a) For a Density Bonus Project or a TOC Project, any incentive for height provided through the Density Bonus or TOC program shall be in addition to the Base height set forth in Table III-2.

   (b) For a CPIO Affordable Housing Project, the Base height and Bonus height are set forth in Table III-2.

   (c) For a 100 percent commercial project, the minimum height, Base height and the Bonus Height shall be as set forth in Table III-3, except as follows:

      (i) 100 percent commercial projects that include one or more Targeted Commercial Use(s) may exceed the Base height set forth in Table III-3 by one additional story (not to exceed 15 feet).

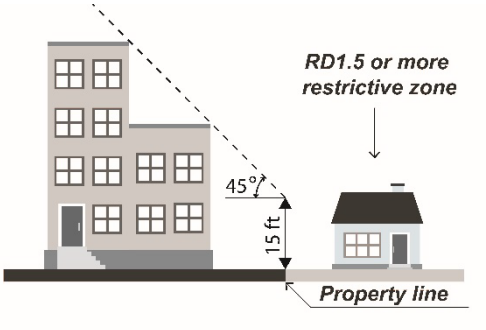
      (ii) Child care facility and Sit-Down Restaurant uses shall not be eligible for the additional story unless the proposed use exceeds 5,000 sq. feet**.**

4. **Transition to Residential.** The following height restrictions apply:



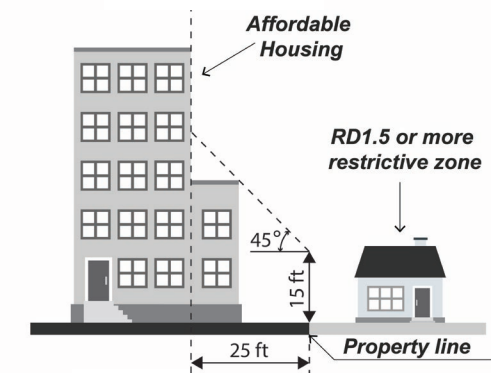
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(a) Where a parcel is either abutting or across an alley from a property in the RD1.5 or more restrictive zone, the building height shall be stepped-back within a 45 degree angle as measured 15 feet above grade at the property line of the lot in the more restrictive zone.



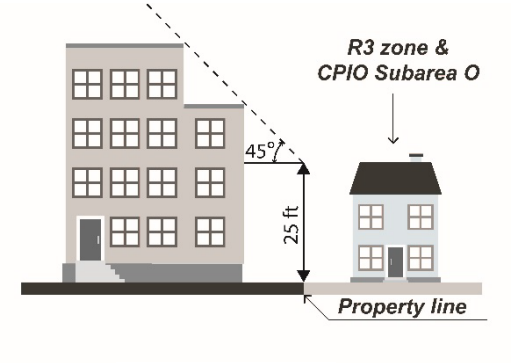

*Figures are not to scale, illustrative only and not regulatory.

(b) For all CPIO Affordable Housing Projects, Density Bonus Projects or TOC Projects, that are either abutting or across an alley from a property in the RD1.5 or more restrictive zone, the required height transition applies only to the first 25 feet of depth as measured from the property line of the lot in the more restrictive zone.




*Figures are not to scale, illustrative only and not regulatory.

(c) When a parcel is either abutting or across an alley from a property that is both in the R3 zone and is in Subarea O of the CPIO, the building height shall be stepped-back within a 45 degree angle as measured 25 feet above grade at the property line of the lot in the R3 zone.

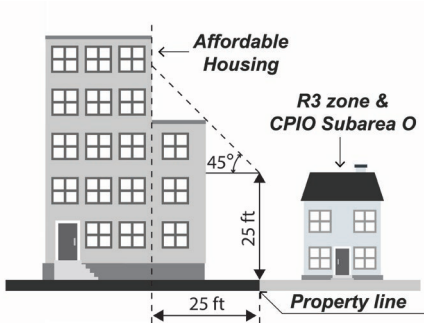



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(d) For all CPIO Affordable Housing Projects, Density Bonus Projects and TOC Projects, when on a parcel that is either abutting or across an alley from a property that is both in the R3 zone and is in Subarea O of the CPIO, the required height transition applies only to the first 25 feet of depth as measured from the property line of the lot in the more restrictive zone.



*Figures are not to scale, illustrative only and not regulatory.

5. **Architectural Features.** Architectural Features may exceed the allowable maximum height, including the maximum height granted through any CPIO Bonus or any bonus or incentive given under LAMC Section 12.22.A.25 or 12.22.A.31, by up to 20 percent.

6. **Rooftop Structures and Equipment.** Rooftop structures, equipment and improvements may exceed the maximum building height when authorized pursuant to LAMC Section 12.21.1.B.3 (a) provided the structure, equipment or improvement is screened from public view using non-reflective materials or otherwise made compatible with the overall design of the building.

7. **Subarea H (TOD Regional).** Projects that obtain a conditional use permit pursuant to LAMC Section 12.24 U.26 to request additional height in excess of the height regulations in this Section III-3 A shall not be required to obtain a CPIO Exception.

8. **Adjustments.** The height regulations in this Section III-3.A shall not be eligible for a CPIO Adjustment.

**B. Building Density & Floor Area Ratio (FAR).** In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following density and FAR regulations:

1. **Residential Density.** The Base residential density shall be as provided in Table III-2, and as modified below:

(a) For a Density Bonus Project or a TOC Project, the Base density shall be 1 unit per 800 square feet of lot area, except that a Density Bonus Project or TOC Project that meets or exceeds the affordability percentages of a CPIO Mixed-Income Housing Project, shall use a Base density of 1 unit per 400 square feet of lot area (1/400) in addition to any residential density incentive provided through the Density Bonus or TOC program.

(b) For a CPIO Affordable Housing Project, the Base density shall be increased from 1 unit per 800 square feet of lot area (1/800) to 1 unit per 300 square feet of lot area (1/300) as set forth in Table III-2.

(c) The density regulations in this Section III B.1 shall not be eligible for a CPIO Adjustment.

2. **Floor Area Ratio (FAR).** The maximum building FAR shall be as provided in Tables III-2, and III-3, and is subject to the following:

(a) For a Density Bonus Project or a TOC Project, any FAR increase provided through those programs shall be added to the Base FAR set forth in Table III-2.

(b) A CPIO Affordable Housing Project's Bonus FAR shall be as set forth in Table III-2, except as follows:

(i) Bonus FAR may be increased for CPIO Affordable Housing Projects that include a Targeted Commercial Use, or combination of Targeted Commercial Uses, a Unified Lot, a Publicly Accessible Open Space and/or a Public Plaza as provided below, but cannot exceed the Maximum Allowable Bonus FAR set forth in subdivision 2(d).

(ii) The Bonus FAR for Targeted Commercial Uses shall be up to 50 percent of the building floor area devoted to each Targeted Commercial Use.

(iii) Projects that result in or create a Unified Lot:

a. Projects that involve new construction and consolidate two lots to form a Unified Lot that is at least 10,000 square feet are allowed up to a 10 percent increase in FAR.

b. Projects that involve new construction and consolidate three or more lots to form a Unified Lot that is at least 15,000 square feet are allowed up to a 15 percent increase in FAR.

c. No Project can receive more than one FAR increase related to the creation of one or more Unified Lots.

d. The FAR increase provided for Unified Lots cannot exceed the Maximum Allowable Bonus FAR set forth below in subdivision 2 (d).

(iv) Projects that include Publicly Accessible Open Space that are:

a. At least 5,000 square feet but less than 10,000 square feet in size, 25 percent of the area devoted to Publicly Accessible Open Space shall be added to the Bonus FAR provided the Maximum Allowable Bonus FAR set forth below in subdivision 2(d) is not exceeded.

b. 10,000 square feet or more, 50 percent of the floor area devoted to Publicly Accessible Open Space shall be added to the Bonus FAR provided the Maximum Allowable Bonus FAR set forth below in subdivision 2 (d) is not exceeded.

c. No Project can receive more than one FAR increase related to the creation of a Publicly Accessible Open Space.

(c) For a 100 percent commercial project, the Base FAR and Bonus FAR are set forth in Table III-3.

(i) Bonus FAR is allowed for 100 percent commercial projects that include a Targeted Commercial Use, or combination of Targeted Commercial Uses, a Unified Lot, a Publicly Accessible Open Space and/or a Public Plaza as provided below, but cannot exceed the Maximum Allowable Bonus FAR set forth in subdivision 2(d).

(ii) The Bonus FAR for Targeted Commercial Uses shall be up to 50 percent of the building floor area devoted to each Targeted Commercial Use.

(iii) Projects that result in or create a Unified Lot:

a. Projects that involve new construction and that consolidate two lots to form a Unified Lot that is at least 10,000 square feet, are allowed up to a 10 percent increase in FAR.

b. Projects that involve new construction that consolidate three lots or more to form a Unified Lot that is at least 15,000 square feet, are allowed up to a 15 percent increase in FAR.

c. No Project can receive more than one FAR increase related to the creation of one or more Unified Lots.

d. The FAR increase provided for Unified Lots cannot exceed the Maximum Allowable Bonus FAR set forth below in subdivision 2 (d).

(iv) Projects that include Publicly Accessible Open Space:



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a. If the Publicly Accessible Open Space is aat least 5,000 sq. ft. but less than 10,000 square feet in size, 25 percent of the floor area devoted to Publicly Accessible Open Space shall be added to the Base FAR but cannot exceed the Maximum Allowable Bonus FAR set forth below in Subdivision 2(d) below.

b. If the Publicly Accessible Open Space is 10,000 square feet or more, 50 percent of the floor area devoted to Publicly Accessible Open Space shall be added to the Base FAR but cannot exceed the Maximum Allowable Bonus FAR set forth below in Subdivision 2(d) below.

c. No Project can receive more than one FAR increase related to the creation of a Publicly Accessible Open Space.

(v) If a Public Plaza is included, an additional 0.5 Bonus FAR may be obtained. For example, a project with a FAR of 1.5:1 that includes a Public Plaza may increase its FAR to 2.0:1.

(d) Maximum Allowable Bonus FAR. For all Projects except Density Bonus Projects and TOC Projects, the total combined floor area provided under this CPIO shall not exceed the following Maximum Allowable Bonus FAR, inclusive of all incentives and bonuses, as follows:

(i) Projects in Subarea E (TOD Low) shall be limited to 3:1;

(ii) Projects in Subarea F (TOD Medium) shall be limited to 3.5:1;

(iii) Projects in Subarea G (TOD High) shall be limited to 4:1; and

(iv) Projects in Subarea H (TOD Regional) shall be limited to 6:1.

(e) **Adjustments.** The FAR regulations in this Section III B.2 shall not be eligible for a CPIO Adjustment.



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**TABLE III-2**
**DENSITY, FAR, & HEIGHT**
**FOR ALL PROJECTS THAT INLCUDE RESIDENTIAL**

| | ALL PROJECTS - BASE (including Density Bonus and TOC) | | | | CPIO AFFORDABLE HOUSING PROJECTS BONUS | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Subarea** | **Base Density**[1] | Minimum Height | Base Height | Base FAR | Bonus Density | Bonus Height[2] | Bonus FAR[3] | Maximum Allowable FAR[3] | Clarifications |
| E (TOD Low) | 1/800 | N/A | 3 Stories/ 45 Feet | 1.5:1 | 1/300 | 4 Stories/ 60 Feet | 2:1 | up to 3:1 | •Maximum 2:1 FAR shall be reserved for CPIO Mixed-Income Housing Projects.<br>•Up to 3:1 FAR for CPIO Mixed-Income Housing Projects that include TCU, UL and/or PAOS (inclusive of all bonuses and incentives). |
| | | | | | | | 3:1 | 3:1 | •Maximum 3:1 FAR shall be reserved for CPIO 100% Affordable Housing Projects. |
| F (TOD Medium) | 1/800 | 2 Stories | 4 Stories/ 60 Feet | 1.5:1 | 1/300 | 5 Stories/ 75 feet | 3:1 | Up to 3.5:1 | • Up to 3.5:1 FAR for CPIO Affordable Housing Projects that include a TCU, UL and/or PAOS (inclusive of all bonuses and incentives). |
| G (TOD High)[1] | 1/800 | 2 Stories | 7 Stories/ 105 feet | 1.5:1 | 1/300 | 8 Stories/ 120 feet | 3.5:1 | up to 4:1 | • Up to 4.1 FAR for CPIO Affordable housing Project that includes a TCU, UL and/or PAOS (inclusive of all bonuses and incentives). |
| H (TOD Regional Center) | 1/800 | 2 Stories | 12 Stories/ 180 feet | 2.25:1 | No Limit | 15 Stories/ 225 feet | 6:1 | up to 6:1 | •Projects, may apply for a CUP pursuant to LAMC Sec. 12.24F. to request additional height.<br><br>•Up to 6:1 FAR for CPIO 100 Percent Affordable Housing Projects.<br><br>•Up to 6:1 FAR for CPIO Mixed- Income Affordable Housing Projects, that include a TCU, UL and/or PAOS (inclusive of all bonuses and incentives), otherwise up to 5.5 Bonus FAR.<br><br>• Replacement units for CPIO Affordable Housing Projects within the boundaries of the CPIO Protected Unit Area (south of 30th Street, west of Hoover Street to Exposition Blvd, and north of 48th Street) shall not count towards any required Restricted Affordable Units and at least 30% of all units in developments larger than 5 units must have 2 or more bedrooms.<br><br>• Except for Supportive Housing, Transitional Housing, senior housing projects, housing for persons with disabilities, at least 30% of all units in CPIO Affordable Housing Projects in the CPIO Protected Unit Area larger than 5 units shall have 2 or more bedrooms.<br><br>• CPIO Affordable Housing Projects that result in the demolition of any units subject to any form of rent control, replacement units for CPIO Affordable Housing Projects in the CPIO Protected Unit Area shall not count towards any required Restricted Affordable Units. |

[1] Base Density for Density Bouns and TOC Projects that meet certain requirements 1/400; see Section III-3 B.1.(a).

[2] Targeted Commercial Uses see Section III-3 A.3 for bonus height.

[3] Targeted Commercial Use(s) (TCU), Unified Lot (UL) and/or Publicly Accessible Open Space (PAOS); see Section III-3 B.2 for bonus FAR.



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**TABLE III-3**
**FAR AND HEIGHT for 100% COMMERCIAL PROJECTS**

| Subarea | Minimum Height | Base Height | Bonus Height[1] | Base FAR | Bonus FAR[2] | Clarifications |
|---|---|---|---|---|---|---|
| E (TOD Low) | N/A | 3 Stories/ 45 Feet | 4 Stories/ 60 feet | 1.5:1 | 3:1 | •Projects that incorporate select Targeted Commercial Use(s) qualify for 4 story Bonus height[1]<br>•Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to 3:1 Bonus FAR. |
| F (TOD Medium) | 2 Stories | 4 Stories / 60 Feet | 5 Stories/ 75 feet | 1.5:1 | up to 3.5:1 | • Full-Service Gorcery Store uses shall be exempt from the 2 story minimum height regulation.<br>• Projects that incorporate select Targeted Commercial Uses qualify for 5 story Bonus height[1]<br>•Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to 3.5:1 Bonus FAR. |
| G (TOD High) | 2 Stories | 7 Stories / 105 feet | N/A | 1.5:1 | 2.25:1 | • Professional Office and/or Research and Development Projects (where such uses shall comprise a minimum of 30 percent of the total square footage of the building) qualify for 2.25:1 Bonus FAR |
| | | | 8 Stories / 120 feet | | 4:1 | •Projects that involve hotel uses qualify for 4:1 Bonus FAR and 8 story Bonus height.Does not apply to properties fronting Western Ave. between Jefferson Blvd. and Exposition Blvd; and properties at the intersection of Vermont Ave. and Vernon Ave. |
| | | | 8 Stories / 120 feet | | up to 4:1 | • Projects that incorporate select Targeted Commercial Uses qualify for 8 story Bonus height. 1<br>• Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to 4:1 Bonus FAR. |
| H (TOD Regional Center) | 2 Stories | 12 Stories / 180 feet | 13 Stories / 195 feet | 3:1 | up to ~~6:1~~ 4:1 | • Projects that incorporate a Targeted Commercial Use(s), UL, PAOS and/or PP qualify for up to ~~6:1~~ 4:1 Bonus FAR and one additional story. |
| | | | ~~15 Stories / 225 feet~~ | | ~~4:1~~ | • Projects that incorporate hotel, Professional Office, Research and Development and/or Major Retailer uses (and such use shall comprise a minimum of 30 percent of the total square footage of the building) qualify for 4:1 Bonus FAR and ~~15~~ 13 story Bonus height. [1] |

[1] Targeted Commercial Uses see Section III-3 A 3 for bonus height
[2] Targeted Commercial Use(s) (TCU), Unified Lot (UL), Publicly Accesible Open Space (PAOS) and/or a Public Plaza (PP), see Section III-3 B.2 for bonus FAR

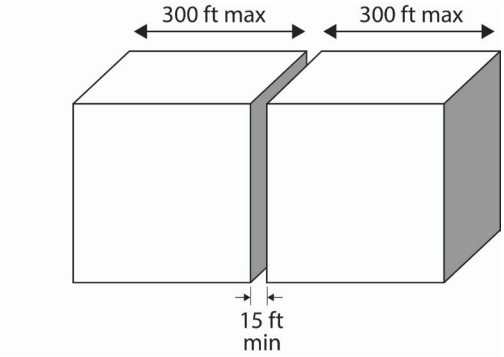


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**C. Building Disposition.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following disposition regulations:

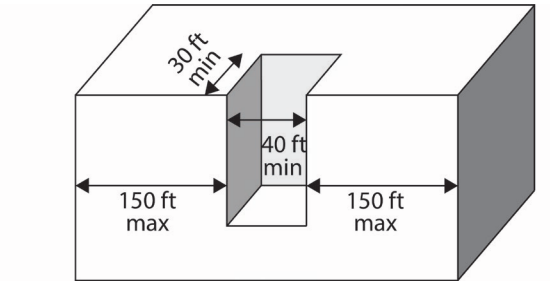
1. **Street Wall.** Any street facing façade of a Project where the cumulative total is greater than 300 feet in length shall comply with either subsection (a) or (b) below:

   (a) Design the Project as separate buildings, with each not to exceed a maximum of 300 feet in length, separated by passageways that are open to the sky from sidewalk grade and are at least a minimum of 15 feet wide (separate buildings may be built upon the same subterranean parking structure); or




*Figures are not to scale, illustrative only and not regulatory.

   (b) Provide a continuous building base of 1 to 3 stories with upper floor volumes that do not exceed a maximum of 150 feet in length and separated by courtyards open to the sky that are a minimum of 40 feet wide and a minimum of 30 feet in depth, as measured from the street facing façade.




*Figures are not to scale, illustrative only and not regulatory.

2. **Primary Frontage.**

   (a) For all Projects, the Ground Floor shall be located along the Primary Lot Line for at least 75 percent of the length of the Primary Frontage, up to a minimum height of 12 feet as measured from the abutting sidewalk grade or right of way.

   (b) The Ground Floor may be set back up to 20 feet along the Primary Frontage to the extent necessary to accommodate Pedestrian Amenities.

3. **Lot Coverage.** Projects shall provide a minimum lot coverage of 30 percent. Lot coverage shall be the cumulative total of the Building Footprint of all buildings on the lot including existing buildings to remain on the Project site and new buildings.



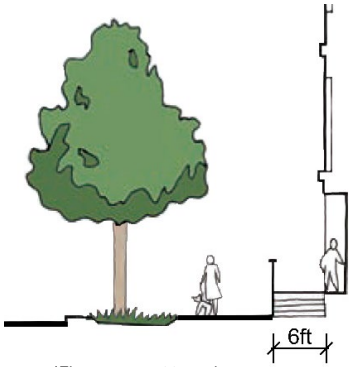
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4. **Landscape Buffer.** A 5-foot landscape buffer, inclusive of all required setbacks, shall be provided between the Project site and any abutting lot zoned RD1.5 or more restrictive. Landscaping that is drought tolerant, evergreen, and capable of growing to a height of 10 feet shall be utilized, and a decorative masonry wall a minimum of six and a maximum of eight feet in height shall be constructed along the shared property line.

5. **Residential Setbacks**

(a) A Project that consists exclusively of residential dwelling units with no Active Floor Area, where permitted, shall be set back at least six feet and not more than ten feet from the property line. This setback area shall be improved with landscaping, Pedestrian Amenities or a combination thereof.

(b) For Mixed-Use Projects, no setback requirements shall apply to any portion of a street facing building frontage used for residential uses.



*Figures are not to scale, illustrative only and not regulatory.

(c) Projects that involve the construction of new one and two family dwellings, including small lot subdivisions authorized by LAMC Section 12.22.C.27, shall have zero side-yard setbacks with abutting or shared common walls, as permitted by the Building Code.

**D. Building Design.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following building design regulations:

1. **Glazing.** Clear transparent glazing (e.g., windows or doors), shall occupy a minimum of 50 percent of Primary Frontage of the Ground Floor. For all other building façades facing public streets, clear transparent glazing shall occupy a minimum of 15 percent inclusive of all floors except the Primary Frontage of the Ground Floor.

2. **Articulation.** All exterior building walls shall provide a break in the plane, or a change in material, at least every 20 feet in horizontal length and every 15 feet in vertical length, created by an articulation or architectural detail, such as:

(a) Ground Floor storefront bays;

(b) A change in plane of at least 18 inches;

(c) Windows that are recessed at least 2 inches, or that project such as bays;

(d) Building overhangs, such as canopies or eaves;

(e) Terraces, balconies, porches or cantilevered designs;

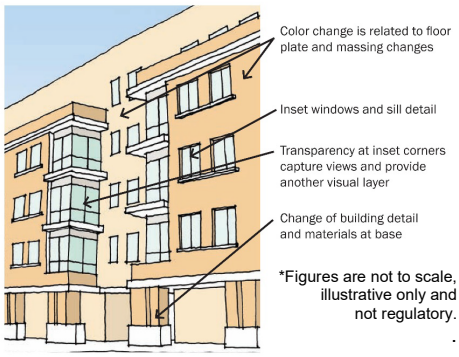
(f) Wood accents and wood trim for windows and doors;

(g) Varying roof forms and heights; and



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(h) Other Architectural Features or building materials that create a visual break (e.g. stucco reveals that are a minimum of 2 inches in depth).




3. **Projects Near Freeways.** For Projects that are within 100 feet of a freeway right-of-way, the following shall apply:

(a) Balconies are not permitted on any portion of a building that is within 100 feet of a freeway right-of-way.

(b) Projects that abut a freeway right-of-way shall provide a minimum 5-foot landscaped setback from the freeway right-of-way property line. Landscaping that is drought tolerant, evergreen, and capable of growing to a height of 10 feet shall be utilized. A decorative masonry wall a minimum of six feet and a maximum of eight feet in height shall be constructed along the property line.

4. **Active Floor Area.** For all Projects, the Ground Floor of the Primary Frontage shall incorporate Active Floor Area or Pedestrian Amenities along at least 75 percent of the Primary Frontage to a depth of at least 25 feet excluding areas required to be used for vehicular access.

5. **Street-Oriented Entrance.**

(a) Projects shall provide a Street-Oriented Entrance. Street-Oriented Entrances need not be parallel to the Primary Lot Line, provided that they are no more than 20 feet from the Primary Lot Line and augmented by entrance forecourts or other design features that establish a visual connection to the Primary Lot Line.

(b) For non-residential Projects, Street-Oriented Entrances shall be accessible during business hours and shall be no more than three feet above or below the sidewalk grade.

6. **Building Materials**.



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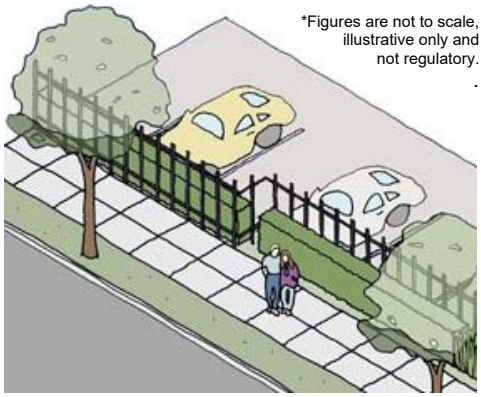
(a) Projects shall utilize two or more high-quality building materials and treatments on building exteriors such as brushed aluminum, brick, finished wood, or “Santa Barbara” smooth finish stucco.

(b) The following materials and treatments are prohibited: Styrofoam plant-ons and rough texture stucco (Examples lace, heavy dash, tunnel dash, heavy sand float).

(c) The Primary Frontage may be comprised of no more than 80 percent stucco.

**E. Parking Design.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following parking design regulations:

1. **Parking Lot Location.** Surface parking areas shall not be located between the Property Lot Line and the Primary Frontage of a building. Surface parking shall be located at the rear or side of buildings. Parking can also be enclosed within a structure, or located entirely below grade. Below grade structures may occupy the entire footprint of a lot.




2. **Surface Parking Screening.** Where permitted, surface parking lots that abut public sidewalks shall provide a three-foot wide landscaped buffer, and a three and a half foot high decorative wall and/or hedge along the property line facing a street intended to screen headlights. The wall and/or hedge shall provide pedestrian entrances (separate from vehicular entrances) from the public sidewalk.

3. **Ground Floor Parking Level.** Wherever at-grade or above ground parking is to be provided within a building’s Ground Floor level fronting a public street (excluding alleys), the entire building shall be set back six feet from the adjacent public street and the setback shall be improved with diverse landscaping that is comprised of two or more plant types that, at maturity, screens the Ground Floor parking area up to a height of 10 feet. This requirement does not apply to that portion of the building where internal parking structures are buffered by habitable floor area on the Ground Floor such as retail space or a community room.

4. **Parking Structure Façades.** For stand-alone parking structures, provide an external skin or other material consistent with or complementary to the overall design of the building intended to improve the building’s appearance over the basic concrete structure of ramps, walls and columns on all visible façades.



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Examples of appropriate skin material include heavy-gauge metal screen, pre-cast concrete panels, laminated glass, and photovoltaic panels.

5. **Shade Trees.** Surface parking lots shall have at least one tree for every four uncovered parking spaces distributed throughout the parking lot to shade the parking area at maturity. A minimum of half of the trees planted shall be no less than a 24-inch box trees or a 15 gallon trees. Palm trees shall not be used to meet this requirement.

6. **Pedestrian Walkway.** Within the surface-parking lot area, Projects shall provide at least one centrally located pedestrian walkway that runs the length of the parking lot from the sidewalk to the building entrance and is separated from the parking lot by landscaping and shade trees.

7. **Vehicular Access.** Projects involving new buildings shall provide vehicular access from an alley or side street when available. Vehicular access from the Primary Frontage is prohibited unless the LADOT determines that no other reasonable alternative exists.

8. **Curb Cuts.** Curb cuts shall be limited to the minimum number permitted as determined by LADOT and parking/loading entries into buildings shall be limited to the minimum number required and the minimum width permitted by the LAMC.

**F.** **Signs.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following signage regulations:

1. **Prohibited Signs.** The following types of signs are prohibited: pole signs; illuminated architectural canopy signs; Feather Signs; digital displays; and Canister/Can/Cabinet Signs.

**G.** **Equipment, Fencing and Utilities.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction and additions shall comply with the following equipment and utility regulations:

1. **Security Devices.** Interior roll-down doors and security grilles that are at least 75 percent transparent (open), retractable, and designed to be fully screened from view during business hours are permitted. The following security devices are prohibited in all Projects:

   (a) Permanently affixed exterior security grilles or bars.

   (b) Exterior accordion (or scissor) gates.

   (c) Exterior roll-down doors that are less than 75 percent transparent



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(d) Exterior roll-down housing that is visible from the sidewalk.

2. **Mechanical Equipment.** Mechanical equipment shall be screened from public view using non-reflective materials or other material consistent with or complementary to the overall design of the building.

3. **Fencing.** Chain link fencing (with or without slats), corrugated metal fencing, and barbed/razor wire is prohibited along a Primary Frontage or where a parcel is either directly adjacent to or across an alley from a property in the RD1.5 or more restrictive zone or a property containing a Community Facility.

4. **Refuse Enclosures.** Areas where trash and recycling containers are stored outside shall be fully enclosed, including roofing, with solid masonry walls or other materials that have been determined to prevent the release of refuse odors.

**H. Auto-Related Use and New Automobile Sales Standards.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with Auto-Related Uses or New Franchise Automobile Sales Uses shall comply with the following regulations.

1. When a parcel is either directly adjacent to or across an alley from a residentially zoned property or a property containing a Community Facility, a solid masonry wall, at least six feet in height, for security and visual screening, shall be provided along the property line separating the parcel from the residentially zoned property or property containing a Community Facility.

2. No permit shall be issued until a covenant has been recorded on the subject property in a form and manner approved by the Department of City Planning, for the life of the use, demonstrating the following requirements shall apply:

   (a) All actual repair or installation work shall be conducted within an enclosed building.

   (b) All vehicles undergoing, or awaiting, repair or pick-up shall be parked on-site. Vehicles stored overnight shall be parked on-site. No on-street parking spaces shall be utilized for storage or parking of vehicles. Storage of or parking of vehicles for 30 or more days is prohibited.

   (c) Equipment or parts removed from vehicles during the repair process shall be stored indoors or shall be deposited in an approved covered outdoor collection receptacle for appropriate off-site disposal.

   (d) All loading and un-loading of vehicles shall be done on-site.



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## Section III-4. PARKING REGULATIONS

**A.** **Required Parking Spaces.** The required number of parking spaces for Projects with new construction shall be set forth in the applicable provisions of the LAMC except as provided in Table III-4, and as set forth below.

1. **Guest Parking.** Residential guest parking spaces may be provided through shared use of required commercial parking spaces in Mixed-Use Projects.

2. **Eligible Historic Resources.** That portion of a Project involving the Restoration or Rehabilitation of an Eligible Historic Resource shall be exempt from all off-street parking requirements so long as the existing number of parking spaces are retained.

3. **Parking Incentives.** CPIO Affordable Housing Projects and certain identified commercial uses may reduce the required parking as set forth in Table III-4.

**B.** **Change of Use.** No additional parking shall be required for a change of use in an existing building from a non-residential use to a non-residential use permitted in the C1.5 zone.



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# TABLE III-4:
# PARKING REGULATIONS

| Subareas: E (TOD Low); F (TOD Medium); G (TOD High); and H (TOD Regional) | |
|---|---|
| **Parking Standards** | **Subarea** |
| Projects that establish a Targeted Commercial Use other than a sit-down restaurant, may reduce the required parking for the Targeted Commercial Use by 25%. | E |
| CPIO Affordable Housing Projects may choose from the following 3 options:<br>Options 1 and 2 – the same two options as set forth in LAMC Subsection 12.22 A.25(d).<br>Option 3 – 25% less parking for the entire Project. | E |
| CPIO Affordable Housing Projects may choose from the following 3 options:<br>Options 1 and 2 – the same two options as set forth in LAMC Subsection 12.22 A.25(d).<br>Option 3 – 50% less parking for the entire project. | F, G, H |
| Projects that establish a Targeted Commercial Use, other than a sit-down restaurant, may reduce the required parking for the Targeted Commercial Use by 50%. | F, G, H |
| In new buildings, Sit-Down Restaurants of any size may provide a minimum of 1 parking space per 500 square feet of floor area. | E, F, G, H |
| Projects that establish a hotel, Professional Office Use, or Research and Development Use may reduce the required parking for that use by 25%. | G, H |



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## CHAPTER V - RESIDENTIAL SUBAREAS

## SUBAREA TYPES

M – Legacy Single-Family Residential
N – Multi-Family Residential
O – Character Residential

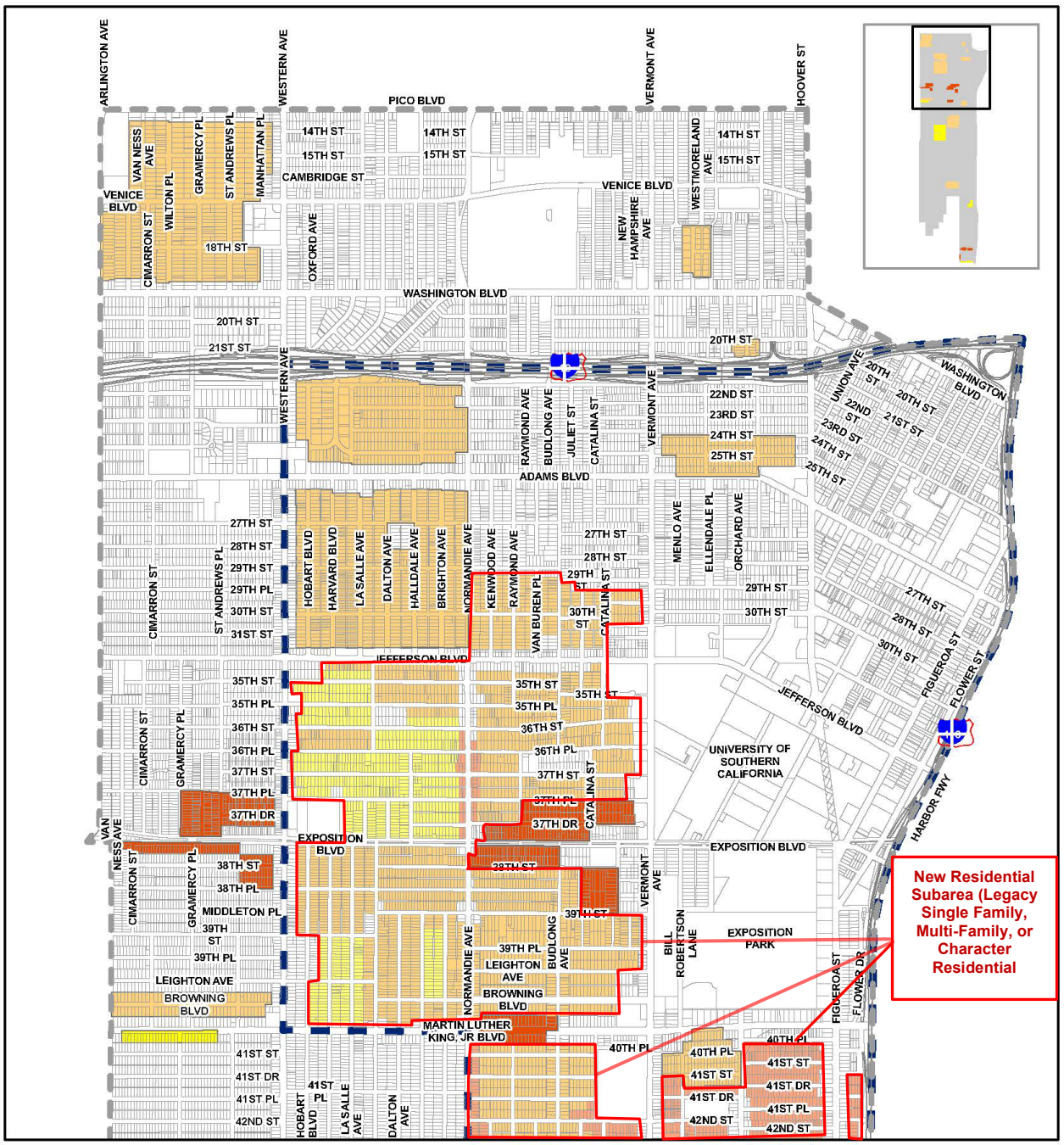
## OVERVIEW

The Residential Subarea Types M, N and O encourage well-designed projects that are compatible with the surrounding neighborhood scale and character as described in Chapter 1, Section I-3 and consistent with the purposes set forth in Chapter 1, Section I-2.

The intent of these supplemental development regulations in this Chapter V is to strengthen residential neighborhood stability and guide new infill residential development to be consistent with prevailing neighborhood character. For all Residential Subarea types, Projects must meet basic design standards for front façades, front yards, roof forms, and building materials. Projects within a Residential Subarea (See Figures V-1, V-2, and V-3) shall comply with the applicable supplemental development regulations in this Chapter.



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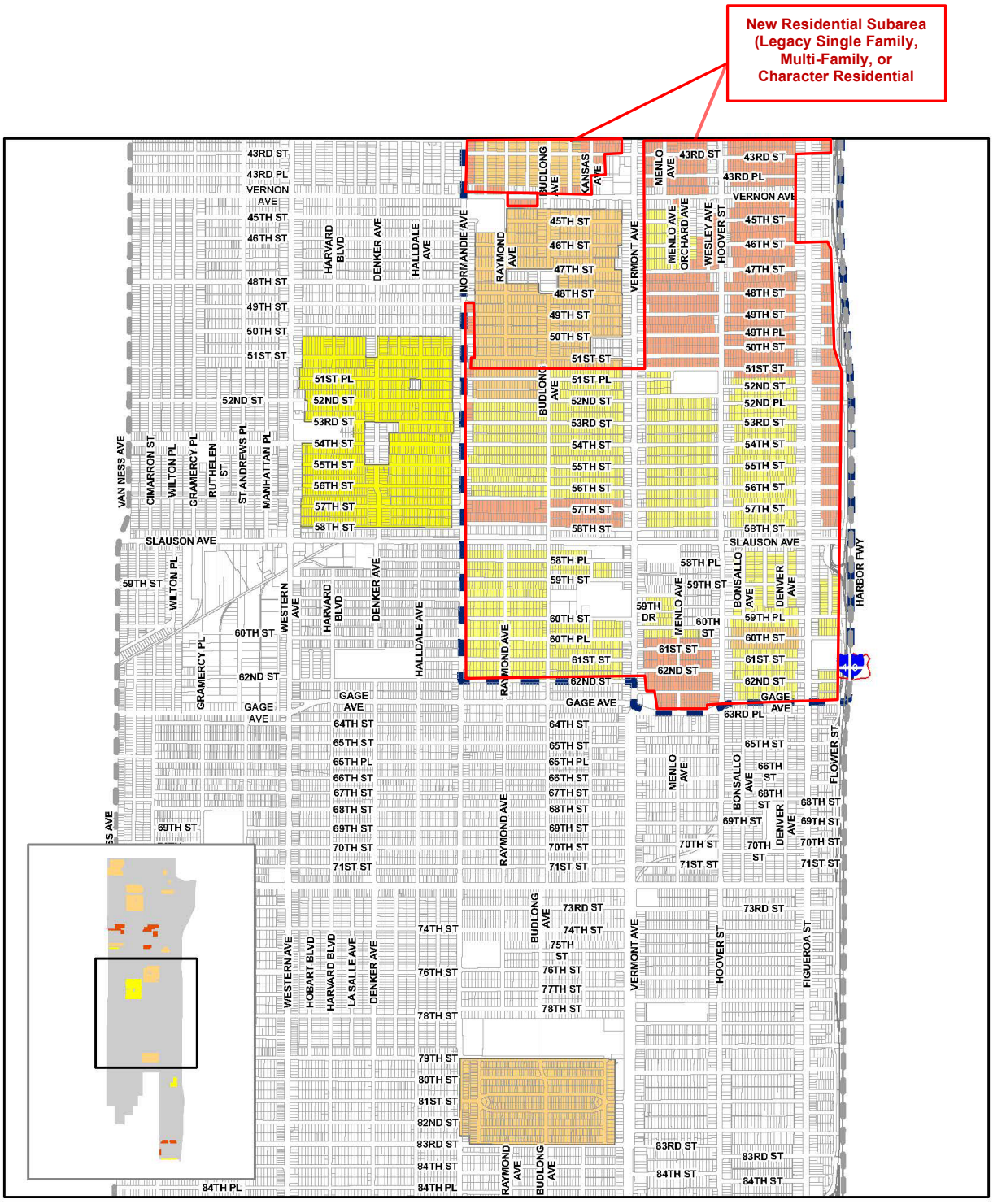



**Figure V-2, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary



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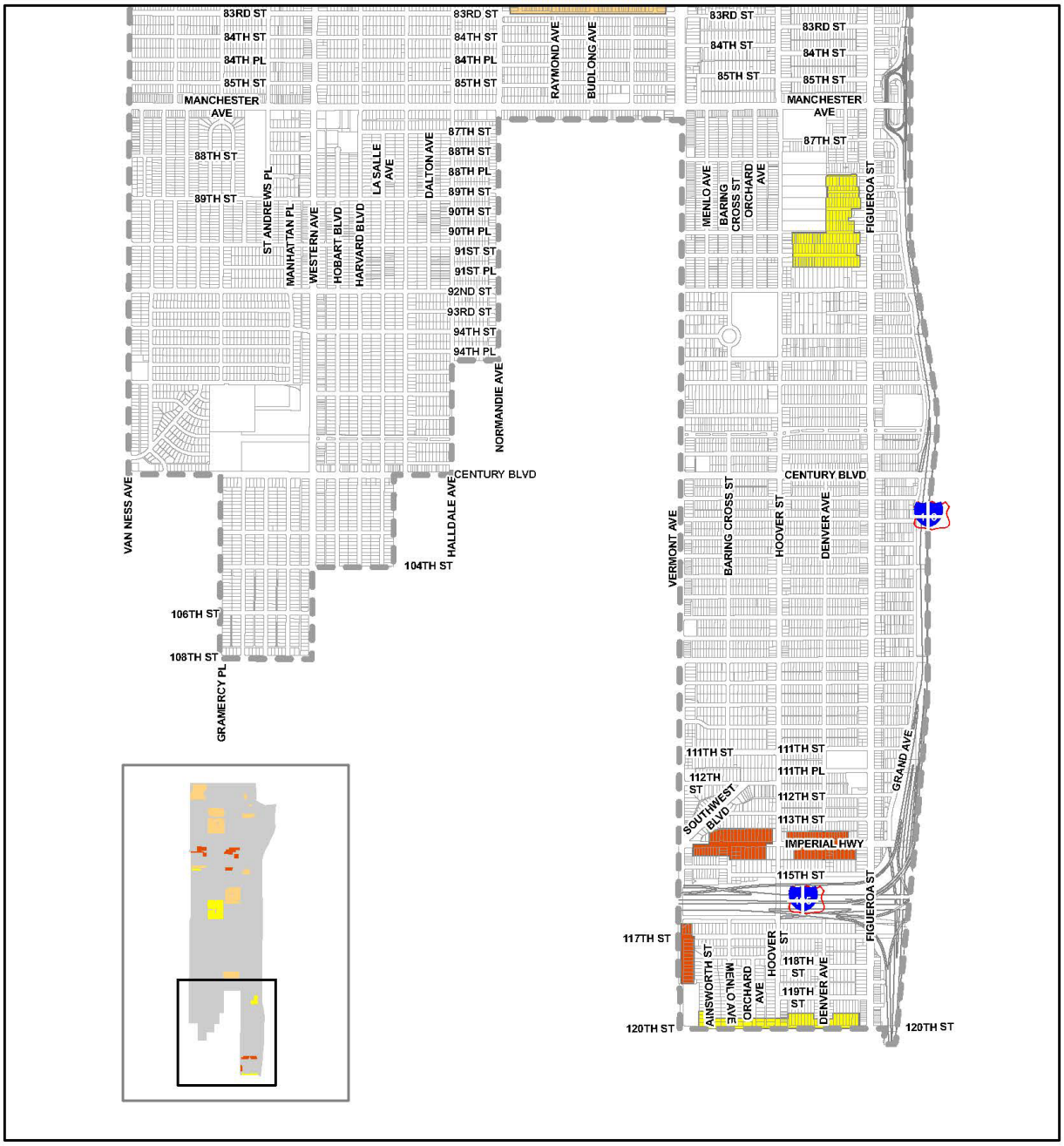



**Figure V-3, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea N - Multi-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

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Miles

Chapter 5 - RESIDENTIAL SUBAREAS



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## Section V-1 APPLICABILITY

**A.** **Purpose.** The purpose of this section is to strengthen residential neighborhood stability and to promote the preservation of affordable housing.

**B.** **Designated Residential Subareas.** Only Residential Subareas within the "CPIO Protected Unit Area" (Figure V-1 and Figure V-2) are subject to Section V-1 C and Section V-1 D.

**C.** **Los Angeles Housing Department (LAHD) Determinations.** A determination issued by LAHD is required prior to the issuance of any building permit for Projects in Designated Residential Subareas, subject to the following provisions:

**1.** **No Net Loss.** Projects shall provide at least as many residential dwelling units as the greatest number of residential dwelling units that existed on the property within the past 5 years.

**2.** **Replacement of CPIO Protected Units.** Each CPIO Protected Unit shall be replaced on a one-for-one basis, containing at least the same floor area in addition to the same number of bedrooms and bathrooms, with an affordability level equaling like-for-like, or lower.

(a) In the absence of floor area documentation, floor area shall default to at least the average unit size of comparable CPIO Protected Units. Existing, proposed, and/or default floor area calculations shall be provided by the applicant and verified by the Department of City Planning.

(b) In the absence of occupant income documentation, affordability levels shall default to the extremely low-income level.

(c) This provision does not apply to: (1) a Project that consists of an owner-occupied Single Family Dwelling Unit on a site where a Single-Family Dwelling unit is demolished, and (2) a Project that consists of 100% lower income units except Manager's Unit.

**3.** **Occupant Protections.**

(a) **Right to Remain.** All occupants of CPIO Protected Units being displaced by the Project have the right to remain in their unit until six months before the start of construction activities. Any existing occupants that are required to leave their units shall be allowed to return at their prior rental rate if the demolition does not proceed and the property is returned to the rental market.

(b) **Relocation.** All Lower Income Household (as defined in California Health and Safety Code Section 50079.5) occupants of CPIO Protected Units are entitled to relocation benefits subject to Chapter 16 (commencing with Section 7260) of Division 7 of Title 1.

(i) Project applicants required to provide relocation benefits shall develop, submit, and adhere to an approved relocation plan and hire a city-approved consultant to provide required relocation services.

(c) **Right to Return.** All Lower Income Household (as defined in California Health and Safety Code Section 50079.5) occupants of CPIO Protected Units are entitled to the right to return ("right of first refusal") to a replacement unit at the completed Project. If at the time of lease up or sale (if applicable) of a replacement unit, a returning occupant remains income eligible for an "affordable rent" (as defined in California Health and Safety Code Section 50053) or if for sale, at an "affordable housing cost" (as defined in California Health and Safety Code Section 50052.5), owner must also provide the replacement unit at the "affordable rent" or "affordable housing cost", as applicable.

(i) This provision does not apply to: (1) a Project that consists of an owner-occupied Single-Family Dwelling Unit on a site where a Single-Family Dwelling unit is demolished, and (2) a Project that consists of 100% lower income units except Manager's Unit.

(d) Refer to Appendix B for additional Tenant Protection Resources.

**D. Demolition and Permit Delay.** Except for the areas south of Martin Luther King Blvd within the "CPIO Protected Unit Area", no demolition permit shall be issued for any Project with existing structures more than 45 years old unless a new construction Project has been reviewed and approved by the Director of Planning pursuant to Section I-6. This provision does not apply to Projects with existing structures that are deemed hazardous or a public nuisance by the Department of Building and Safety, Los Angeles Police Department, or Los Angeles Fire Department

## Section V-2. LAND USE REGULATIONS

No additional land use regulations apply.

## Section V-3. DEVELOPMENT STANDARDS

Projects in the Residential Subareas are subject to the following development standards.

**A. Building Height.** In addition to the height standards established by the underlying zone and height district, Projects with new construction or additions shall comply with the following building step-back requirements:

1. **Subarea M (Legacy Single-Family Residential).** [Q]R4 (Faith Based), a~~A~~ny story above the first story shall be stepped back a minimum of 10 feet from the first floor Primary Frontage facade or 30 feet from the Primary Lot Line, whichever is less restrictive.

2. **Subarea N (Multi-Family Residential).** No additional height regulations apply.

3. **Subarea O (Character Residential).** Except for properties zoned [Q]R4 (Faith Based) and R1R3 (Single Family - Rear Mass Variation Zone), the portion of a building above thirty feet shall be stepped back a minimum of 10 feet from the Primary Frontage façade.

**B. Building Density & Floor Area Ratio (FAR).** In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following density and FAR regulations:

1. **Density**

(a) **Subarea M (Legacy Single-Family)**

No additional density regulations apply.

(b) **Subarea N (Multi-Family Residential)**

No additional density regulations apply, except that Residential Projects in the Exposition Park Square Character Residential neighborhood (Figure V-C), shall be limited to a maximum density of 1 unit per 1,200 square feet of lot area (1/1200) in the R3 zone.

(c) **Subarea O (Character Residential)**

No additional density regulations apply, except that Residential Projects in the Exposition Park Square Character Residential neighborhood (Figure V-C), shall be limited to a maximum density of 1 unit per 1,200 square feet of lot area (1/1200) in the R3 zone.

2. **FAR**

(a) **Subarea M (Legacy Single-Family), Subarea N (Multi-family Residential), and Subarea O (Character Residential)**

No additional FAR regulations apply.

**C. Building Disposition.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following disposition regulations:

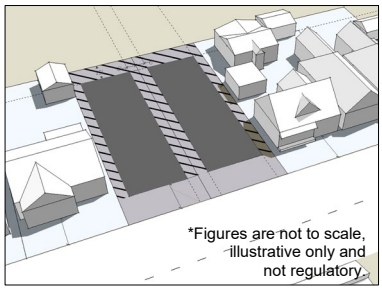
1. **Bulk and Massing.**

(a) **Subarea M (Legacy Single-Family Residential) and Subarea N (Multi-Family Residential).** No additional bulk and massing regulations apply.



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(b) **Subarea O (Character Residential)**




(i) For Projects on a Unified Lot, all buildings shall be designed to maintain the side and rear yard setback dimensions associated with the original individual lots set forth in C.2 (b)(ii) below. A Project may not rely on the status of the lots being Unified Lots to waive or modify setback,yard area, or any other development standards related to bulk and massing. (See figure for illustrative example of this regulation.)

(ii) Except for properties zoned [Q]R4 (Faith Based) and R1R3, the total cumulative length of any side elevation above the first floor shall not extend more than 60 percent of the lot depth or 80 feet, whichever is less.

2. **Setbacks**

(a) **Subarea M (Legacy Single-Family Residential) and Subarea N (Multi-Family Residential).** No additional setback regulations apply.

(b) **Subarea O (Character Residential)**

(i) **Front.** The Primary Frontage shall be located no closer to the street than the Primary Frontage of the adjacent residential building closest to the street, and shall be located no further from the street than the Primary Frontage of the adjacent residential building farthest from the street.

(ii) **Side and Rear.** The side and rear setback dimensions shall be as set forth in the underlying zone, except as follows:

(1) New construction, including additions to existing buildings, on Unified Lots shall not encroach into side and rear setback areas associated with the original individual lots in accordance with C.1(b)(1) above.

(2) The side and rear yard setback requirements shall not apply to accessory buildings (including but not limited to, garages, recreation rooms) provided the following requirements are met:

(3) The accessory building's footprint shall not exceed10 percent of the overall square footage of the lot, the height



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shall not exceed 15 feet, and the building shall be a single story.

(4) The accessory building shall be detached from the main house and set back a minimum of 10 feet, as measured from the rear most façade of the main house.

(5) In addition to the allowable yard projections in LAMC Section 12.22.C.20, loggias (covered walkways), gazebo structures and pools may encroach into the rear and side yard setback areas that are internal to Unified Lots.

(6) Where the yard setback dimensions in this Chapter V are more restrictive than those set forth in the underlying zone, including LAMC Sections 12.22.C.27 (Small Lot Subdivisions) and 12.08 (R1R3 Variation Zone), the more restrictive setbacks shall prevail.

(7) The accessory building requirements of this subsection (ii) shall not apply when in conflict with projects built under State ADU Law and LAMC Section 12.22 A.33.

3. **Parking Areas, Garages and Carports.** Projects with onsite parking shall conform to the following standards:

(a) **Subarea M (Legacy Single-Family Residential)**

(i) No parking areas shall be allowed between the Primary Frontage and the Primary Lot Line, except required driveways.

(ii) Detached or attached garages, parking areas, and carports associated with the construction of a new building shall be located behind any main building(s).

(iii) Projects that involve the construction of a new building(s) shall provide one additional on-site parking space for every bedroom over 3 bedrooms per dwelling unit. Within the "CPIO Protected Unit Area", notwithstanding LAMC Section 12.21 A.5(h), tandem parking shall not be limited to a depth of two cars and shall be located within designated driveways in accordance with the state law.

(iv) Curb cuts shall be limited to the minimum number permitted as determined by LADOT and driveway widths shall be the minimum width permitted by the LAMC.

(b) **Subarea N (Multi-Family Residential)**

(i) No parking areas shall be allowed between the Primary Frontage and the Primary Lot Line, except for required driveways.

(ii) Detached garages and carports associated with the construction of a new building shall be located behind any main building(s).

(iii) Attached parking areas shall be located either underground (subterranean or semi-subterranean), or behind any main building(s).

(iv) Any semi-subterranean parking areas (i.e. parking podiums) shall include exterior façades that are integrated into the overall architecture of the building, and that are accompanied by a minimum three-foot landscape buffer that is landscaped with plants that, at maturity, adequately screen the parking area.

(v) Curb cuts shall be limited to the minimum number permitted as determined by LADOT and driveway widths shall be the minimum width permitted by the LAMC.

(c) **Subarea O (Character Residential)**

(i) No parking areas shall be allowed between the Primary Frontage and the Primary Lot Line, except for required driveways.

(ii) Detached garages and carports shall be located behind any buildings, except for single-family properties zoned R1R3, which shall comply with the detached garage regulations of LAMC Section 13.19.

(iii) Attached parking areas shall be located either underground (subterranean or semi-subterranean), or behind any buildings.

(iv) Any semi-subterranean parking areas (i.e. parking podiums) shall include exterior façades that are integrated into the overall architecture of the building, and that are accompanied by a minimum three-foot landscape buffer that is landscaped with plants that, at maturity, adequately screen the parking area.

(v) Access driveways shall be taken from alleys or side-streets when present.

(vi) Driveway widths shall be the minimum allowed by the LAMC.

4. **Front Yards.** Residential front yards shall not be paved or used for vehicular parking or storage. Pavement shall be used only for walkways and driveways. Residential front yards shall be landscaped with plant materials, decomposed granite, turf block or a combination thereof. Residential front yards shall be open and not obstruct the views of the home from the street.



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5. **Parkways.** Parkways, the area between the street and sidewalk, when present, shall be porous and landscaped and shall be covered by a pervious surface.

6. **Courtyards.** In Subarea O, a frontage of more than 100 feet shall incorporate a courtyard facing the street, at ground level, and open to the sky, that is at least 20 feet wide and 15 feet deep. For example, the building could be arranged on the lot in a U or L shape, around a central courtyard that faces a public street and is open to the sky.

7. **Site Assessment.** In coordination with the Urban Forestry Division, applicants shall provide an initial site assessment to evaluate and document the presence of existing trees. This assessment shall occur prior to a Project application being deemed complete and an accompanying report shall be included with the plans submitted for review and approval pursuant to Section I-6.

**D. Building Design.** In addition to any regulations set forth by the underlying zone and the LAMC, Projects with new construction or additions shall comply with the following design regulations:

1. **Primary Frontage.** A primary building entrance shall be provided that is directly visible and accessible from the Primary Lot Line, or individual entrances from a centrally located or common-access courtyard accessible from the Primary Lot Line. The primary building entrance(s) shall be accentuated by a canopy, recess, unique building materials, or another Architectural Feature that denotes the entrance against the rest of the façade.

2. **Roof Forms.** Projects that involve the construction of additions or new detached dwelling units shall utilize roof forms that are consistent with the existing roof forms of the main building or the prevailing roof forms of the surrounding neighborhood. For example, if a property is developed with a structure that has a 4/12 pitch gabled roof, the addition or second dwelling unit shall utilize the same gable roof pitch.

3. **Building Materials**

   (a) **Subarea M (Legacy Single-Family).** Projects shall utilize uniform building materials across all exterior facades, unless this requirement would conflict with requirements associated with new construction associated with Eligible Historic Resources. For example, if a property is developed with a house with exterior wood siding, an addition or new detached dwelling unit on the site shall utilize the same or substitute with materials that give the same appearance.

   (b) **Subarea N (Multi-Family Residential) and Subarea O (Character Residential)**



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(i) Projects shall utilize at least two building materials across all exterior façades of the building (e.g., wood window sashes, smooth stucco, wood, brick).

(ii) Rough texture stucco (e.g., lace, heavy dash, tunnel dash, heavy sand float) is prohibited.

4. **Articulation**

(a) **Subarea M (Legacy Single-Family).** No additional articulation regulations apply.

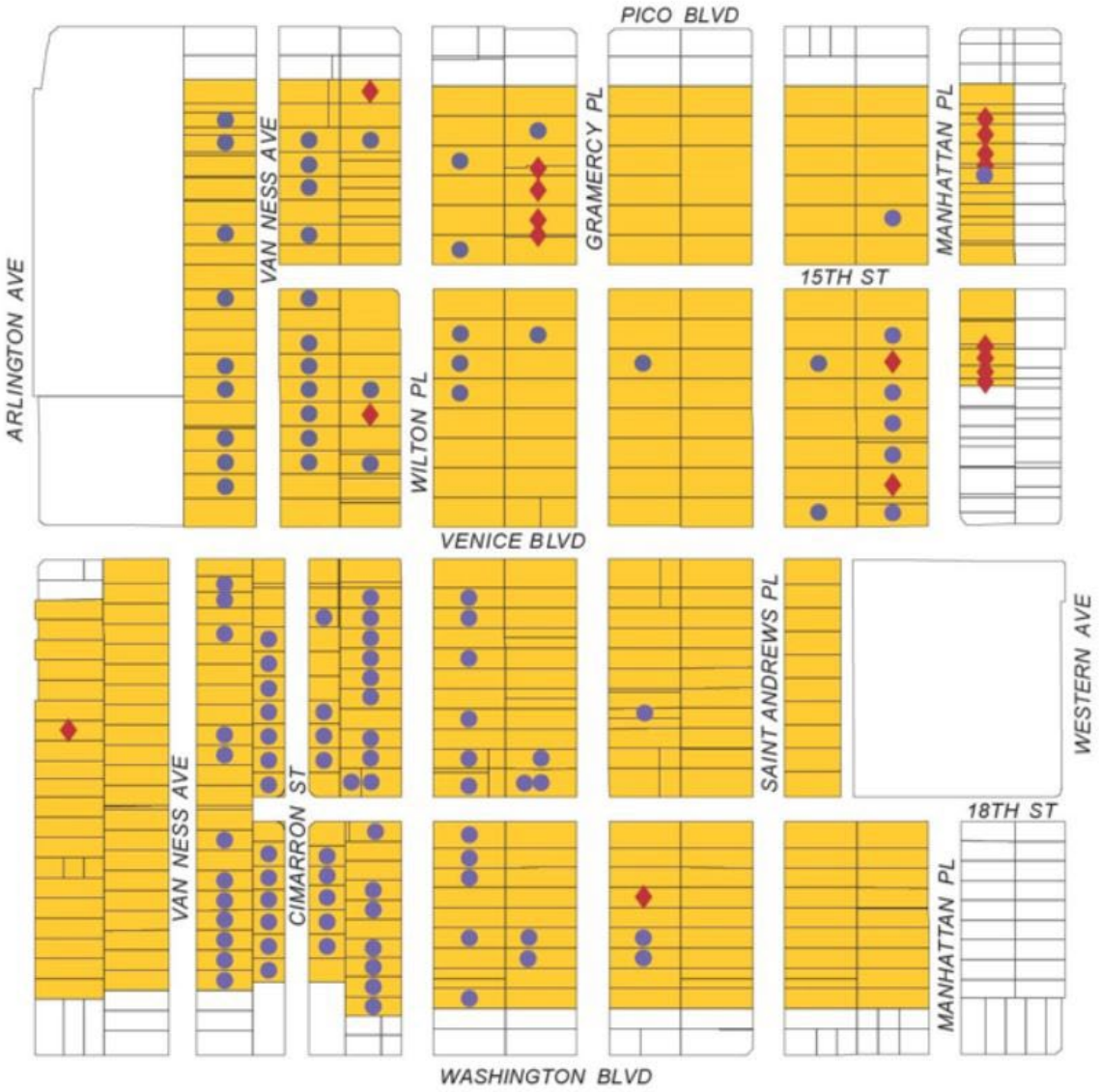
(b) **Subarea N (Multi-Family Residential) and Subarea O (Character Residential).** All exterior building walls shall provide a break in the plane or a change in material at least every 20 feet in horizontal length and every 15 feet in vertical length. Fenestration that is recessed a minimum of two inches from the outside wall may be counted as a break in plane.

**E.** **Historic Resources.** Any Project that qualifies as an Eligible Historic Resource shall comply with Chapter 1, Section I-6.C.5 of this CPIO.



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Figure V-A




***Note:*** *Eligible Historic Resources and Designated Historic Resources indicated on the map in Figure V-A are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*



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Figure V-B




**BROWNING DUPLEX**
**CHARACTER RESIDENTIAL CPIO SUBAREA**
South Los Angeles Community Plan Area

**Legend:**
Character Residential Subarea
Contributor

***Note:*** *Eligible Historic Resources and Designated Historic Resources indicated on the map in Figure V-B are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*



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Figure V-C




***Note:*** *Eligible Historic Resources and Designated Historic Resources indicated on the map in Figure V-C are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*



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Figure V-D




**UNIVERSITY PARK EXTENSION, MAGNOLIA AVE RESIDENTIAL & WASHINGTON GARDENS MULTI-FAMILY CHARACTER RESIDENTIAL CPIO SUBAREA**
South Los Angeles Community Plan Area

**Legend:**
- Character Residential Subarea
- Contributor

***Note:*** *Eligible Historic Resources and Designated Historic Resources indicated on the map in Figure V-D are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*



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Figure V-E




**VERMONT KNOLLS**
**CHARACTER RESIDENTIAL CPIO SUBAREA**
South Los Angeles Community Plan Area

**Legend:**
Character Residential Subarea
Contributor

***Note:*** *Eligible Historic Resources and Designated Historic Resources indicated on the map in Figure V-E are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*



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Figure V-G




***Note:*** *Eligible Historic Resources and Designated Historic Resources indicated on the map in Figure V-G are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*

*Figure V-F are for illustrative purposes only. Please refer to ZIMAS for the most current information regarding Survey LA and historic designation status.*



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# APPENDIX B

# TENANT PROTECTIONS RESOURCES

## OVERVIEW

As described in Section V-I C.3, Occupant Protections, the following is a resource for Tenant Protections. This resource includes a description of Relocation, Remedies/Private of Action, Right to return/Right of First Refusal, and Tenant Harassment as described in the Los Angeles Municipal Code. Rent Stabilization Ordinance, Tenant Habitability Program Ordinance, and the Housing Crisis Act. Compliance with tenant protections shall be achieved through the Los Angeles Housing Department (LAHD) and any relevant department which holds such jurisdiction. It is intended to reflect the most up to date resources and to be updated as additional laws and procedures come into practice.



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# Appendix B –TENANT PROTECTIONS RESOURCES

| Topic | Rent Stabilization Ordinance<br>LAMC Chapter XV<br>Section 151.00<br><br>Tenant Habitability Program Ordinance<br>LAMC, Chapter XV, Article 2 | Housing Crisis Act<br>LAMC Chapter IV, Article 19<br><br>CA Gov Code Section 66300 et seq. |
|---|---|---|
| Relocation | See: RSO Relocation Assistance Bulletin<br><br>Any tenant affected by Primary Renovation Work shall have the option to voluntarily terminate the tenancy in exchange for permanent relocation assistance as set forth in a Tenant Habitability Plan accepted by LAHD only if the work takes 30 or more days. If work takes less than 30 days tenants get temporary relocation;<br><br>When the eviction is due to condominium conversion, demolition or the property is going to be permanently removed from the rental housing market (Ellis Act), Landlords must file Notice of Intent to Withdraw Units from Rental Housing Use;<br><br>The amount of relocation assistance depends on whether the tenant is an Eligible or Qualified tenant, the length of tenancy, and the tenant's income. | See: SB 8; SB 8 Application; SB 8 Occupant Packet; SB 8 RUD Information Sheet<br><br>Occupants of Protected Units also are entitled to receive relocation pursuant to state or local law, whichever provides greater assistance |
| Remedies / Private Right of Action | Any person who demands, accepts or retains any payment of rent in excess of the maximum rent or maximum adjusted rent in violation of the provisions of this chapter, or any regulations or orders promulgated hereunder, shall be liable in a civil action to the person from whom such payment is demanded, accepted or retained for damages of three times the amount by which the payment or payments demanded, accepted or retained exceed the maximum rent or maximum adjusted rent which could be lawfully demanded, accepted or retained together with reasonable attorneys' fees and costs as determined by the court.<br><br>Any person violating any of the provisions, or failing to comply with any of the requirements, of this chapter shall be guilty of a misdemeanor. | Does not include Remedies language<br><br>Note: While SB 8 does not include Remedies language, any eviction will have a private cause of action under a general umbrella of "wrongful eviction." |



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| | | |
|---|---|---|
| | Any person who willfully or knowingly with the intent to deceive, makes a false statement or representation, or knowingly fails to disclose a material fact, in a notice or declaration required under Subsection C. or I. of Section 151.09 or in any declaration, application, hearing or appeal permitted under this chapter, including any oral or written evidence presented in support thereof, shall be guilty of a misdemeanor.<br><br>Nothing in this Article shall be construed to deprive a person of due process rights guaranteed by law, including, but not limited to, a right to appeal the Department's determination regarding a Tenant Habitability Plan to a hearing officer. | |
| Right to Return/<br>Right of First Refusal | Right to return to the same unit if a demolition does not occur | Both a right of first refusal to the new units and a right of return to the original units if demolition does not happen.<br><br>Right of first refusal for lower-income households:<br><br>(ii) A right of first refusal for a comparable unit available in the new housing development affordable to the household at an affordable rent, as defined in Section 50053 of the Health and Safety Code, or an affordable housing cost, as defined in 50052.5. |
| Tenant Harassment<br><br>LAMC Chapter IV, Section 151.33 | The Tenant Anti-Harassment Ordinance (TAHO) establishes a private right of action for tenants experiencing harassment (as defined in the ordinance) and it specifies the civil penalties that tenants can collect. It does not prohibit properties or owners with harassment claims or convictions from developing housing. | Does not include language restricting a project moving forward in instances where there is a history of tenant harassment on a property. |



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# EXHIBIT B.3:

# Existing CPIO Subareas Figure Maps

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA

for consideration by the City Planning Commission

November 17, 2022

# Figure I

## CPIO District Boundaries

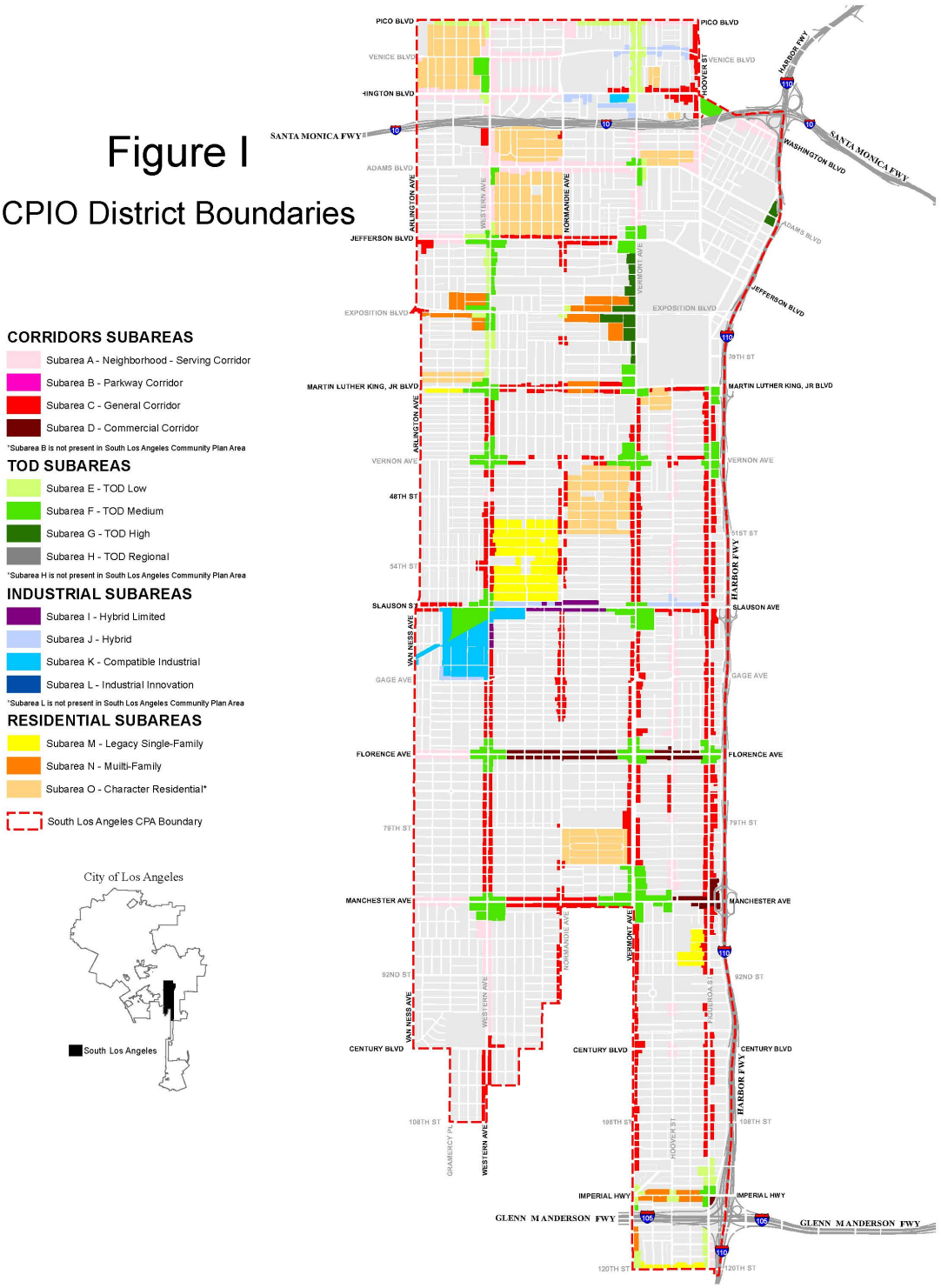





**FIGURE III-1. TOD SUBAREAS**

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- South Los Angeles CPA

0 0.4 Miles

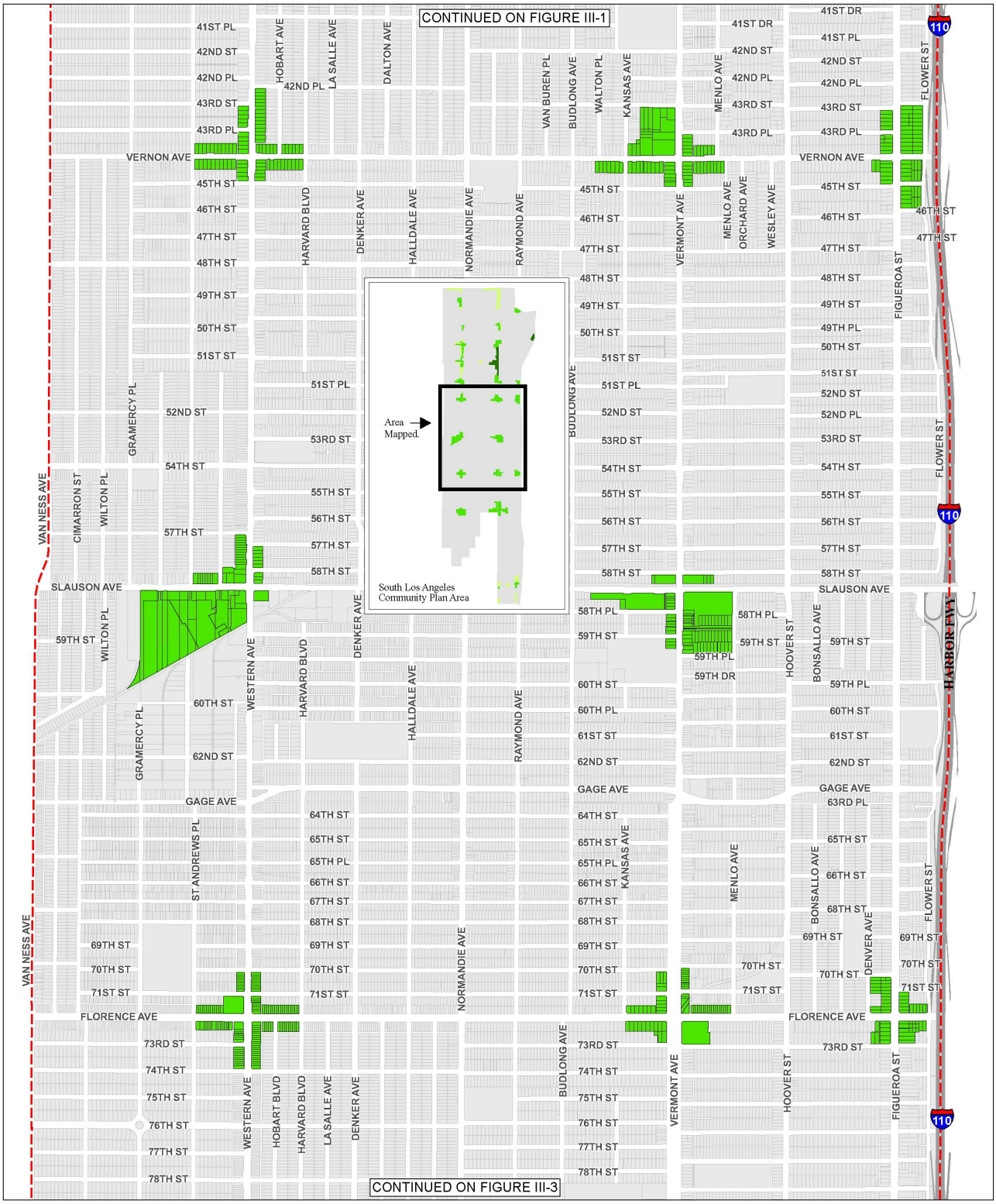



**FIGURE III-2. TOD SUBAREAS**

Subarea F - TOD Medium

South Los Angeles CPA

0 0.4 Miles

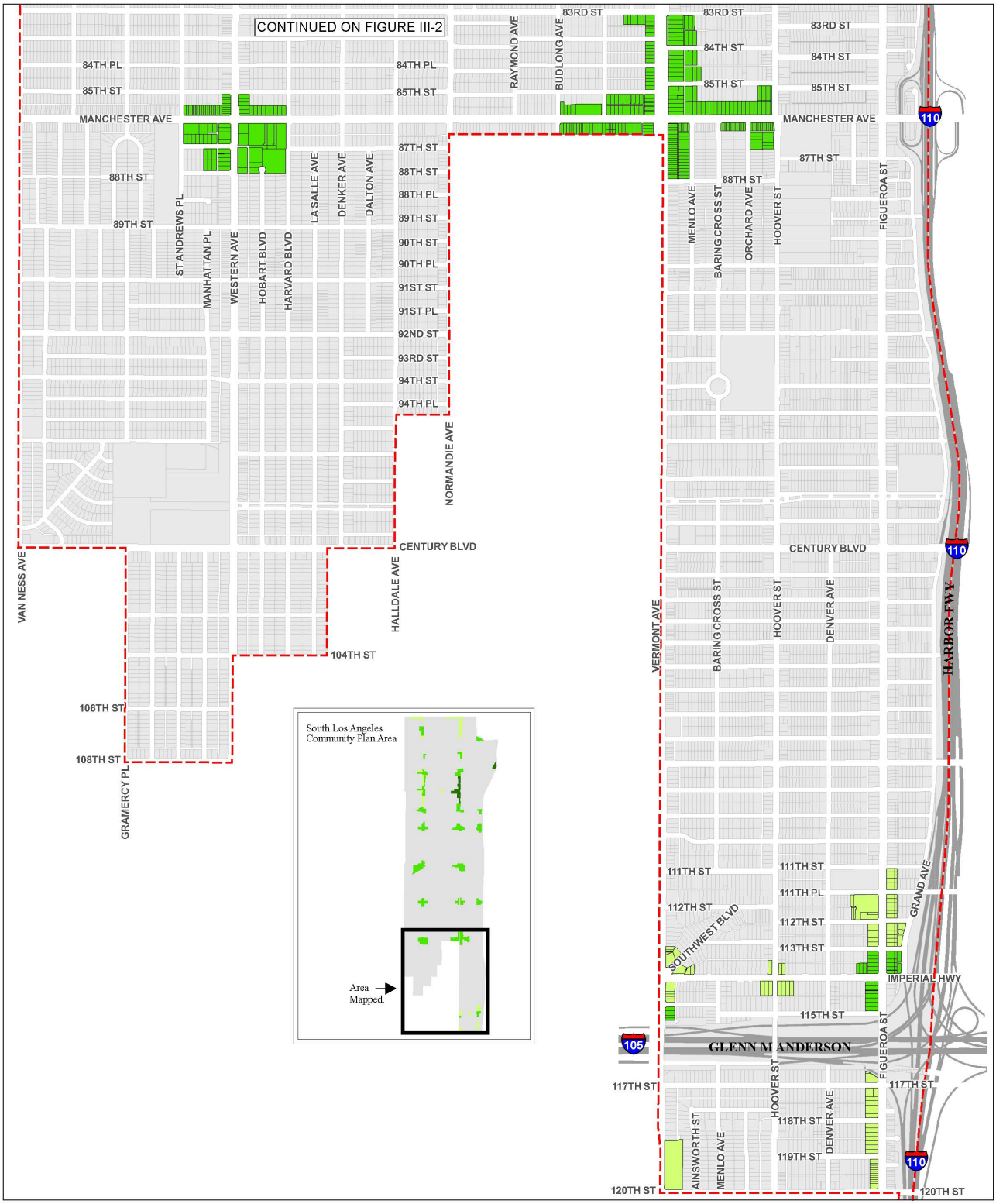



**FIGURE III-3. TOD SUBAREAS**

Subarea E - TOD Low

Subarea F - TOD Medium

South Los Angeles CPA

0 0.4 Miles

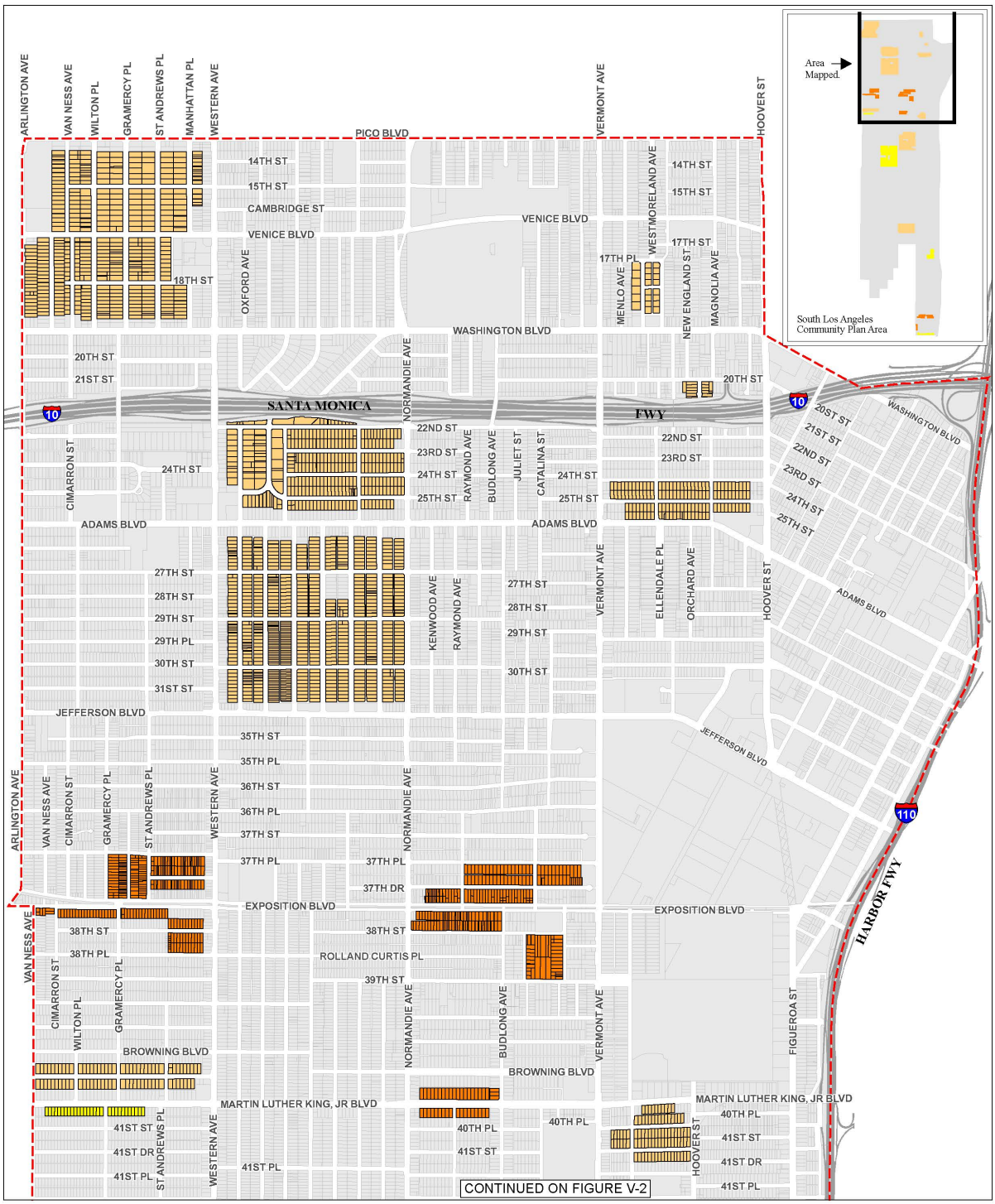



**FIGURE V-1. RESIDENTIAL SUBAREAS**

- Subarea M - Legacy Single-Family
- Subarea N - Multi-Family
- Subarea O - Character Residential
- South Los Angeles CPA

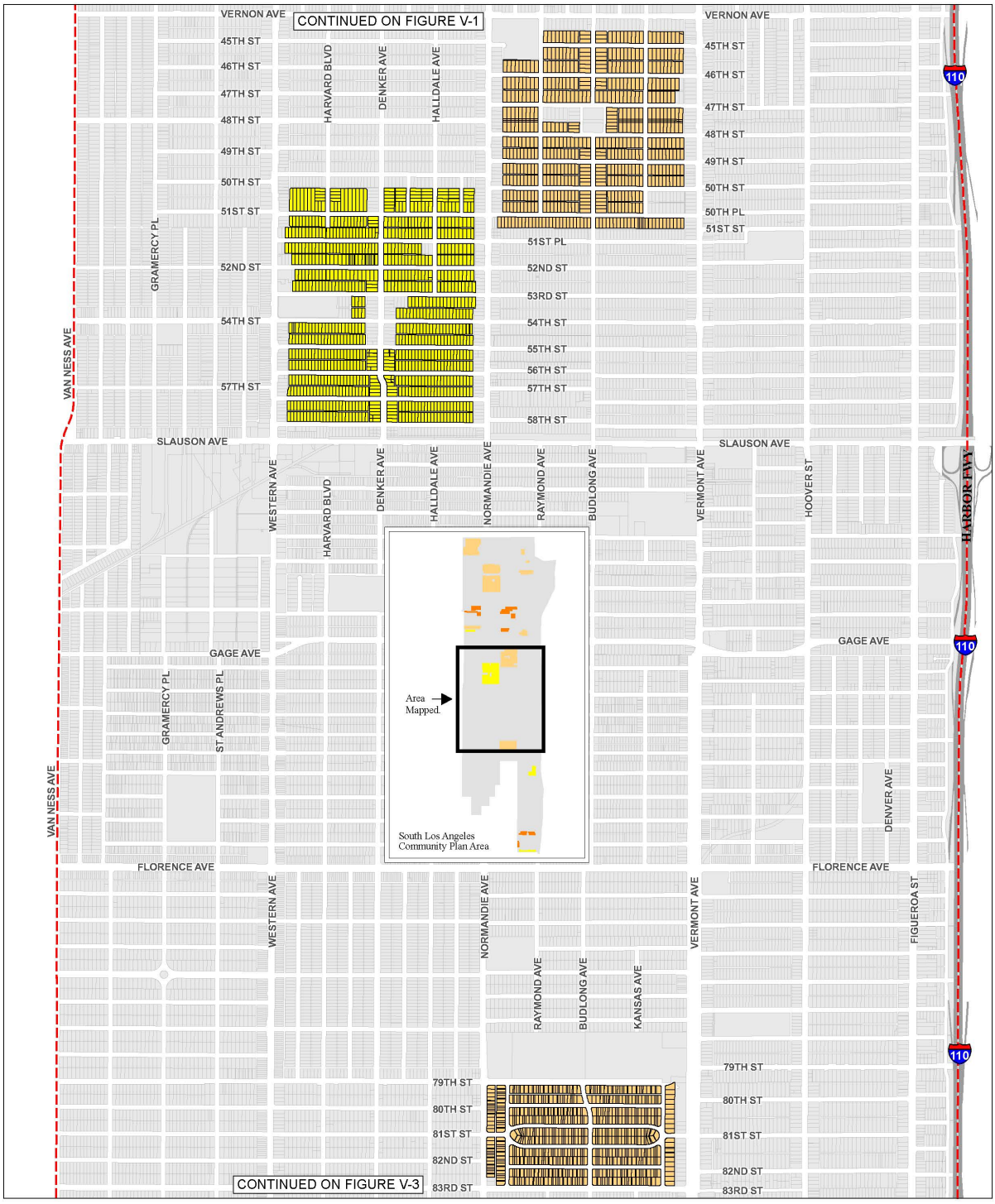



**FIGURE V-2. RESIDENTIAL SUBAREAS**

Subarea M - Legacy Single-Family

Subarea O - Character Residential

South Los Angeles CPA

0 0.4 Miles

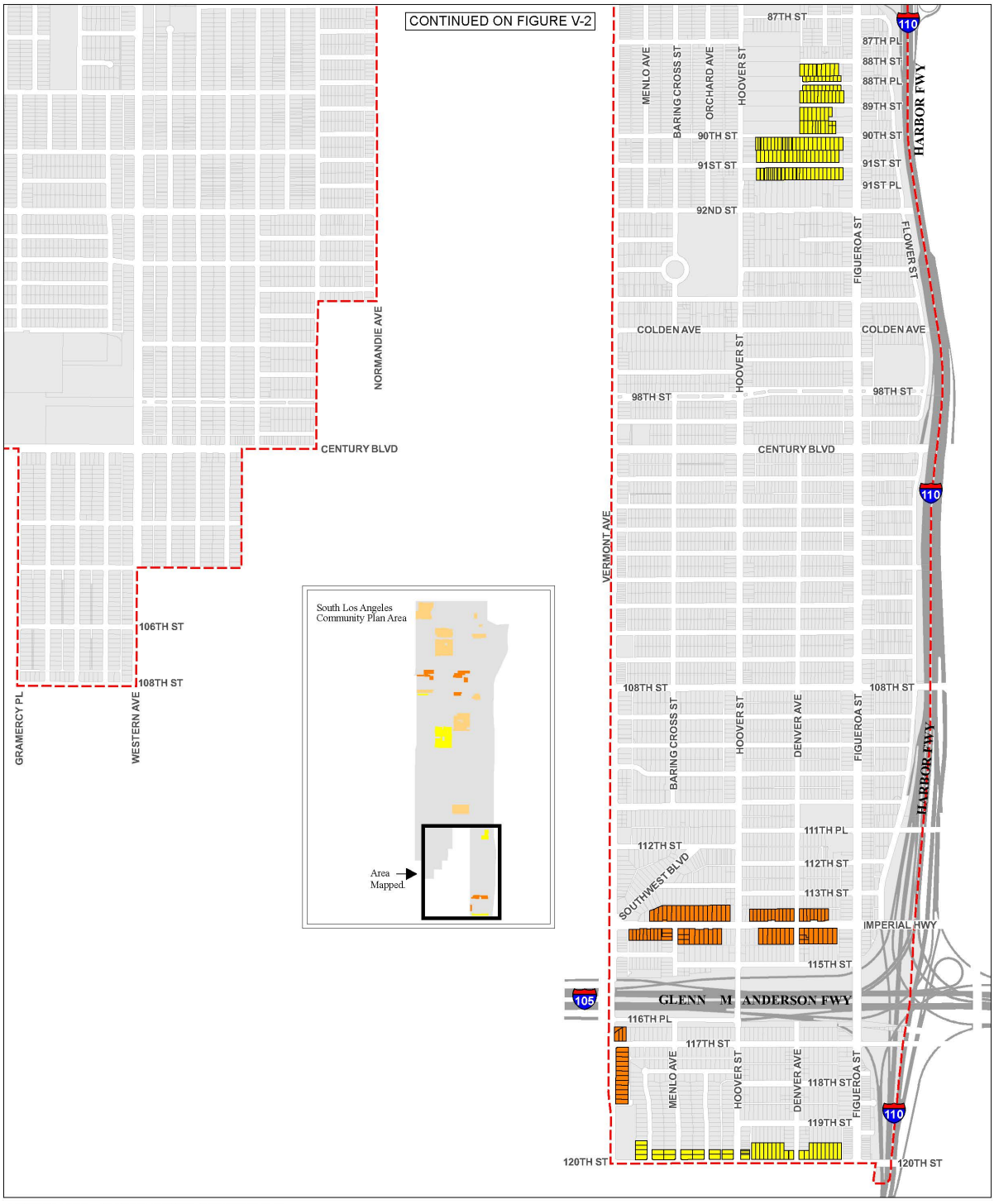



**FIGURE V-3. RESIDENTIAL SUBAREAS**

Subarea M - Legacy Single-Family

Subarea N - Multi-Family

South Los Angeles CPA

0 0.4 Miles

# EXHIBIT B.4:

# Proposed CPIO Subareas Figure Maps

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

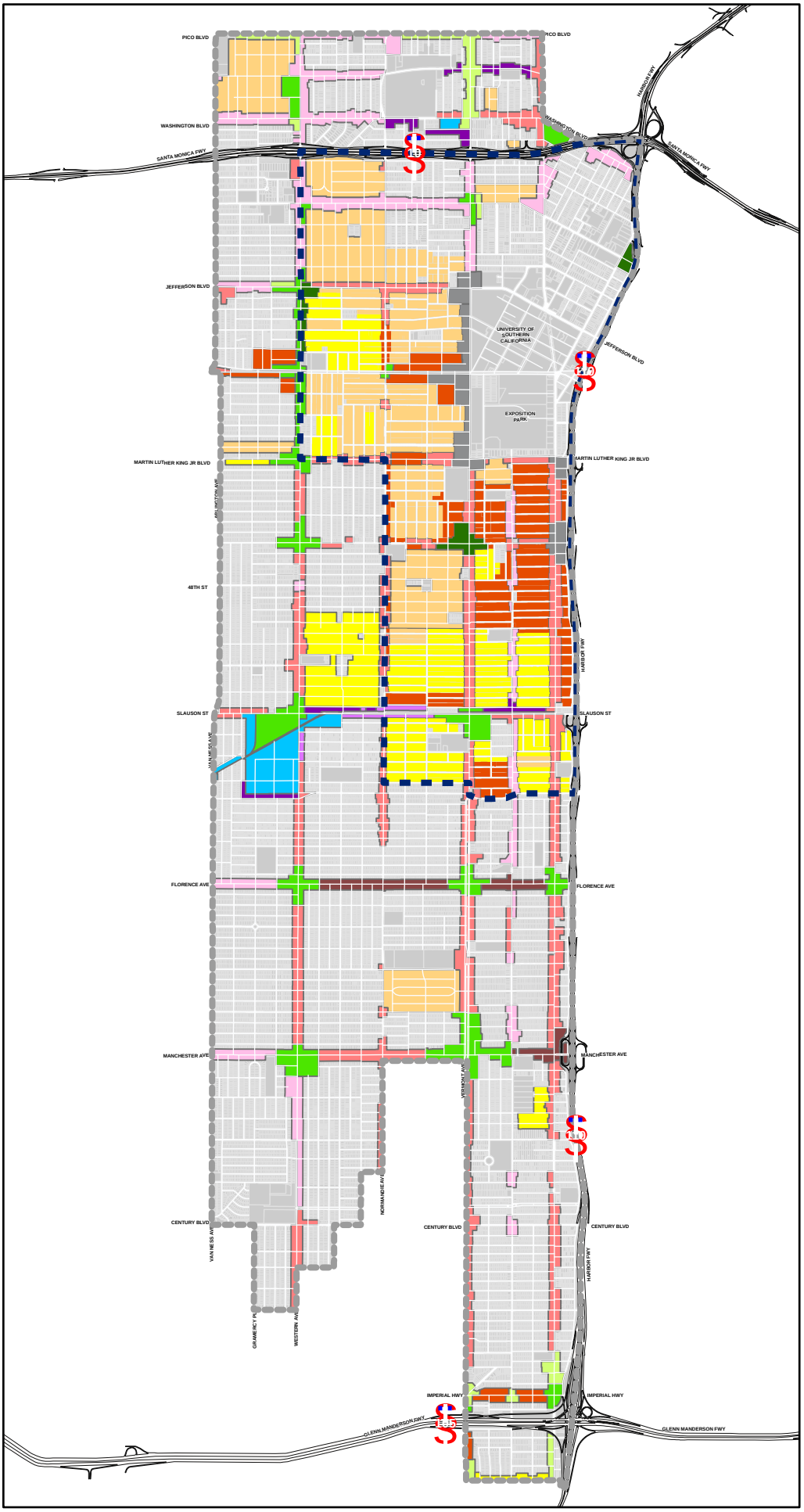
CPC-2022-5432-ZC-CPIOA

for consideration by the City Planning Commission

November 17, 2022

# EXHIBIT B.4

## Figure 1
## CPIO District Boundary




**CORRIDORS SUBAREAS**
- Subarea A - Neigborhood-Serving Corridor
- Subarea B - Parkway Corridor
- Subarea C - General Corridor
- Subarea D - Commercial Corridor

TOD SUBAREAS
- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional

**INDUSTRIAL SUBAREAS**
- Subarea I - Hybrid Limited
- Subarea J - Hybrid
- Subarea K - Compatible Industrial
- Subarea L - Industrial Innovation

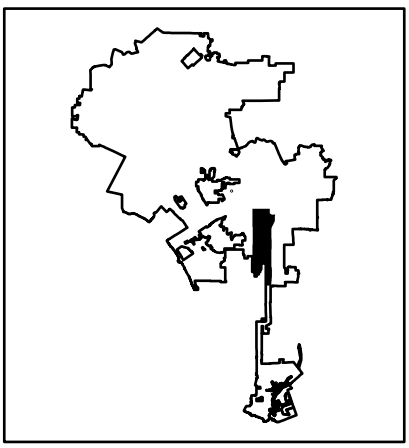
**RESIDENTIAL SUBAREAS**
- Subarea M - Legacy Single-Family (R2)
- Subarea N - Multi-Family
- Subarea O - Character Residential

South Los Angeles CPA

CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1 Miles



# EXHIBIT B.4

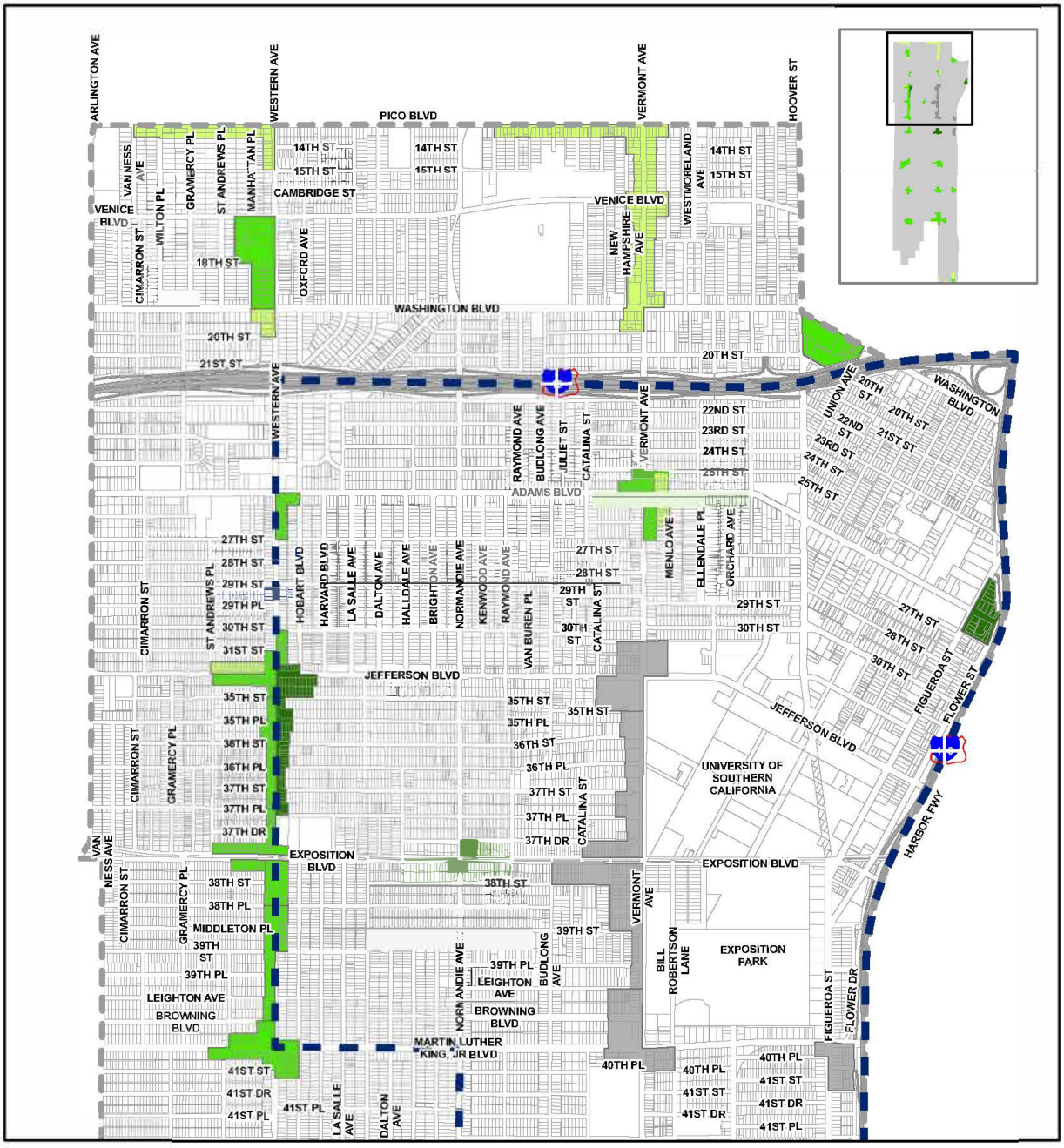



**Figure III-1, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

Chapter 3 - TOD SUBAREAS

# EXHIBIT B.4

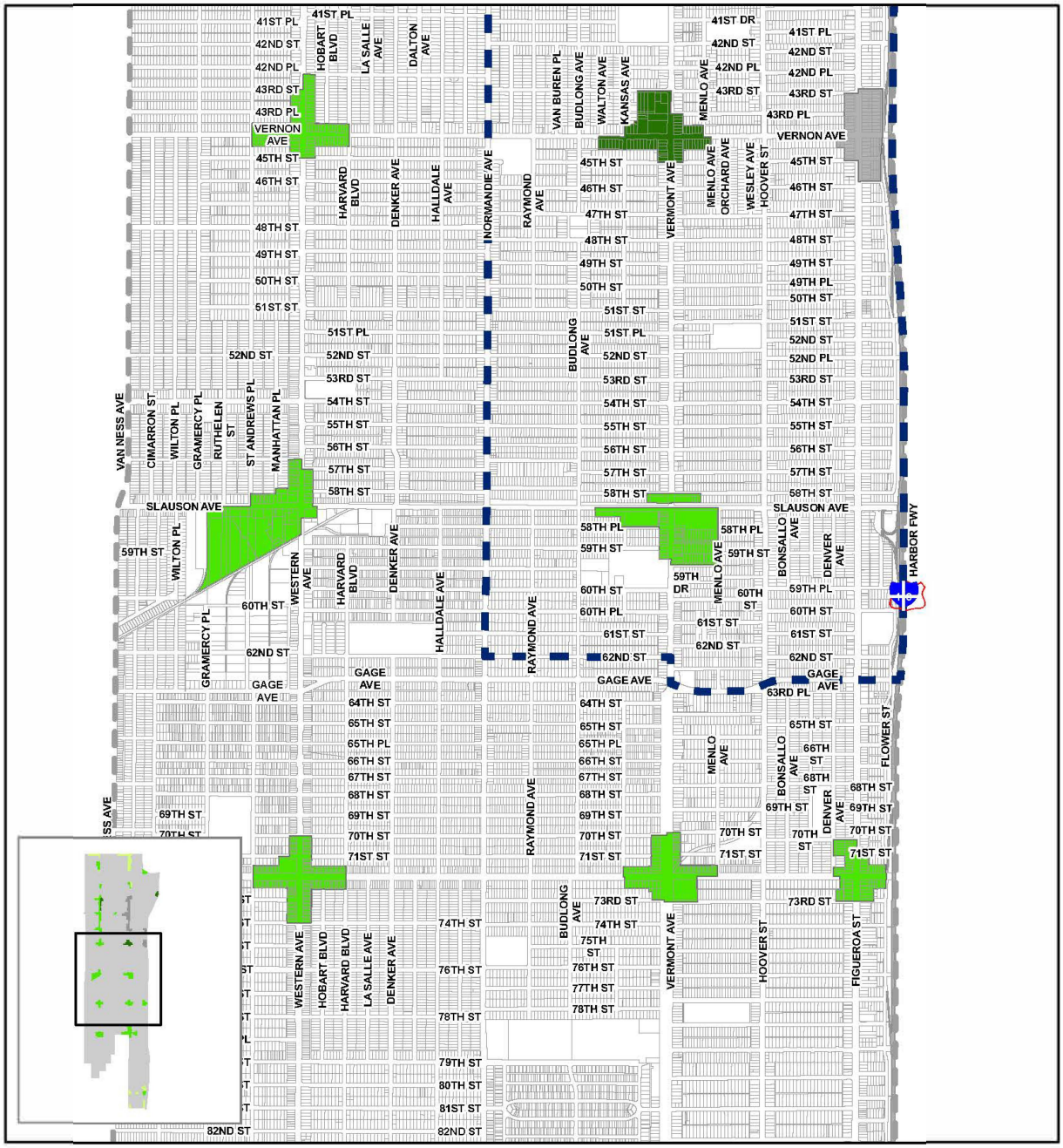



**Figure III-2, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

Chapter 3 - TOD SUBAREAS

# EXHIBIT B.4

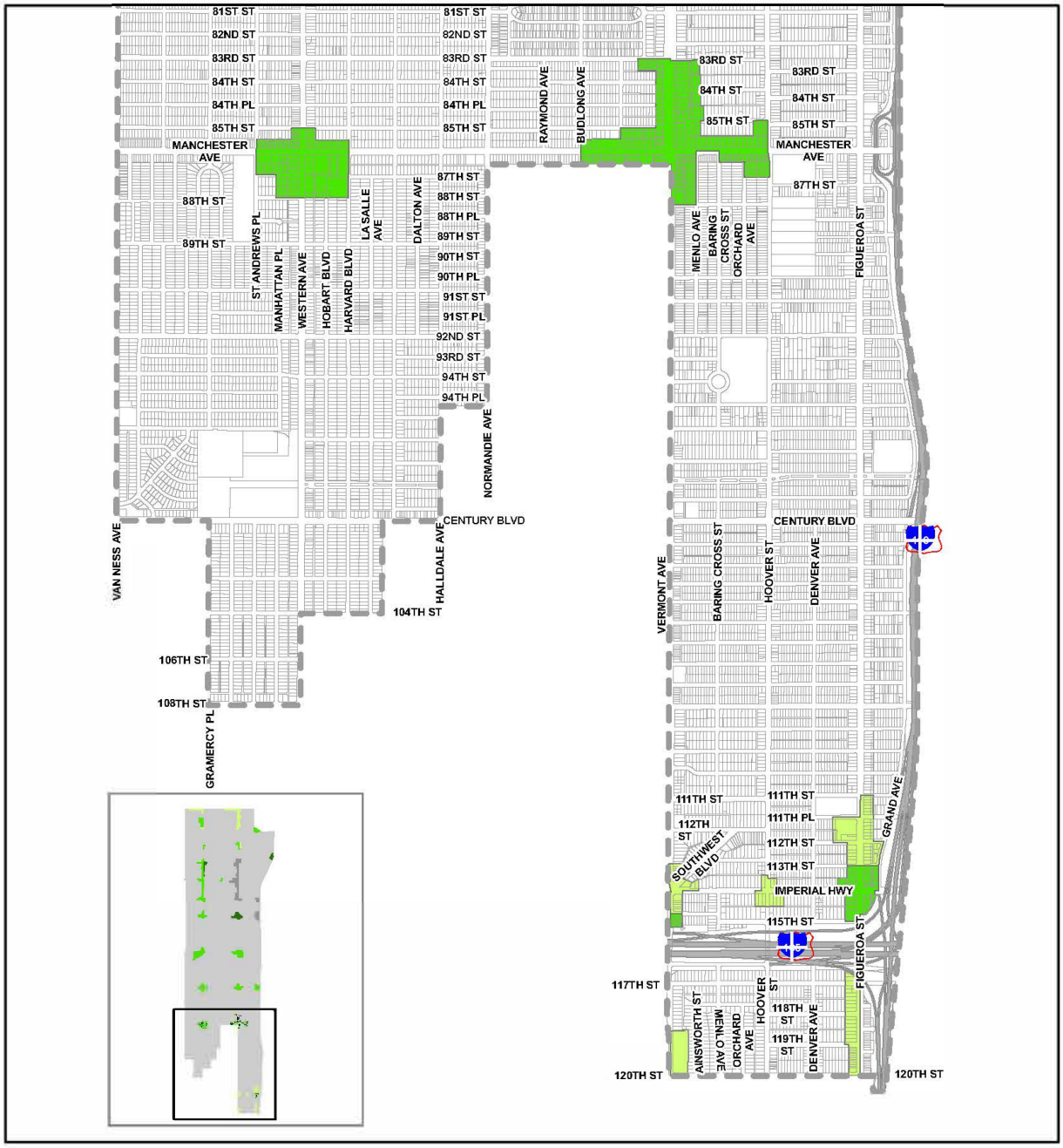



**Figure III-3, TOD Subareas**

Subarea Name

- Subarea E - TOD Low
- Subarea F - TOD Medium
- Subarea G - TOD High
- Subarea H - TOD Regional
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

Chapter 3 - TOD SUBAREAS

# EXHIBIT B.4

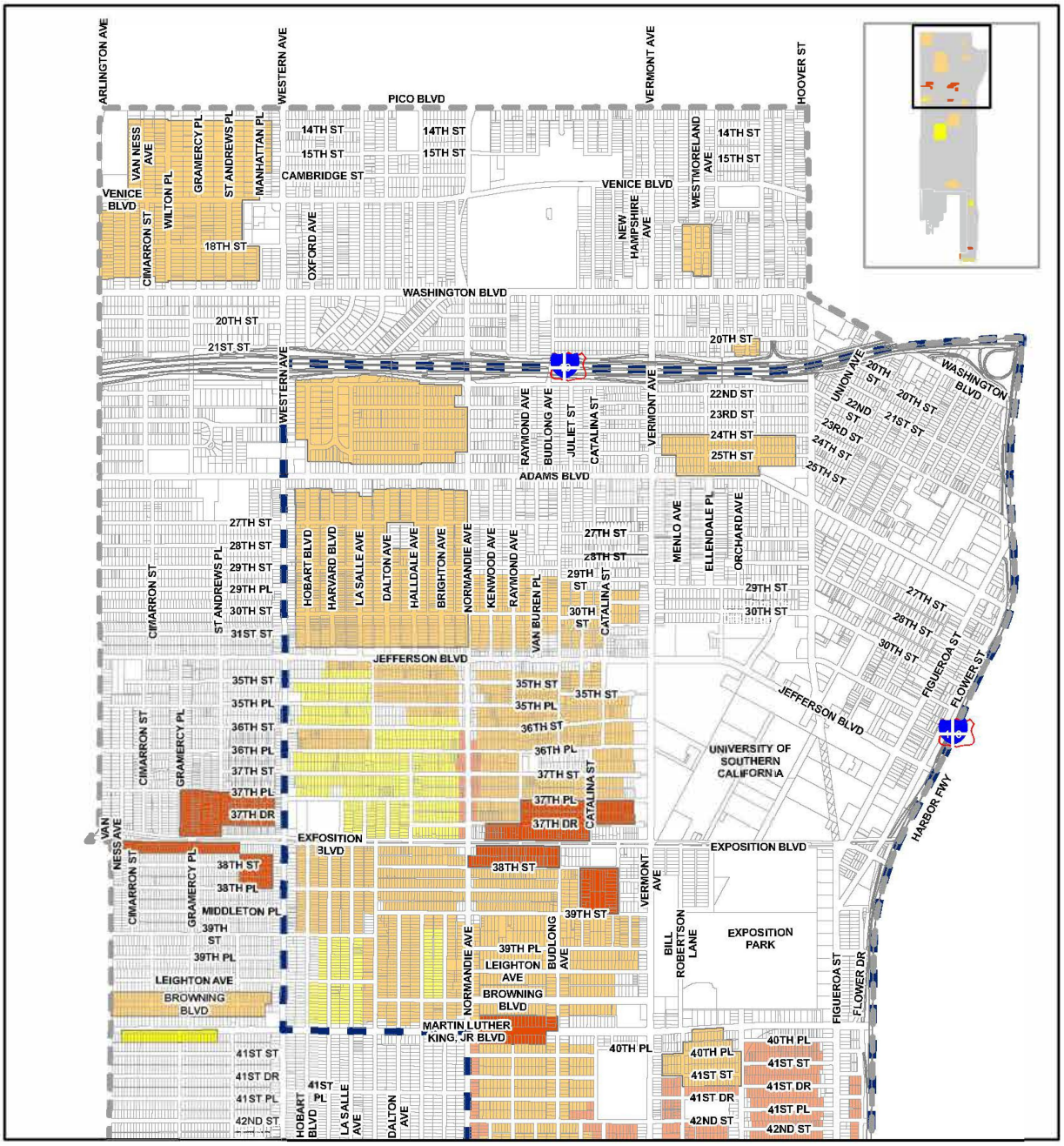



**Figure V-1, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea N - Multi-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

# EXHIBIT B.4

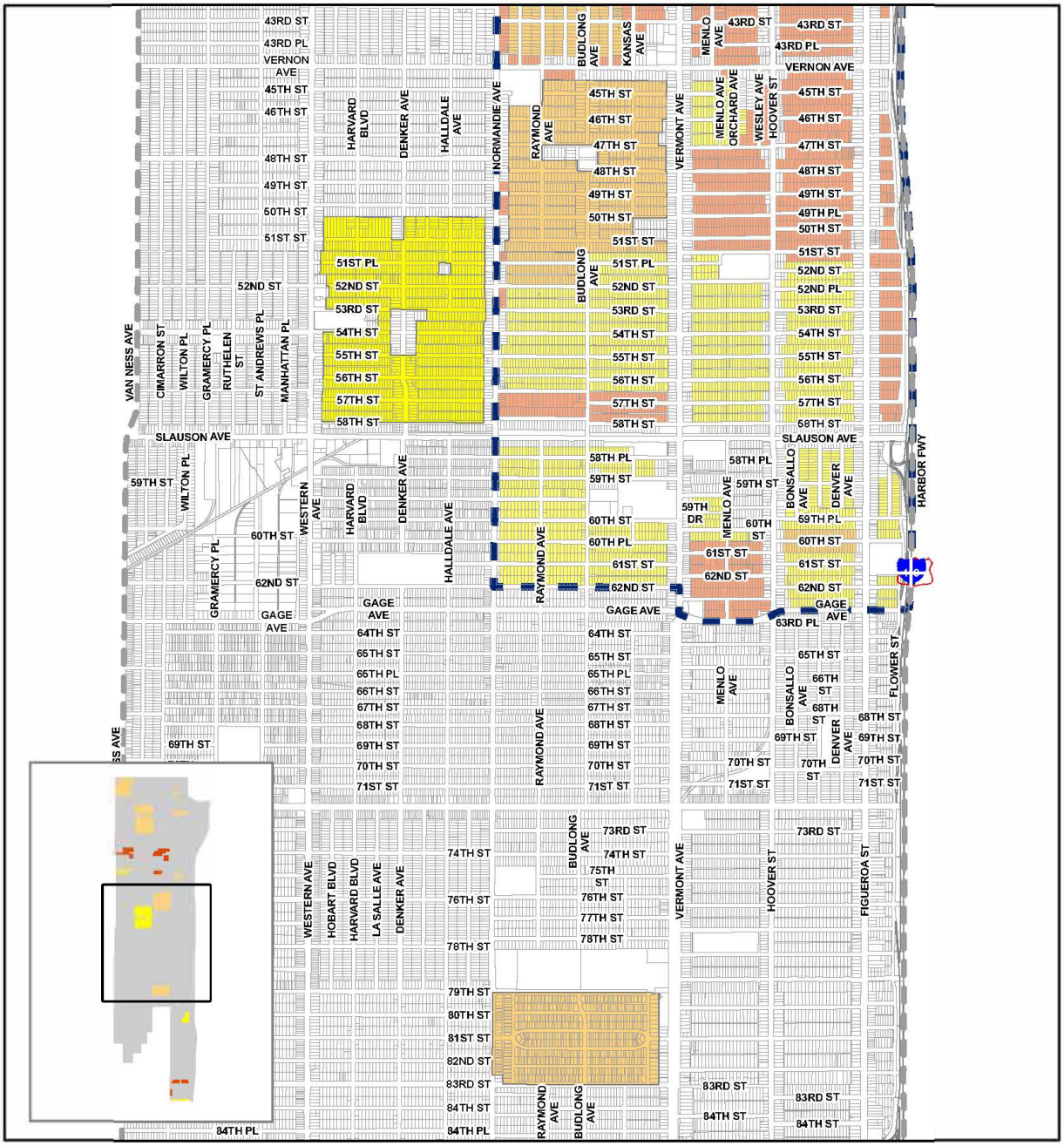



**Figure V-2, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

# EXHIBIT B.4

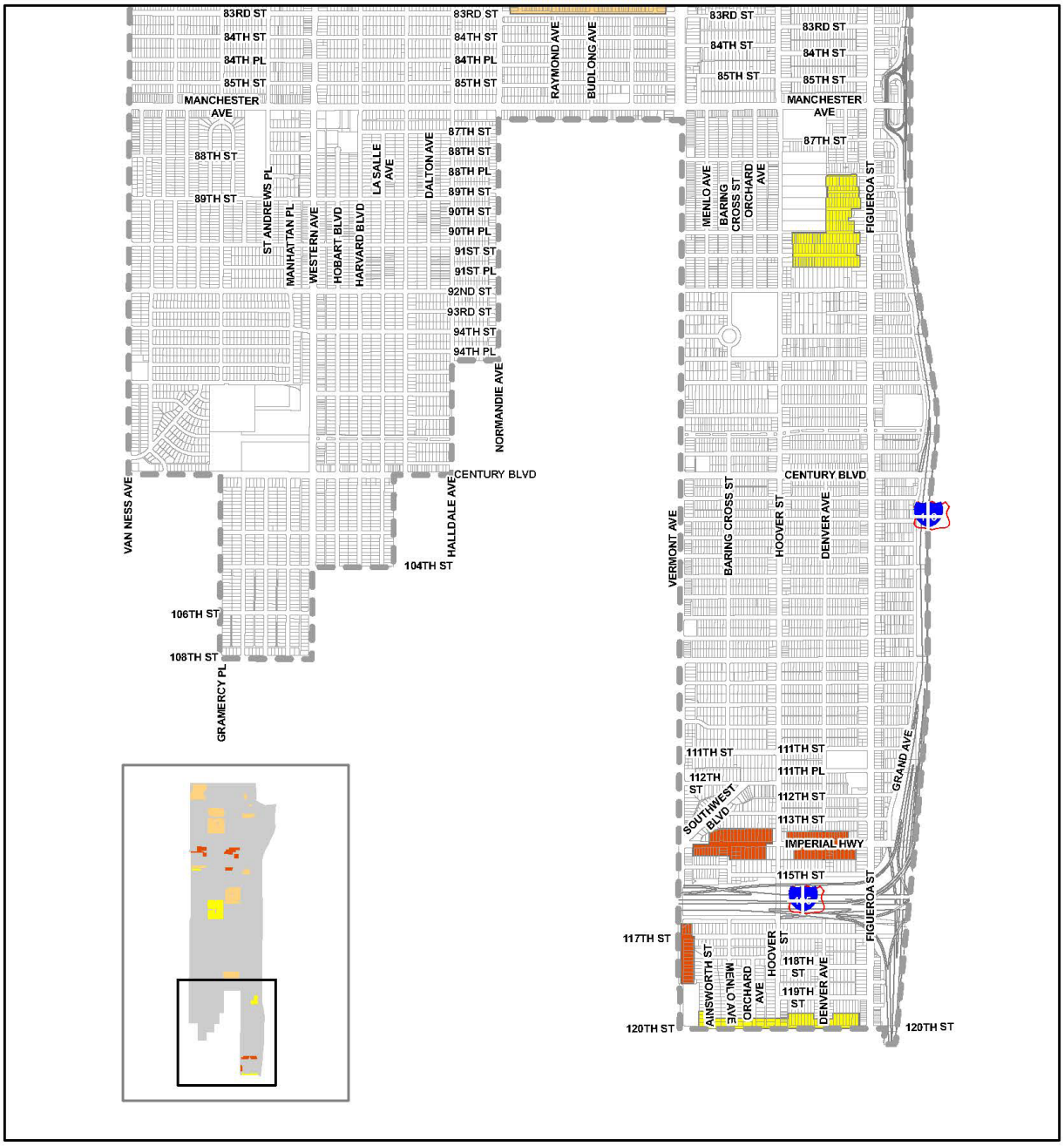



**Figure V-3, Residential Subareas**

- Subarea M - Legacy Single-Family
- Subarea N - Multi-Family
- Subarea O - Character Residential
- South Los Angeles CPA
- CPIO Protected Unit Area Boundary

N

0 0.25 0.5 1

Miles

Chapter 5 - RESIDENTIAL SUBAREAS

# EXHIBIT C.1:

# Draft Addendum to Certified EIR

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

# EXHIBIT C.1

# 2nd ADDENDUM

## SOUTH LOS ANGELES COMMUNITY PLAN IMPLEMENTATION OVERLAY DISTRICT ORDINANCE AMENDMENT PROJECT

## 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: 2008101098 (South Los Angeles)
2008101097 (Southeast Los Angeles)

---

**Project Location**: The South Los Angeles Community Plan Implementation Overlay (CPIO) District Ordinance Amendment Project Area is comprised of approximately 3,366.4 acres (5.26 square miles) located within the South Los Angeles Community Plan Area (CPA). The CPIO District Amendment Project Area is generally bounded by I-10 (Santa Monica freeway) to the north; the I-110 (Harbor freeway) to the east; Martin Luther King Jr. Boulevard (from Western Avenue to Normandie Avenue), West 62nd Street (from Normandie Avenue to Vermont Avenue) and Gage Avenue (from Vermont Avenue to the I-110 freeway) to the south; and Western Avenue (from the I-10 freeway to Martin Luther King Jr. Boulevard), Normandie Avenue (from Martin Luther King Jr. Boulevard to West 62nd Street), and Vermont Avenue (from West 62nd Street to Gage Avenue) to the west.

**Community Plan Area**: South Los Angeles

**Council District:** 8 – Harris-Dawson and 9 – Price and 1-Cedillo

**Project Description**: The South Los Angeles CPIO District Ordinance Amendment Project (Modified Project) amends the South Los Angeles CPIO District Ordinance to 1) add a Protected Unit Area applicable to Residential Subareas of the CPIO that incorporates existing state law residential development requirements as set forth by the Housing Crisis Act of 2019 (collectively, Senate Bill (SB) 330 and SB 8) and further strengthens dwelling unit replacement requirements; 2) expands Residential Subareas to include additional residential neighborhoods, thereby making them subject to the regulations set forth by the South Los Angeles CPIO including a demolition and permit delay provision for certain types of projects; and 3) amends Transit-Oriented Development (TOD) Subareas to shift designations for certain nodes within the South Los Angeles CPA. The Modified Project also includes a zone change to apply the R1R3 Rear Mass Variation (limiting the floor area ratio dependent on lot size) to two R1 zoned neighborhoods (36.02 acres total) within the South Los Angeles CPA, with no change to the general plan land use designation of Low II Residential.

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

**PREPARED BY:**
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3535 Hayden Avenue, Suite 350
Culver City, CA 90232

**November 2022**

# TABLE OF CONTENTS


Page

**1 INTRODUCTION ..... 1**
1.1 Background ..... 1
1.2 Purpose of this Addendum ..... 5
1.3 CEQA Requirements ..... 5
1.4 Revisions to the CEQA Guidelines ..... 7
1.5 Required Mitigation Measures ..... 10
1.6 Summary Comparison of Significant Impacts - Original Project Compared to Modified Project ..... 13
1.7 Summary of Effects ..... 15

**2 PROJECT DESCRIPTION ..... 16**
2.1 Project Location ..... 16
2.2 Original Project and Components ..... 19
2.3 Slauson TNP Project and Components ..... 20
2.4 Modified Project and Components ..... 21
2.5 Plan Implementation and Changes to Growth Forecast ..... 25

**3 ENVIRONMENTAL IMPACT ANALYSIS ..... 28**
3.1 Aesthetics ..... 30
3.2 Agriculture and Forestry Resources ..... 43
3.3 Air Quality ..... 46
3.4 Biological Resources ..... 57
3.5 Cultural Resources ..... 68
3.6 Energy ..... 75
3.7 Geology and Soils ..... 77
3.8 Greenhouse Gas Emissions ..... 93
3.9 Hazards and Hazardous Materials ..... 100
3.10 Hydrology and Water Quality ..... 116
3.11 Land Use and Planning ..... 134
3.12 Mineral Resources ..... 141
3.13 Noise ..... 143
3.14 Population and Housing ..... 154
3.15 Public Services ..... 163
3.16 Recreation ..... 177
3.17 Transportation ..... 182
3.18 Tribal Cultural Resources ..... 190
3.19 Utilities and Service Systems ..... 193
3.20 Mandatory Findings of Significance ..... 209

**4 CONCLUSION ..... 217**

## List of Figures

Figure 2-1 Regional Location ..... 17
Figure 2-2 Modified Residential and TOD Subarea Map ..... 18

## List of Tables

Table 1-1 2017 FEIR Mitigation Measures ..... 10
Table 1-2 Comparison of Unavoidable Significant Impacts - Original Project Compared to Modified Project ..... 14
Table 2-1 Housing Crisis Act and South Los Angeles CPIO Unit Replacement Requirements ..... 23
Table 2-2 R1R3 Development Standards (Additional Standards in LAMC Section 12.08) ..... 25
Table 2-3 Change in Growth – with Slauson Corridor TNP vs Original Project ..... 26
Table 3-1 Change in Growth – with Slauson Corridor TNP vs. Original Project ..... 156
Table 3-2 Change in Growth – Census vs. Original Project in South Los Angeles CPA ..... 159
Table 3-3 Change in Growth – 2020-2045 RTP/SCS vs. Original Project in South Los Angeles CPA ..... 159
Table 3-4 Solid Waste Facilities Serving the City of Los Angeles ..... 205

# 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) and certified the 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 Overlay (CPIO) District Ordinances) for the South Los Angeles and Southeast Los Angeles Community Plans. This document is an Addendum to the 2017 FEIR (SCH No. 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.

The proposed project is the South Los Angeles CPIO District Amendment Project (Modified Project) which includes proposed amendments to the South Los Angeles CPIO District Ordinance and the adoption of a minor zone change. The Modified Project amends the South Los Angeles CPIO District to add a Protected Unit Area, apply CPIO Residential subareas to additional residential neighborhoods and to modify Transit Oriented Development (TOD) Subareas intensities (mostly within the boundaries of the CPIO Protected Unit Area). The zone change includes the application of the R1R3 Rear Mass Variation Zone (tailoring design standards and floor area ratio dependent on lot size) to two neighborhoods (36.02 acres total) zoned R1 One-Family Residential (see Chapter 2, Project Description, for a more detailed description).

An Addendum to the 2017 FEIR was prepared in October 2022 to evaluate potential environmental effects that may be associated with the Slauson Corridor Transit Neighborhood Plan (Slauson Corridor TNP). The Slauson Corridor TNP amended the General Plan Land Use Map and the Zoning Map for the South Los Angeles and Southeast Los Angeles Community Plans area. These amendments included amendments to general plan land use designations, zone and height district changes, and changes to existing CPIO boundaries. The changes modified the allowable intensity, density, and/or types of uses on those properties and thus increased the capacity for housing and jobs in the South and Southeast Los Angeles Community Plan Areas (CPAs). The Slauson Corridor TNP Project also amended a small portion of the West Adams-Baldwin Hills-Leimert CPIO (West Adams CPIO) for areas of the West Adams CPIO area that are adjacent to the proposed Active Transportation Corridor which extends into the West Adams-Baldwin Hills-Leimert Community Plan Area and added programs to the West Adams-Baldwin Hills-Leimert Community Plan. The Slauson Corridor TNP Addendum demonstrated that the impacts associated with the Slauson Corridor TNP would be similar to or less than the impacts addressed in the 2017 FEIR. In this Addendum, the Original Project plus the Slauson Corridor TNP are referred to as the “Approved Plans”.

**CEQA Findings of Fact**

The 2017 Council approval included the Findings of Fact, pursuant to Public Resource Code (PRC) Section 21081 and State of California Environmental Quality Act (CEQA) Guidelines Section 15091. This document provided specific information regarding the significant environmental effects associated with the Original Project. 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 one-quarter 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 Original Project. 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 Original Project:

1. The Original Project promotes 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 Original Project directs 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 Original Project supports 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 Original Project enhance mobility by focusing future

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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.

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 Original Project would preserve the character of existing single-family and 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.

3. The Original Project 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 Original Project provides 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 Original Project 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 (AB) 32 and Senate Bill (SB) 375. The overall reduction in regional vehicle miles traveled and trip generation would contribute to lowered greenhouse gas emissions in the region.
4. The Original Project is consistent with SB 375. While potentially increasing vehicle miles traveled and greenhouse gases in the immediate area where new infill development will be focused, the Original Project 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 Original Project is consistent with the Sustainable Communities Strategy, and contribute to increasing mobility and sustainability. The Original Project 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 Original Project supports 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 Original Project. These benefits are not only consistent with the long-term vision of sustainable growth stipulated in the Framework but help ensure the continued economic viability of the commercial and industrial districts of the CPAs.
7. The Original Project would address incompatible land use patterns in the CPAs by minimizing industrial-residential conflicts and preserving stable industrial districts. The Original Project establishes 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 Original Project 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 Original Project 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 Original Project 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 Original Project would provide adequate capacity to allow an increase in the housing supply to address the housing shortage in the CPAs.
10. The Original Project would preserve the character of existing single-family and 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 Original Project 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 Original Project 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 AB 32 and SB 375.
13. The Original Project is consistent with Sustainable City pLAn by accommodating growth while providing transportation options. The Original Project 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 Original Project would be expected to contribute to decreasing regional vehicle miles traveled and greenhouse gas emissions in the region over time.
14. The Original Project improves local mobility through the development of a balanced, multi-modal transportation network, focusing new development near existing services and infrastructure. The Original Project emphasizes 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 reasonably 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, Sections 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 none of the following criteria are met for the Modified Project or otherwise:

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;
2) 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
3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified.

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 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 by 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 continue to 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 and Traffic. 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**

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 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 Original Project as well as the Slauson Corridor TNP. These mitigation measures were required as part of the approval process, incorporated into the CPIO, and are listed in **Table 1-1**. These mitigation measures will continue to be implemented as regulatory compliance measures as applicable and appropriate with respect to the Modified Project.

**TABLE 1-1: 2017 FEIR MITIGATION MEASURES**

| No. | Mitigation Measure |
|---|---|
| **AIR QUALITY** | |
| **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:<br>• Restrict idling of construction equipment[3] and on-road heavy duty trucks[4] to a maximum of 5 minutes when not in use.<br>• 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.<br>• Use heavy duty diesel-fueled equipment that uses low $NO_X$ diesel fuel to the extent it is readily available and feasible.<br>• 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.<br>• 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 NOx:<br>o PM – 0.01 g/bhp-hr<br>o NOx – at least 1.2 g/bhp-hr<br>• Use zero-emission trucks and equipment where available, or cleanest available technology. |

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: 2017 FEIR MITIGATION MEASURES | |
|---|---|
| **No.** | **Mitigation Measure** |
| | • Every effort should be made by the Contractor to utilize grid-based electric power at any construction site, where feasible.<br>• 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.<br>• Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.<br>• Construction contractors shall use pre-painted construction materials, as feasible.<br>• Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.<br>• Prepare haul routes, when required by the LAMC that conform to local requirements to minimize traversing through congested streets or near sensitive receptor areas.<br>• Maintain a buffer zone that is a minimum of 1,000 feet between truck traffic and sensitive receptors, where feasible.<br>• When required by LADOT, upgrade signal synchronization to improve traffic flow.<br>• Configure construction parking to minimize traffic interference.<br>• When required by LADOT, provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.<br>• Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable.<br>• Traffic speeds on all unpaved roads shall be 15 mph or less.<br>• Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.<br>• 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 $PM_{10}$ 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.<br>• 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.<br>• Implement the fugitive dust control measures as required in the South Coast Air Quality Management District's Rule 403 Fugitive Dust.<br>• Require installation of high efficiency filtration systems (MERV 13) for housing projects within 500 feet of freeways and oil drilling sites. |
| **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 |

| TABLE 1-1: 2017 FEIR MITIGATION MEASURES | |
|---|---|
| **No.** | **Mitigation Measure** |
| | 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** | 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.<br><br>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.<br><br>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.<br><br>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 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** | 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:<br><br>• 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.<br>• The construction contractor shall locate construction staging areas away from sensitive uses.<br><br>• 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.<br>• 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.<br>• Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.<br>• The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.<br>• Use electric or solar generators, when available. |

| TABLE 1-1: 2017 FEIR MITIGATION MEASURES | |
|---|---|
| **No.** | **Mitigation Measure** |
| **N2** | The following conditions shall apply to future development within the CPIO Subareas (except Residential Subareas M, N, and O):<br>• Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block line-of-sight to sensitive receptors.<br>• Mechanical equipment (e.g., heating, ventilation and air conditioning (HVAC) Systems) shall be enclosed with sound buffering materials.<br>• 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.<br>• 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** | 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:<br>• Historic buildings adjacent to the project's construction zones are identified.<br>• A Vibration Control Plan is prepared and approved by the City.<br>• The Vibration Control Plan shall be completed by a qualified structural engineer.<br>• 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.<br>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:<br>• 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.<br>• The construction activities shall involve rubber-tired equipment rather than metal-tracked equipment.<br>• 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 - ORIGINAL PROJECT 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 Original Project 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 ORIGINAL PROJECT COMPARED TO MODIFIED PROJECT | | |
|---|---|---|
| **Issue Area** | **Original Project** | **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 Original Project 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 103rd Street), and other identified locations in the Southeast Los Angeles CPA. | Less Severe. Shade and Shadow would be similar to that analyzed in the 2017 FEIR. 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 Original Project 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, as a conservative assessment it was concluded that the Original Project would result in a significant and unavoidable impact related to historical resources and would be cumulatively considerable. | Same. Impacts related to historical resources would continue to be significant and unavoidable. |
| **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 Original Project 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 Original Project 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 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 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.

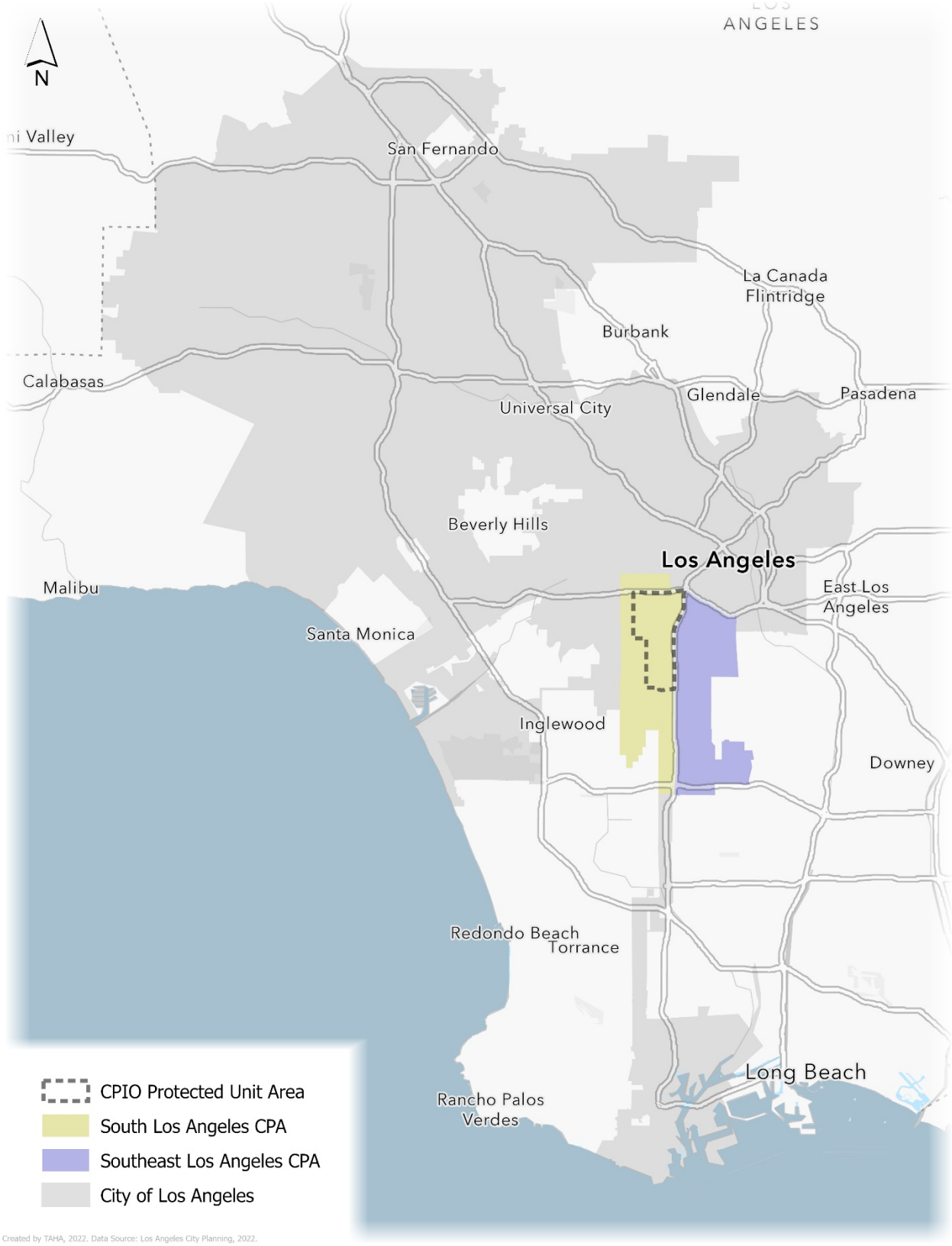
## 2.1 PROJECT LOCATION

The South Los Angeles and Southeast Los Angeles CPAs are located southwest and south of Downtown Los Angeles. The CPAs that comprise the Original Project are geographically contiguous, sharing a common boundary along the Harbor freeway (I-110) and Van Ness Avenue. Combined, the South Los Angeles and Southeast Los Angeles CPAs cover over 30 square miles. 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 freeway 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.

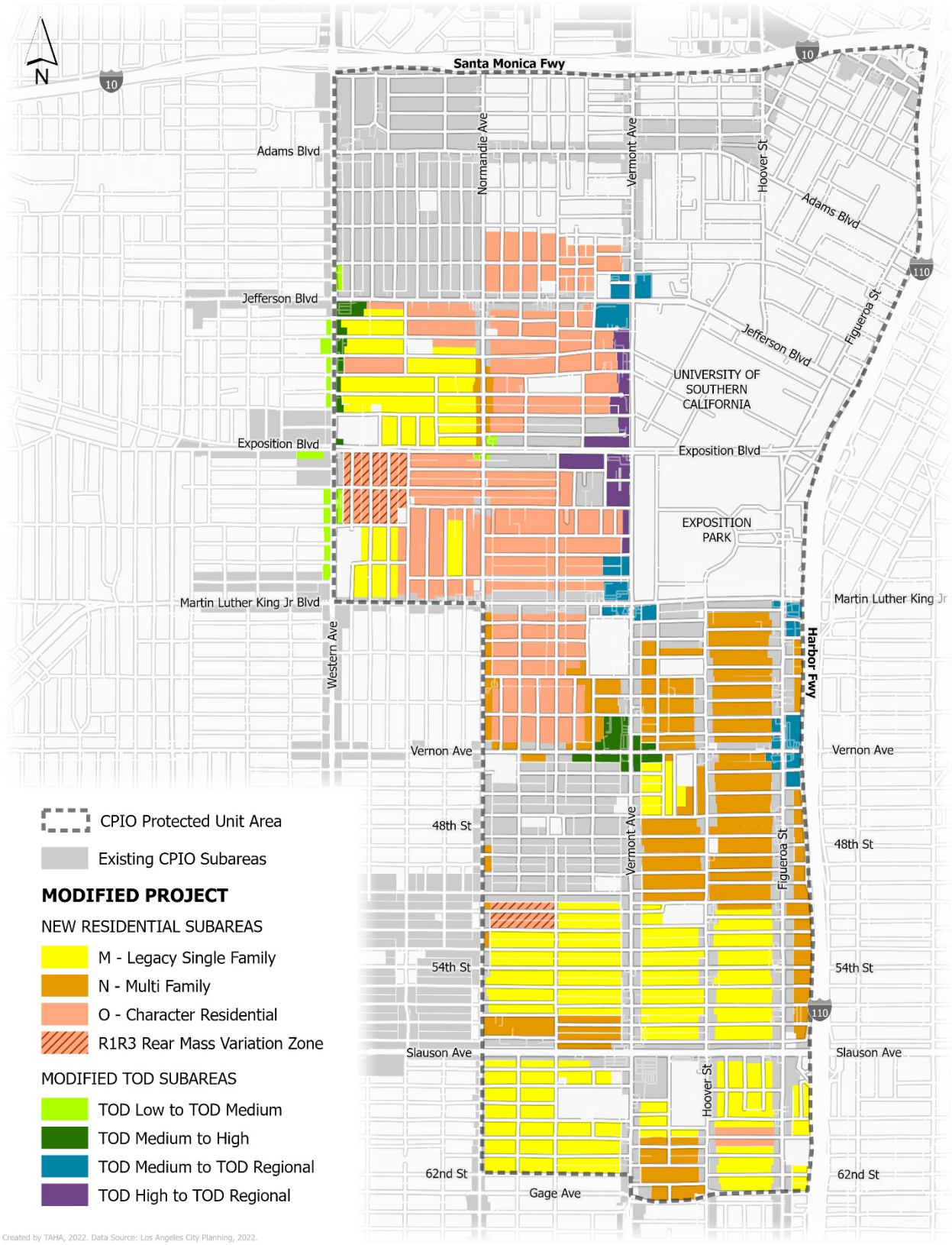
The Modified Project would amend the text and figures of the South Los Angeles CPIO District. The Protected Unit Area would apply to approximately a 3,366.4 acres area (5.26 square miles) located completely within the South Los Angeles CPA. The South Los Angeles CPIO District Amendment Project Area is generally bounded by the I-10 freeway to the north; the I-110 freeway) to the east; Martin Luther King Jr. Boulevard (from Western Avenue to Normandie Avenue), West 62nd Street (from Normandie Avenue to Vermont Avenue) and Gage Avenue (from Vermont Avenue to the I-110 freeway) to the south; and Western Avenue (from the I-10 freeway to Martin Luther King Jr. Boulevard), Normandie Avenue (from Martin Luther King Jr. Boulevard to West 62nd Street.), and Vermont Avenue (from West 62nd Street to Gage Avenue) to the west. The regional location is shown in **Figure 2-1**.

Within the South Los Angeles CPIO District boundaries, the Modified Project would designate a CPIO Protected Unit Area where CPIO Residential Subarea regulations would be added and levels of TOD designation would be modified (see discussion below). These more substantive changes would generally apply to approximately 2,112 acres (3.3 square miles, see **Figure 2-2**). These areas are generally bounded by West Jefferson Boulevard (from Western Avenue to Normandie Avenue) and West 29th Street (from Normandie Avenue to Vermont Avenue. to the north; Vermont Avenue (from West 29th Street to Martin Luther King Jr. Boulevard) and the I-110 freeway (from Martin Luther King Jr. Boulevard to West Gage Avenue) to the east; West 62nd Street (from Normandie Avenue to Vermont Avenue) and Gage Avenue (from Vermont Avenue to the I-110 freeway) to the south; and Normandie Avenue (from West 29th St to Jefferson Boulevard), Western Avenue (from Jefferson Boulevard to Martin Luther King Jr. Boulevard), and Normandie Avenue (from Martin Luther King Jr. Boulevard to West 62nd Street) and Vermont Avenue (from West 62nd Street to West Gage Avenue).

**Figure 2-1: Regional Location**



## Figure 2-2: Modified Residential and TOD Subarea Map



## 2.2 ORIGINAL PROJECT AND COMPONENTS

The Original Project 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 applicable community plan, including changes for certain portions of the CPAs to allow specific uses, development standards (including height, Floor Area Ratio, and massing) and design standards. These zoning ordinances involved a number of different legislative actions, including amendments to the Zoning Map for zone and height district changes under the Los Angeles Municipal Code (LAMC) Section 12.32 and the establishment of two CPIO Districts (one for each respective CPA) under LAMC Section 13.14. Also, to ensure consistency between the updated community plans and 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.

**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 Subareas also known as change areas in the Original Project. 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 are zoned 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 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 LAMC Section 11.5.11.

*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 SLAUSON TNP PROJECT AND COMPONENTS

An Addendum to the 2017 FEIR was prepared to evaluate potential environmental effects associated with implementation of the Slauson Corridor TNP. The Slauson Corridor TNP Addendum found that impacts associated with implementation of the Slauson Corridor TNP would be similar to or less than the impacts addressed in the 2017 FEIR.

The Slauson Corridor TNP amends the General Plan Land Use Map and the Zoning Map for the South Los Angeles and Southeast Los Angeles CPAs. The amendments include amendments to the general plan land use designations, zone and height district changes, and changes to existing CPIO boundaries. These changes 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 Slauson TNP also amends 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.

## 2.4 MODIFIED PROJECT AND COMPONENTS

The Modified Project further implements the policy vision of the Original Project with the intent to strengthen residential neighborhood stability and compatible development and to promote the preservation of affordable housing within an area identified as a CPIO Protected Unit Area. The Modified Project includes amendments to the South Los Angeles CPIO District Ordinance as follows:

1. Expand the CPIO's Residential Subareas to include additional residential neighborhoods within the South Los Angeles CPA, thereby making them subject to the supplemental development regulations as set forth by the South Los Angeles CPIO.

2. Amend the CPIO's Residential Subarea Chapter to include a new Applicability section containing Los Angeles Housing Department (LAHD) procedures to incorporate existing state law residential development requirements regarding replacement of units as set forth by the Housing Crisis Act of 2019 (collectively, SB 330 and SB 8). These CPIO amendments would further enhance the state replacement and tenant protection requirements. A demolition and permit delay provision for certain types of projects is also included as part of the amendments proposed.

3. Amend the CPIO's TOD Subareas to shift the levels of TOD Subarea designations for certain nodes within the South Los Angeles CPA (as shown in **Figure 2-2**, a few parcels where TOD Low is shifted to TOD Medium lie slightly west of the CPIO Protected Unit Area boundary south of Jefferson Boulevard to Martin Luther King Jr. Boulevard).

4. Apply the Rear-Mass Variation R1R3 zone change (e.g., tailoring design standards and floor area ratio dependent on lot size), to two R1 zoned neighborhoods (see **Figure 2-2**) within the South Los Angeles CPA, with no change to the General Plan Land Use Designation of Low II Residential.

The components above are collectively the Modified Project and are described further below.

**South Los Angeles CPIO District Amendments**

*New Residential Subareas*

The Modified Project expands the existing boundaries of the Residential Subareas to include additional residential neighborhoods as delineated in **Figure 2-2**.

The Residential Subareas are comprised of three Subareas: Legacy Single-Family (Type M), Multi-Family Residential (Type N), and Character Residential (Type O). Adding neighborhoods to CPIO Residential Subareas would not change the General Plan Land Use Designation, underlying Zones or Height Districts. According to the CPIO:

*The Residential Subarea Types M, N and O encourage well-designed projects that are compatible with the surrounding neighborhood scale and character…. The intent of these supplemental development regulations … is to strengthen residential neighborhood stability and guide new infill residential development to be consistent with prevailing neighborhood character. For all Residential Subarea types, Projects must meet basic design standards for front façades, front yards, roof forms, and building materials.*

Each subarea has detailed provisions that restrict building development within each area (including building heights, density, FAR, massing, setbacks, parking, and design). The following additions in area to each residential subarea would be made as part of the Modified Project:

- The Legacy Single-Family Subarea (Type M) will be applied to an additional approximately 388.38 acres (the parking standard [subsection V-2 C3(a)(iii)] would be revised for the Legacy Single Family Subareas within the Modified Project Area). The Legacy Single-Family Subarea preserves the single-family character of R2 zoned lower density neighborhoods. Development standards ensure that building mass and setbacks keep new development projects in balance with the existing environment.
- The Multi-Family Subarea (Type N) will be applied to an additional approximately 247.22 acres. Development standards within this Subarea address design considerations for RD and R3 zoned higher density neighborhoods in order to ensure that new development projects are well designed and represent an improvement for their respective neighborhoods.
- The Character Residential Subarea (Type O) will be applied to an additional approximately 346.55 acres. Development standards within this Subarea can be applied across R1, R2, RD and R3 residential densities and guide the ongoing maintenance of structures, and regulations ensure that new development projects complement the surrounding context, including protecting patterns of historic parcelization. Eligible historic resources are subject to an additional level of review.

Additions of areas to each subarea would place limitations on development, without incentivizing displacement, thus resulting in generally fewer impacts as a result of less development overall and better design.

*LAHD Procedures*

The Modified Project adds a new section to the CPIO's Chapter V Residential Subareas. The new section will consist of new applicability regulations including an additional step in the review process for projects within the CPIO Protected Unit Area which will require a determination from the LAHD prior to the issuance of a building permit. The LAHD determination incorporates existing state law residential development requirements set forth by the Housing Crisis Act of 2019 which requires certain residential development projects to: 1) achieve no net loss in residential units; 2) replace certain types of "protected" residential units; and, 3) provide certain occupant protections. The Modified Project will further enhance replacement requirements by setting some requirements above the state level requirements.

Existing replacement requirements per the Housing Crisis Act require residential development to achieve "not net loss" meaning residential projects must replace at least the same number of units existing on a site prior to development. Certain units are deemed protected (Protected Units) and include those which are (1) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; (2) subject to any form of rent or price control through a public entity's valid exercise of its police power within the five past years; (3) rented by extremely low, very low, or low income households; or (4) withdrawn from rent or lease per the Ellis Act, within the past 10 years. Under existing law, Protected Units are treated to a higher

standard of replacement to preserve existing affordable housing. State law currently requires that replacement units match the number of bedrooms. The Modified Project requires replacement of Protected Units also match at least the same floor area as the Protected Unit it is replacing. In the absence of floor area documentation, the Modified Project proposes to increase the state standard by setting default replacement requirements in terms of floor area. The default floor area would be required to be at least the average unit size of a comparable Protected Unit within the Modified Project area.

Similarly, existing replacement requirements per the Housing Crisis Act require that the replacement of Protected Units also match the affordability level of the unit it is replacing based on occupant income documentation. In the absence of occupant documentation, the state standard defaults to the percentage of extremely low, very low, or low-income renters within the City as determined by the latest U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) database. The Modified Project proposes to increase the state standard by setting the default to the Extremely Low-Income Level acknowledging that the median household income in the South Los Angeles CPA is currently $38,295, compared to the citywide household income of $62,142 (American Community Survey 2015-2019). **Table 2-1** summarizes the differences between the state replacement requirements and the replacement requirements proposed for the South Los Angeles CPIO Ordinance. The Housing Crisis Act is set to expire January 1, 2034, while the Modified Project provisions are proposed to become a permanent regulation for this geography.

**TABLE 2-1: HOUSING CRISIS ACT AND SOUTH LOS ANGELES CPIO UNIT REPLACEMENT REQUIREMENTS**

| | State Requirements | CPIO Requirements |
|---|---|---|
| **No Net Loss** | Residential projects must replace at least the same number of units existing on a site prior to development | Residential projects must replace at least the same number of units existing on a site prior to development. (No change) |
| **Replacement of Protected Units - Size** | Must be replaced with a unit that has comparable number of bedrooms | Must be replaced with a unit that has comparable number of bedrooms and bathrooms and at least comparable floor area, if no floor area documentation is available, then default to comparable protected unit size. |
| **Replacement of Protected Units - Affordability Level** | Must be replaced with a unit that has comparable rent, if no income documentation available, then default to the jurisdiction's affordability levels | Must be replaced with a unit that has comparable rent, if no income documentation available, then default to Extremely Low Income Levels. |

*Additional Residential Subarea Standards*.

A demolition and permit delay provision for certain types of projects within the CPIO Protected Unit Area is also included as part of the amendments; no demolition permits will be issued for projects where an existing structure is more than 45 years old until a new project has been approved for the same site. The intent of this provision is to help address neighborhood stability through early displacement avoidance and provide some degree of protection for eligible historic resources.

*TOD Subarea Shifts in Designations*

The Modified Project also makes changes to certain existing TOD Low, TOD Medium and TOD High Subarea designations as delineated in **Figure 2-2**. These changes would allow for increases in intensity as lower TOD designations are shifted to higher TOD designations. However, making intensity changes within existing TOD Subareas does not constitute a change to the general plan land use designation, underlying zones or height districts and does not change the assumptions regarding forecast growth (see discussion below in Section 2.5, Plan Implementation and Changes to Growth Forecast).

The TOD Subareas are composed of four Subareas: TOD Low, TOD Medium, TOD High, and TOD Regional. TOD Subareas are located in close proximity to Metro light rail stations and major bus intersections. The Community Commercial land use designation and height district 2D is applied to all TOD Subareas. The TOD Low Subarea is characterized by lower intensity development that compliments the surrounding low density and low scale residential neighborhoods and offers modest incentives for projects that include affordable housing. The TOD Medium Subarea offers moderate incentives for projects that include affordable housing, while the TOD High Subarea offers incentives greater than those offered in the TOD Medium subarea. The TOD Regional Subarea allows for the highest intensity under the height district 2 zoning designation for commercial and mixed-use developments that provide greater housing and employment opportunities and offers the greatest incentives for projects that include affordable housing. TOD Regional is currently not applied to the South Los Angeles CPA but will be applied as part of the Modified Project. The Modified Project includes the following shifts in designations:

- 11.32 acres designated as TOD Low (up to 4 stories/60 feet, FAR up to 3:1) will be amended to TOD Medium (up to 5 stories 75 feet, FAR up to 3.5:1).
- 23.75 acres designated as TOD Medium will be amended to TOD High (up to 8 stories/120 feet, FAR up to 4:1).
- 35.20 acres designated as TOD Medium will be amended to TOD Regional (up to 15 stories/225 feet, FAR up to 6:1).
- 26.67 acres designated as TOD High will be amended to TOD Regional.

**R1R3 Rear Mass Variation Zone**

The Modified Project includes a zone change ordinance that would apply the R1R3 Rear Mass Variation Zone to approximately 36.02 acres (approximately 297 parcels) within the South Los Angeles CPA that are currently zoned for R1 One-Family Residential (see **Figure 2-2**). This modification does not constitute a change to the underlying R1 zoning or Low II Residential General Plan Land Use Designation. These changes do not increase the allowed density beyond what would otherwise be allowed under the R1 zone. Application of the R1R3 Variation Zone provides more tailored supplemental development regulations to new single-family development and additions to existing single-family dwellings than the standard R1 zone with the intent of ensuring compatibility with the existing built environment and preserving neighborhood character consistent with state law. The CPIO Character Residential Subarea would also be applied to these areas, as stated in the Residential Subareas section above.

Adopted in 2017 (Ordinance No. 184,802), there are 16 R1 Variation Zones with four form categories and four scale categories that can be combined to create the appropriate R1 Variation Zone for a neighborhood. The four form options are front mass, rear mass, variable mass and hillside, each with tailored development regulations focused on existing single-family neighborhood building patterns and building forms including bulk placement limitations, lot coverage maximums, encroachment plane heights, as well as height and residential floor area regulations.

The R1R Rear-Mass Variation includes four zones (R1R1, R1R2, R1R3, and R1R4). The R1R3 combination would be applied to two R1 zoned neighborhoods within the South Los Angeles CPA. The location of these two neighborhoods is generally 1) near the intersections of Western Avenue and Exposition Boulevard, and 2) Normandie Avenue and 51$^{st}$ Street (see **Figure 2-2**). The lots within these two neighborhoods are mostly developed with existing single-family residential uses that are limited to single-story and two-story buildings and in some areas detached garages located in the rear of the property. **Table 2-2** lists the residential floor area changes to R1R3 zoned lots as compared to their existing R1 zone.

| TABLE 2-2: R1R3 DEVELOPMENT STANDARDS (ADDITIONAL STANDARDS IN LAMC SECTION 12.08) | | | |
|---|---|---|---|
| **Lot Size** | **R1 FAR** | **R1R3 FAR** | **% of Zone Change Area** |
| Up to 6,000 SF | 0.45 | 0.45 | 89.7% (280 parcels-32.30 acres) |
| 6,001 to 7,000 SF | | 0.43 | 3.5% (9 parcels-1.26 acres) |
| 7,001 to 8,000 SF | | 0.41 | 0% (0 parcels-0 acres) |
| 8,001 to 9,000 SF | | 0.39 | 2.7% (4 parcels-.97 acres) |
| 9,001 to 10,000 SF | | 0.37 | 0% (0 parcels-0 acres) |
| Over 10,000 SF | | 0.35 | 4.2% (4 parcels-1.5 acres) |

## 2.5 PLAN IMPLEMENTATION AND CHANGES TO GROWTH FORECAST

As a result of the Slauson Corridor TNP (mentioned above and discussed further below) the forecast growth in the South Community Plan Area (and Southeast Community Plan) was incrementally adjusted to reflect the Slauson Corridor TNP. See **Table 2-3** below.

As noted in the Slauson Corridor TNP Addendum, 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. In addition, 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 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). Based on these recent data the Department of City Planning believes that the employment forecasts in the 2017 FEIR that were further refined in the Slauson Corridor TNP Addendum (see **Table 2-3** below) 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.

Now with respect to the currently proposed components of the Modified Project, the Modified Project would not substantially change development assumptions included in the 2017 FEIR, as adjusted in the Slauson TNP Addendum. The Modified Project impacts the growth forecast as follows:

- Expansion of the Residential Subareas would add measures to protect these neighborhoods, but these protections, while constraining building envelopes would not affect the number of units. To address the potential loss in floor area as a result of these protections, additional area is added to the TOD areas so that no net loss occurs (see below).
- Incorporation of residential development requirements exceeding state law regarding replacement of units (SB 330 and SB 8) would not only require replacement of the same number of units but require that the units match the same floor area or use default replacement requirements in terms of floor area which would not affect growth assumptions.
- The R1R3 Rear Mass Variation would limit building areas depending on lots size in a small area but is not expected to change growth assumptions as previously analyzed.

| TABLE 2-3: CHANGE IN GROWTH – WITH SLAUSON CORRIDOR TNP VS ORIGINAL PROJECT | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | **EIR Existing Conditions** | **Original Project 2035*** | **With Slauson Corridor TNP 2035**** | **Original Project vs. Existing** | **With Slauson Corridor TNP vs. Existing** | **Original Project Percentage Change vs. Existing** | **With Slauson Corridor TNP Percentage Change vs. Existing** | **Percentage Point Change With Slauson Corridor TNP vs. Original Project** |
| **SOUTH LOS ANGELES CPA** | | | | | | | | |
| Population (persons) | 270,354 | 313,836 | 316,628 | 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 | 80,467 | 80,931 | 11,836 | 12,280 | 17.2% | 17.9% | 0.6 |
| Employment (jobs) | 74,694 | 95,955 | 101,618 | 20,961 | 26,924 | 28.1% | 36.0% | 8.0 |

* Reasonably anticipated growth from 2017 FEIR.
** Reasonably anticipated growth estimated by City Planning using the same methodology as used in the 2017 FEIR.
NOTE: The Modified Project would not change the growth forecast as presented above and in Table 2-4 of the Slauson TNP Addendum.
**SOURCE**: City of Los Angeles, Department of City Planning; 2016, 2022

- The changes in levels of TOD designation would generally increase development potential, but this expected increase is not beyond what was evaluated in the 2017 FEIR, and as further analyzed in the Slauson TNP Addendum. While the 2017 FEIR and Slauson TNP Addendum did not evaluate the different TOD designations separately, the TOD subareas were evaluated based on land use designations using the Community Commercial General Plan Land Use designation, anticipating that there could be some changes in the different levels of TOD designation. Rather the EIR evaluated Active Change areas at double the density allowed by underlying zoning — these areas are identified as AC-2D in the 2017 FEIR. All of the TOD areas were evaluated as "AC-2D". Therefore, the anticipated growth that was evaluated as "Reasonably Anticipated Development" remains within the limits of the proposed shifts in TOD designation levels under the Modified Project.

SB 8, SB 9 and SB 10 Overview

On September 16, 2021, Governor Gavin Newson signed three legislative bills intended to expand housing production (SB 8), streamline zoning processes for single-family residential two-unit lot split projects (SB 9), and increase residential density near transit (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 (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, 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 Junior Accessory Dwelling Units (JADUs) on lots that use the Urban Lot Split or 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 under Section 2.4 below), the growth assumptions evaluated in the 2017 FEIR and refined in the Slauson Corridor TNP Addendum, 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.

Based on the above, the Modified Project is not anticipated to change growth assumptions for population, employment and housing set forth in the 2017 FEIR, and as incrementally adjusted by the Slauson TNP Addendum. However, the Modified Project may reduce the potential building envelope, affect certain yard setback requirements, supplemental development regulations, for projects in the newly expanded CPIO Residential Subareas.

# 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.

The standard Appendix G Environmental Checklist Form combined with CEQA criteria to determine the appropriate level of environmental review was used to compare the anticipated environmental effects of the Modified Project with those identified in the 2017 FEIR and 1st Addendum addressing the Slauson Corridor TNP. The checklist addresses whether any of the conditions set forth in CEQA Guidelines Section 15162 and PRC Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered. The checklist and associated evaluations provide the following information for each environmental impact category:

**A. Impact Determination in the Certified EIR and 1st Addendum.** This section summarizes the impact determination made in the 2017 FEIR and Slauson Corridor TNP Addendum 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 FEIR, any relevant analysis and impact conclusion from the 2017 FEIR 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 FEIR (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 and 1st Addendum, 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 and 1st Addendum 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 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 and 1st Addendum Was Approved?** 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 Certified EIR. 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 PRC 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 Original Project remains relevant to the revised 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

### *2017 FEIR*

As shown in Figure 4.1-1 of the 2017 FEIR, in the Original Project, the majority of the South and Southeast Los Angeles CPAs are considered TPAs. Future development under the Original Project was 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 Original Project did not 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 Original Project allowed 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 Original Project ranged 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 remained either three stories/45 feet or limited by a 1.5:1 FAR which effectively limits feasible heights to approximately 45 feet. As such, future development is

generally not anticipated to exceed three stories in the ACs and Non-Change Areas of the CPAs. However, it is reasonably anticipated that individual projects may seek approval for taller structures which would require separate environmental clearance. The location of such projects would be speculative to identify in advance.

While the Original Project 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 Original Project was not expected to result in significant impacts to scenic vistas. Future development under the Original Project was expected to occur primarily within the TPAs. Any development that would occur under the Original Project 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 Original Project were determined to be *less than significant.*

Mitigation Measures. No mitigation measures were required.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP proposed an incremental increase in the allowable intensity, density, and/or type of land uses in the Project Area beyond what was evaluated in the 2017 FEIR. However, none of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. Impacts related to scenic vistas as a result of the Slauson Corridor TNP were determined to be *less than significant.* No mitigation measures were required under the 2017 FEIR and no new mitigation measures were warranted.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change and are within the scope of impacts previously analyzed. As with the Original Project, these changes would

not obstruct the viewsheds of any 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 related to scenic vistas beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to scenic vistas beyond what was previously analyzed in the 2017 FEIR and Slauson TNP Addendum.

### 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 Modified Project involves new significant impacts or substantially more severe impacts related to scenic vistas beyond what was previously analyzed in the 2017 FEIR and Slauson TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or the Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

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 scenic highway features a wide landscaped median with matures 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 Original Project 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 Original Project did not alter the existing street alignments, future development under the Original Project was 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.[5] 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 Original Project.

Conclusion. There are no state scenic highways within the CPAs, or in proximity to the CPAs, and future development occurring under the Original Project would not result in the substantial damage of a scenic resource. Therefore, the Original Project was determined to result in *no impact* related to scenic resources with no mitigation measures required.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP was found to result in the same impacts as the Original Project and did not result in new significant impacts or substantially more severe impacts regarding scenic resources beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. Therefore, the Slauson Corridor TNP was found to continue to result in *no impact* related to scenic resources with no mitigation measures required under the 2017 FEIR and no new mitigation measures were warranted.

5 City of Los Angeles. NavigateLA, http://navigatela.lacity.org/index01.cfm, accessed September 10, 2014.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as defined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. These changes do not constitute a change to the General Plan Land Use Designation, underlying Zones or Height Districts. In addition, the Modified Project would continue to comply with the City of Los Angeles Tree Preservation Ordinance policies or procedures. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; *no impact* would occur.

### 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 circumstances under which the Modified Project is undertaken that would require major revisions to the 2017 FEIR due to the involvement of result in new or substantially more severe significant impacts to scenic resources in state scenic highway beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project was expected to occur principally within the TPAs. The following analysis is 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 Original Project was anticipated to 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, a significant change to the visual character in Non-Change Areas was not foreseeable as a result of the Original Project.

The Active Change Areas are located primarily within the proposed TOD Subareas of the CPIO Districts. The Original Project was anticipated to 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 and heights) 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 Original Project. 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 corridors and TODs is required to comply with mandatory CPIO regulations which seek to implement the goals and policies of the Original Project specific to the visual character and quality of commercial areas. The policies of the Original Project 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 CPIO's 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 Original Project included 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 Original Project and those that do occur are expected to be beneficial. Based on this, the Original Project would

not substantially degrade the existing visual character and quality of the CPAs and their surroundings, and impacts related to visual character would be *less than significant*.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As discussed in the Slauson Corridor TNP Addendum, the changes proposed under the Slauson Corridor TNP were determined to improve land use consistency with applicable plans and be compatible with the visual character of the CPAs. The Slauson Corridor TNP was determined to not result in new significant impacts or substantially more severe impacts regarding visual character beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. These changes do not constitute a change to the General Plan Land Use Designation, underlying Zones or Height Districts. As with the Original Project and Slauson Corridor TNP Addendum, all development under the Modified Project would comply with mandatory City development regulations and design standards and would be overall compatible with the existing urban uses that set the aesthetic character of the CPIO. The Modified Project would not substantially degrade the existing visual character or quality of the CPIO. 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 visual character beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to visual character beyond what was previously analyzed in the 2017 FEIR and Slauson TNP Addendum.

**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 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 visual character beyond what was previously analyzed 2017 FEIR and Slauson TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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[6] | No | No | No | No |

## A. Impact Determination in the Certified EIR

### *2017 FEIR*

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 Original Project was expected to occur principally within the TPAs and involve residential, mixed use or employment center development. The 2017 FEIR analyzed impacts for those limited areas 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 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 Original Project promotes 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 Original Project, 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 Original Project was anticipated to result in additional sources of nighttime lighting associated with increased expected development within areas of proposed change, streetscape improvements, crime prevention, and

6 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 impacts are addressed on a case-by-case basis as appropriate but are generally no longer considered significant.

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 Original Project allows 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 Original Project also seeks 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 Original Project, 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 Original Project 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 Original Project 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 Original Project 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 Original Project. 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 Original Project 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 Original Project includes 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 Original Project 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 Original Project were determined to be *less than significant*.

*Shade and Shadows.* Impacts of the Original Project were found to be *less than significant* in the South Los Angles CPA but *significant and unavoidable* in the Southeast Los Angeles CPA.

Mitigation Measures**.** No mitigation measures were required.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the proposed changes under the Slauson Corridor TNP were determined to be consistent with the development of the surrounding areas and did not

introduce new significant sources of light and glare in the CPAs. Impacts related to light and glare were determined to be generally the same under the Slauson Corridor TNP as under the Original Project. The Slauson Corridor TNP was determined to not result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

### 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 expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. These proposed changes do not constitute a change to the General Plan Land Use Designation, underlying Zones or Height Districts. As with the Original Project and Slauson Corridor TNP (collectively, the Approved Plans), development under the Modified Project would be constructed using non-reflective materials, and development is not expected to introduce significant new sources of glare. Shade and shadow impacts under the Modified Project would be similar to those under the Original Project and Slauson Corridor TNP Addendum. 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 that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts related to light and glare beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or substantially more severe significant impacts related to light and glare beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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.

Shade and shadows are not topics specifically identified in the CEQA Appendix G checklist, and the City has updated their approach to thresholds and the shade and shadow impacts are addressed on a case-by-case basis and generally no longer considered significant. The Modified Project would not substantially affect light and glare as compared to what was evaluated in the 2017 FEIR or Slauson Corridor TNP Addendum.

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 light and glare beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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

#### *2017 FEIR*

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 Original Project 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 Original Project 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 Original Project 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 Original Project includes 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 Original Project includes 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 occur related to other changes in the existing environment.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP was determined to not result in new significant impacts or substantially more severe impacts regarding agriculture and forestry resources beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

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 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 that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts

related to agriculture and forestry resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; *no impact* would occur.

### 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 agricultural resources, timberland or forestland beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 that would not 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 the Modified Project involves new significant impacts or substantially more severe impacts related to agricultural resources, timberland or forestland beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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## 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

***2017 FEIR***

The air quality plans applicable to the Original Project are the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2012 Air Quality Management Plan (AQMP).[7] 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 Original Project is consistent with the SCAG 2035 projections and would not exceed population or employment projections for the City as a whole. Therefore, the Original Project would not exceed the assumptions in the AQMP.

The Original Project incentivizes new development near transit, while respecting surrounding residential communities. The Original Project focuses 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 Original Project establishes TOD provisions in areas located adjacent to transit. The Original Project encourages 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 Original Project were found to be *less than significant*.

Mitigation Measures. No mitigation measures were required.

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

*Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, as with the Original Project, the Slauson Corridor TNP incentivizes new development near transit, while respecting surrounding residential communities. The Slauson Corridor TNP Addendum increases the focus on mobility, urban design, public safety, and healthy, sustainable communities. Concentrated, mixed-use development adjacent to transit corridors protects existing residential neighborhoods and improves air quality by reducing the use of cars. The Slauson Corridor TNP promotes TOD provisions in areas located adjacent to transit and encourages transit use and the use of non-motorized transportation, such as bicycling and walking.

The proposed changed did not result in new significant impacts or substantially more severe impacts regarding air quality beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project would continue to concentrate growth near transit and thus would increase transit access, mobility options, and encourage the use of non-motorized transportation. The 2017 FEIR evaluated Active Change areas at double the density allowed by underlying zoning. What was evaluated as Reasonably Anticipated Development remains the same with the proposed shifts in TOD designation levels. 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 applicable air quality plans beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 relative to the applicable air quality plan that would be relevant to the analysis of the Modified Project.

**D. Any New Information Requiring New Analysis or Verification?**

The 2016 AQMP was adopted in 2017, as with the 2012 AQMP it relied on RTP/SCS land use assumptions and growth forecasts. 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 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 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 or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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 and Unavoidable<br>Operation: Less than Significant with Mitigation | No | No | No | **AQ1** |

## A. Impact Determination in the EIR

### *2017 FEIR*

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 $PM_{10}$ emissions associated with construction activities by approximately 61 percent.[8] New construction is subject to VOC (Volatile Organic Compounds) 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

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

unmitigated emissions that would exceed the regional threshold for VOC due to the application of architectural coatings. Therefore, without mitigation, implementation of the Original Project 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.

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 Original Project could potentially exceed the LSTs for $NO_X$, $PM_{2.5}$, and $PM_{10}$. 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 Original Project could result in a *significant impact* related to localized construction emissions.

Mitigation Measure **AQ1**, described below, 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 Original Project was 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. Under the Original Project, 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 Original Project would not generate emissions that exceed the SCAQMD regional significance thresholds.

Implementation of the Original Project would increase VMT 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 Original Project 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.[9, 10] There is no potential for the Original Project to generate significant localized CO concentrations at intersections within the CPAs. Furthermore, the Original Project 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 Original Project were found to be *less than significant with mitigation.*

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

*Mitigation Measure*

**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 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 $PM_{10}$ generation.

Level of Significance of Impacts after Mitigation

*Construction.* Mitigation Measure **AQ1** would continue to apply and would reduce impacts. Recent review of environmental analyses indicates most projects are not resulting in significant adverse impacts after mitigation.[11] Nonetheless, the Slauson Corridor TNP Addendum found the impact *significant and unavoidable* for construction.

*Operation.* Despite increases in VMT, emission controls improve over time, and an overall decrease in emissions (with the exception of $PM_{10}$ in the South Los Angeles CPA) continued to be expected under the Slauson Corridor TNP. With respect to $PM_{10}$, the minor increase in emissions (77 pounds per day (lbs/day) under the Original Project and 107 lbs/day under the Modified Project) would continue to be

[11] See for example City of Los Angeles, *Housing Element EIR (2021*), Air Quality analysis starting at page 4.2-41: https://planning.lacity.org/eir/HEU_2021-2029_SEU/deir/files/4.2_Air%20Quality.pdf.

less than the SCAQMD threshold of significance (150 lbs/day). For the combined South Los Angeles and Southeast Los Angeles Community Plans, $PM_{10}$ would not increase under the Original Project but would decrease by 17.2 lbs/day. Under the Slauson Corridor TNP, the combined Community Plans would result in a net increase of 76 lbs/day well under the SCAQMD threshold of 150 lbs/day). Therefore, impacts were found to be *less than significant.*

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP was determined to not result in new significant impacts or substantially more severe impacts conflicting or obstructing the implementation of the applicable air quality plan beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. Therefore, impacts related to construction under the Slauson Corridor TNP were determined to be similar to those under the Original Project*,* and no new mitigation measures were required.

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

Construction. As discussed in Chapter 2, Project Description of this Addendum, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. 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 beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. However, construction impacts under the Modified Project would result in similar impacts to those under the Original Project and Slauson Corridor TNP. Mitigation Measure **AQ1** would continue to apply and would reduce impacts; however, construction impacts would remain *significant and unavoidable* under the Modified Project.

Operation. Under the Modified Project, emission controls improve over time, and an overall decrease in emissions in comparison to the existing conditions of the 2017 FEIR continues to be expected under the Modified Project as for under the Approved Plans. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to federal or state ambient air quality standards beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant*.

**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. 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. 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 the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant*.

### 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 PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

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| 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

***2017 FEIR***

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 Original Project, 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 Original Project

would 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 Original Project 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 requirements of the California Public Resources Code protects staff and students from health risks from exposure to TACs. The Original Project was not expected to expose sensitive receptors to substantial pollutant concentration, and a *less than significant* impact *with mitigation* would 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.

### *Slauson Corridor TNP Addendum*

Construction. As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP was found to result in similar construction emissions as those associated with the Original Project, 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were found to be feasible.

Operation. As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP 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 PRC protects staff and students from health

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.

risks from exposure to TACs. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

Construction. As noted in the analyses of the prior checklist questions related to air quality, the Modified Project would not result in additional growth beyond that evaluated in the Slauson Corridor TNP Addendum which was found to result in similar construction emissions and impacts as those under the Original Project. Implementation of Mitigation Measure **AQ1** to reduce emissions would continue to be required. 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 sensitive receptors beyond what was previously analyzed. The Modified Project would continue to have similar impacts related to sensitive receptors and impacts would remain *significant and unavoidable*.

Operation. Since the Modified Project would not change the growth forecast compared to that analyzed in the Slauson TNP Addendum, impacts would remain the same as in the 2017 FEIR and Slauson TNP Addendum -- *less than significant*.

Overall, 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 sensitive receptors beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 sensitive receptors beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 Modified Project involves new significant impacts or substantially more severe impacts related to sensitive receptors beyond what was previously analyzed in the 2017 FEIR and Slauson TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

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

## F. Conclusion

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

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| 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

### *2017 FEIR*

The Original Project 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.

### *Slauson Corridor TNP Addendum*

As further discussed in Slauson Corridor TNP Addendum, the Slauson Corridor TNP does not designate new industrial areas nor incentivize the industrial uses and operations that are associated with odor complaints. The CPIO District continues to include 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 continues to apply to all parcels with an industrial land use designation that are located adjacent to residentially designated land uses. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

### 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. 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 odor beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to odors beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 odors beyond what was previously analyzed.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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# 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

### *2017 FEIR*

Due to the fully urbanized character of the CPAs, and lack of active rare, endangered or threatened habitats within or near the CPAs, it was found to be unlikely that candidate, sensitive, or special status species may be impacted directly or through habitat modification as a result of the Original Project. 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.

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 Original Project will not impact the utility corridors, parks, or recreation areas of the CPAs that could provide limited habitat. No

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

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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, as compared to the Original Project, the proposed changes under the Slauson Corridor TNP were found to not impact any habits containing candidate, sensitive, or special status species, such as utility corridors, parks, or recreation areas and would not result in changes to open space land uses. The development occurring under Slauson Corridor TNP would comply with the Tree Preservation Ordinance. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The proposed changes under the Modified Project would not impact properties containing active rare, endangered or threatened habitats, including utility corridors, parks, or recreation areas of the CPIO. The Modified Project would not result in changes to land uses on lands containing open areas. As for the Original Project, any protected trees that require removal to implement the Modified Project would be protected by City ordinance and require a permit approved by the Los Angeles Department of Water and Power (LADWP). 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 candidate, sensitive, or special status species beyond what was previously analyzed in the 2017 FEIR and the Slauson Corridor TNP Addendum; impact 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to candidate, sensitive, or special status species beyond what was previously analyzed in the 2017 FEIR and the Slauson Corridor TNP Addendum.

**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 certifies that shows the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

***2017 FEIR***

The Original Project 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 Original Project 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 Original Project includes 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 Original Project supports the goals and policies of the CPAs related to biological resources, found in Table 4.4-3 in the EIR.

None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, the proposed changes under the Slauson Corridor TNP were found to not impact any SEAs, NCCPs, HCPs, riparian habitats, or other sensitive natural communities. The Slauson Corridor TNP was found to not have a substantial adverse effect on any habitats protected under adopted plans, policies, and regulations. Therefore, *no impact* would occur, and no mitigation measures were required.

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

There are no SEAs, NCCPs, HCPs, riparian habitats, or other sensitive natural communities in the South Los Angeles CPIO. Implementation of the Modified Project would not change development assumptions and therefore would not change impacts relative to effects on riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS. 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 other sensitive natural communities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; *no impact* would occur.

**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 riparian habitat or other sensitive natural communities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 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 related to riparian habitat or other sensitive natural communities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

**F. Conclusion**

The Modified Project would not result in any of the conditions set forth in PRC 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

### *2017 FEIR*

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 state or 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 state or federally protected wetland. Therefore, implementation of the Original Project 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, none of the properties impacted by the Slauson Corridor TNP contain state or federally protected wetlands as defined by Section 404 of the Clean Water Act. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

None of the properties impacted by the Modified Project contain federally protected wetlands as defined by Section 404 of the Clean Water Act, and therefore 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 related to state or federally protected wetlands beyond what was analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; *no impact* would occur.

### 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 related to state or federally protected wetlands beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. There are no substantial new state or 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 requiring new analysis or verification 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 state or federally protected wetlands beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

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 Original Project; 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 Original Project did not introduce any features that would preclude implementation of MBTA and CDFW policies or procedures in any way.

The Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, similar to the Original Project, none of the properties impacted by the Slauson Corridor TNP were found to provide viable linkages or migration corridors. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Approved Plans, the Modified Project would not interfere with any habitat linkages or migration corridors. The Modified Project would not change the growth assumptions as compared to what was evaluated in the 2017 FEIR and Slauson Corridor TNP Addendum. Development under the Modified Project would continue to be required to comply with federal and state regulations related to the protection of non-status nesting birds. Impacts to biological resources would remain the same as evaluated in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 movement of any native resident or migratory fish or wildlife species beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain l*ess 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to movement of any native resident or migratory fish or wildlife species beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**D. Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance that has become available relative to habitat linkages or migration corridors 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 related to movement of any native resident or migratory fish or wildlife species beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

The Original Project includes 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 Original Project 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 Original Project did 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 Original Project 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.*

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

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, development under the Slauson Corridor TNP was found to have the same impacts as the Original Project and would comply with City policies related to the protection of open space. The Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Approved Plans, the Modified Project would not result in changed development assumptions beyond those evaluated for the Original Project and Slauson Corridor TNP. The Modified Project would comply with City policies related to the protection of open space and would not conflict with any HCP or SEA, nor any local policies or ordinances protecting biological resources, including protected trees. 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 biological resources, including protected trees, beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain l*ess 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to biological resources, including protected trees, beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 Los Angeles'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 related to biological resources, including protected trees, beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project was found to not 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.

### *Slauson Corridor TNP Addendum*

As discussed in the Slauson Corridor TNP Addendum, as with the Original Project, implementation of the Slauson Corridor TNP was found to not conflict with the provisions of any adopted conservation plan. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

## 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. The implementation of the Modified Project would not result in changed development assumptions beyond those evaluated for the Original Project and Slauson Corridor TNP. 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 that would require major revisions to the 2017 FEIR due to new significant impacts or substantially more severe

impacts related to any adopted conservation plan beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain l*ess than significant*.

### 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to any adopted conservation plan beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance has become available relative to HCPs, NCCPs or SEAs relevant to 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 the Modified Project involves new significant impacts or substantially more severe impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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# 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

### *2017 FEIR*

The Original Project did 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 Original Project does include specific policies and regulations intended to provide further protections for historical resources in the CPAs that have not yet been designated. Specifically, the Original Project established 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 Original Project had 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 Original Project. The Original Project did 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 Original Project, 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 Original Project. Therefore, although it is very unlikely, it is not impossible that future development under the Original Project 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 HPOZ in the Southeast Los Angeles CPA, SurveyLA identifies one eligible historic district (Goodyear Gardens). However, it is not located within the Original Project's Active Change Areas and the zoning and land use designation in the Original Project is 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 Original Project and even those in the CPIO Subareas could be impacted if the property owner conducts additional environmental analysis. Therefore, development under the Original Project could result in impacts to undesignated historical resources.

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

Mitigation Measures. No feasible mitigation measures were identified.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP increased the allowable intensity and density of commercial, residential, and industrial development with the CPAs. However, development under the Slauson Corridor TNP would not preclude implementation of or alter the HPOZ Ordinance and the Cultural Heritage Ordinance policies or procedures. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Approved Plans, the Modified Project is not expected to impact designated historical resources. However, as with the Original Project and Slauson Corridor TNP, it is not impossible that one or more designated resources may be lost by redevelopment. 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. Therefore, although it is unlikely, future development could result in a potentially significant impact to a designated historical resource. 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. 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 in the 2017 FEIR and Slauson

Corridor TNP Addendum. Impacts would continue to be *significant and unavoidable,* with no feasible mitigation measures identified.

### 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

#### *2017 FEIR*

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 could be located on a site with previously unknown archaeological resources. Under the Original Project, future development 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 Measure **CR1**, described below, would reduce construction impacts related to archeological resources to *less than 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, construction under the Slauson Corridor TNP would involve ground-disturbing activities of similar intensity to those under the Original Project, and therefore a similar potential to encounter unknown archaeological resources. As with the Original Project, with implementation of Mitigation Measure **CR1**, impacts to archaeological resources would be *less than significant*. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

Construction under the Modified Project would involve ground-disturbing activities of similar intensity to those under the Original Project and Slauson Corridor TNP, and therefore has a similar potential to encounter unknown archaeological resources. As with the Original Project and Slauson Corridor TNP, without implementation of Mitigation Measure **CR1**, the development proposed under the Modified Project would result in potentially significant impacts related to archaeological resources. 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 related to archaeological resources beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant* with mitigation.

### 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 archaeological resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 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 archaeological resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

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

### F. Conclusion

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

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| 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

***2017 FEIR***

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 Original Project.

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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, as with the Original Project, the potential for development under the Slauson Corridor TNP to disturb human remains interred outside of formal cemeteries is low. Construction under the Slauson Corridor TNP would involve ground-disturbing activities of similar intensity to those under the Original Project, and therefore has a similar potential to encounter unknown human remains. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As previously discussed, construction under the Modified Project would involve ground-disturbing activities of similar intensity to those under the Original Project and Slauson Corridor TNP, and therefore has a similar potential to encounter unknown human remains. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to human remains beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 Modified Project involves new significant impacts or substantially more severe impacts related to human remains beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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

#### *2017 FEIR*

Potential impacts related to energy as well as federal, state and local laws, regulations, plans, and guidelines related to Energy applicable to the Original Project are discussed in Section 4.16, Utilities and Services Systems, of the EIR. Section 4.7, Greenhouse Gas Emissions, of the EIR also includes a discussion of impacts related to energy. The analysis provided in the Section 4.16, Utilities and Services Systems, of the EIR, addresses whether the implementation of the Original Project would result in the wasteful or inefficient use of energy. The impact analysis concluded that the Original Project would result in a less-than-significant impact related to energy. In addition, the analysis in Section 4.7, Greenhouse Gas Emissions, concluded that the Original Project 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.

#### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, all additional incremental development under the Slauson Corridor TNP would be required to comply with all applicable federal, state, and local energy regulations, and energy conservation plans and policies of the City. The Slauson Corridor TNP would therefore not result in a wasteful or inefficient use of electricity or natural gas. Construction under the Slauson Corridor TNP 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. Development under the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more

severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

All development under the Modified Project would continue to be required to comply with applicable adopted plans, policies, and regulations regarding the conservation of energy resources during construction and operational activities. The Modified Project would not conflict with the goals and policies of the SCAG RTP/SCS, the Green LA Action Plan, or any other plan governing energy consumption reduction targets. 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 consumption beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to energy consumption beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 land uses within the TOD Subareas, however all development 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 Modified Project involves new significant impacts or substantially more severe impacts related to energy consumption beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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# 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

### *2017 FEIR*

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 Original Project 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP Project Area is not located within the vicinity of an Alquist-Priolo Earthquake Fault Zone or Fault Rupture Study Area. As with the Original Project, the Slauson Corridor TNP would not facilitate development on known faults or expose people to substantial risk of injury as a result of fault rupture. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and no new information of substantial importance,

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

which was not known and could not have been known with the exercise of reasonable diligence at the time the 2017 FEIR was certified. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project would continue to increase the intensity and density of land uses in TOD Subareas; however, it would not facilitate development on known faults or expose people to substantial risk of injury as a result of fault 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 related to fault rupture beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to fault rupture beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 fault rupture beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

### *2017 FEIR*

The type of development expected to occur under the Original Project 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 Original Project 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, as with the Original Project, the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Original Project and the Slauson Corridor TNP, the Modified Project would not involve any activities which would create or exacerbate unstable seismic conditions in the CPIO. 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 strong seismic ground shaking beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to strong seismic ground shaking beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 related to strong seismic ground shaking beyond what was previously analyzed 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| Issues (and Supporting Information Sources) | | 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

***2017 FEIR***

Liquefaction-prone areas cover a large, central portion of the CPAs. The Original Project 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 Original Project 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.

*Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would increase the allowable intensity, density, and/or types of land uses in the CPAs beyond what was analyzed in the Original Project. Thus, the Slauson Corridor TNP would expose additional numbers of people and/or structures in the CPAs to liquefaction and geologic hazards. 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Therefore, the Modified Project would continue to expose persons and/or structures in the CPIO to liquefaction and geologic hazards. As with the Original Project, the Modified Project would comply with all applicable regulations and policies related to construction within liquefaction zones, and impacts of the Modified Project would be similar to those analyzed in the Original 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 related to liquefaction beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum, 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 undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to liquefaction beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

**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 liquefaction beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, as with the Original Project, development under the Slauson Corridor TNP would comply with the City's requirements related to geotechnical reports and the Building Code and Grading Code. The Slauson Corridor TNP would not increase the potential for landslides in the CPAs, nor exacerbate any existing hillside or landform conditions. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

Development under the Modified Project would continue to be required to comply with the City's geotechnical, building, and grading requirements and would not increase the potential for landslides in the CPIO, 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 beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

#### *2017 FEIR*

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 Original Project 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 be *less than significant.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would incrementally increase the allowable intensity, density, and/or types of land uses within the CPAs. Grading and ground-disturbing activities under the Slauson Corridor TNP would be similar to the Original Project and result in similar impacts related to soil erosion or loss of topsoil. All development under the Slauson Corridor TNP would continue to 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Grading and ground-disturbing activities under the Modified Project would result in similar impacts as the Original Project and Slauson Corridor TNP related to soil erosion or loss of topsoil. All development under the Modified Project would continue to be required to comply with applicable policies and regulations related to geotechnical building considerations. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 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 or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP accommodates incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. Grading and ground-disturbing activities under the Slauson Corridor TNP 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 Slauson Corridor TNP would not include any mining or mineral resource extraction activities. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand the residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions regarding reasonably anticipated development (as refined in the Slauson Corridor TNP Addendum) do not change. Grading and ground-disturbing activities under the Modified Project would result in similar impacts to the Approved Plans related to unstable soils. All development under the Modified Project would continue to be required to comply with applicable policies and regulations related to protection against lateral spreading and liquefaction. The Modified Project would not include any mining or mineral resource extraction activities. Therefore, the proposed changes under the Modified Project would not involve new significant impacts or substantially more severe impacts than what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant*.

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

There are no new circumstances involving new significant impacts or substantially more severe impacts relative to unstable soils that would be relevant to the analysis of the Modified Project.

### 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 or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

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 Original Project 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 Original Project 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.

*Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, development under the Slauson Corridor TNP would continue to 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Original Project, all development under the Modified Project would be required to comply with requirements related to geotechnical construction considerations. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 related to expansive soils beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

**F. Conclusion**

The Modified Project would not result in any of the conditions set forth in PRC 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

### *2017 FEIR*

All portions of the CPAs are currently being served by a public sewerage system. The Original Project does 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, development under the Slauson Corridor TNP would be serviced by existing sewer lines in the CPAs and would not utilize septic tanks. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Original Project, 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 to related septic tanks 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 septic tanks beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP.

## 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 septic tanks beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

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 Original Project 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 Original Project, 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 Measure **CR2** would reduce impacts to *less than significant.*

Mitigation Measure

*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 After Mitigation. Less than significant.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would incrementally increase the allowable intensity, density, and/or types of land uses within the CPAs. Grading and ground-disturbing activities under the Slauson Corridor TNP would be similar to the Original Project and result in similar impacts to paleontological resources and unique geological features. Development under the Slauson Corridor TNP would be required to implement Mitigation Measure **CR2** to reduce impacts to paleontological resources and unique geological features to less than significant levels. Therefore, with implementation of Mitigation Measure **CR2**, impacts under the Slauson Corridor TNP would continue to be *less than significant.* None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Grading and ground-disturbing activities under the Modified Project would result in similar impacts to the Original Projects related to paleontological resources and unique geological features. Implementation of Mitigation Measure **CR2** would reduce impacts to paleontological resources and unique geological features to less than significant levels. 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 paleontological resources beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

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

### F. Conclusion

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

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# 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

### *2017 FEIR*

Implementation of the Original Project would generate greenhouse gas (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 Original Project, 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 $CO_2e$ 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 Original Project is 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 Original Project combines 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 Original Project, 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 Original Project emissions in the future to emissions under BAU is not possible.

The Original Project 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 Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR resulting in minor changes in energy consumption and VMT and therefore GHG emissions. However, the Slauson Corridor TNP did not result in new significant impacts related to GHG emissions. See also the discussion of GHG plans and policies below in response to the next checklist question. The reasonably anticipated growth on the West Adams-Baldwin Hills-Leimert parcels (anticipated to occur with or without the Modified Project) would add minor emissions that would not affect these conclusions. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Modified Project would continue to concentrate growth in TOD Subareas, which would result in more efficient energy consumption and incentivize public transportation use, thus decreasing the VMT within the South Los Angeles CPIO. As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 in the 2017 FEIR and Slauson Corridor TNP Addendum. Also see discussion in the next checklist question.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

The Original Project would be entirely consistent with the 2016-2040 RTP/SCS, AB 32 and SB 375 goals. The Original Project 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 Original Project are expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. The objectives and project features of the Original Project 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 Original Project include Transportation Improvement and Mitigation Programs (TIMPs). According to the TIMPs prepared for the CPAs, the Original Project 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 Climate Action Plan (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 Original Project would add substantial multi-family housing to the CPAs, incorporate TOD, and create more open space. Furthermore, implementation of the Original 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 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 Original 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 VMT and associated GHG emissions from cars and light trucks. The Original Project 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 Original Project were found to be *less than significant.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would incrementally increase population, housing, and employment beyond what was evaluated in the 2017 FEIR resulting in minor changes in energy consumption and therefore GHG emissions. No proposed changes under the Slauson Corridor TNP requires major revisions to the 2017 FEIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed. Similar to the Original Project, the Slauson Corridor TNP would be consistent with the SCAG RTP/SCS and SB 375 goals. The level of detail available for calculating emissions at the CPA level, in particular emission factors consistent with applicable regulations, is not readily available. Nonetheless the growth pattern encouraged by the Modified Project is consistent with AB 32 goals. The Slauson Corridor TNP 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 Original Project 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 Slauson Corridor TNP 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 Slauson Corridor TNP 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.

According to the VMT analysis prepared for the Slauson Corridor TNP Addendum, the VMT per service population would be similar to that of the Original Project. Similar to the Original Project, the total VMT per service population for the Slauson Corridor TNP 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 Original Plans for consistency with GHG reduction plans.

Similar to the Original Project, the Slauson Corridor TNP 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 Slauson Corridor TNP, similar to the Original Project, 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would add residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions regarding reasonably anticipated development do not change. The Modified Project would accommodate the same amount of population, housing, and employment as was evaluated in the Slauson Corridor TNP Addendum. The Modified Project would continue to be consistent with the SCAG RTP/SCS, SB 375, and AB 32 goals and comply with the policies of the Los Angeles Green Building Code. Additionally, concentrating growth within the TOD Subareas would continue to incentivize public transit use over single-occupancy vehicle trips, which could result lower the VMT levels in the CPIO and per capita GHG emissions associated with cars 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, similar to the Original Project and Slauson Corridor TNP, 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 beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 in the 2017 FEIR and Slauson Corridor TNP. 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; 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 Original Project 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 Original Project, 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 8 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 Original Project, 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 primarily concentrate development around within the TOD Subareas.
- *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 Business-As-Usual 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 reductions 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 Original Project, 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.

None of these regulations require new analysis or verification.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

The Modified Plans would not result in any of the conditions set forth in PRC 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

### *2017 FEIR*

The Original Project did 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 Original Project 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 Original Project reduces 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 Original Project also includes 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 Original Project does 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 Original Project 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 Original Project 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 Original Project 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 Original Project, and the land that will remain designated as industrial under the Original Project 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 Original Project would be *less than significant.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the zoning changes under the Slauson Corridor TNP 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 Slauson Corridor TNP did 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 Slauson Corridor TNP continues to 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.

None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. As with the Original Project and Slauson Corridor TNP, the Modified Project would not rezone any non-industrial parcels in the CPIO to industrial uses or other uses typically associated with the transport, use, or disposal of hazardous materials. Development under the Modified Project would continue to be required to comply with to existing regulations related to the handling, use, and storage of hazardous materials, and would any new hazards or hazardous materials introduced into the CPIO. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 the transport, use, or disposal of hazardous materials 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project.[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 Original Project 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.*

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.

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

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 Original Project 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 Original Project 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 would be required to conform with all applicable environmental regulations related to new construction and hazardous materials storage, use and transport. Therefore, potential hazards related to lead, asbestos, methane zones, and USTs were found to be 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 Original Project allows 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 determined potential risks and appropriate mitigation. Therefore, without mitigation, the Original Project was found to result in a *potentially significant* impact related to hazards and hazardous materials before mitigation. Implementation of Mitigation Measure **HM1**, described below, would reduce the severity of construction impacts to *less than significant*.

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 1 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 After Mitigation. Less than significant.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the zoning changes under the Slauson Corridor TNP did 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 Slauson Corridor TNP would continue to 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 Slauson Corridor TNP 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 Original Project, impacts related to soil and groundwater contamination under the Slauson Corridor TNP would remain potentially significant. The Slauson Corridor

TNP would continue to require that Mitigation Measure **HM1** be implemented to reduce the significance of impacts related to hazardous hazards. Impacts under the Slauson Corridor TNP would be similar to those analyzed in the Original Project. Therefore, with implementation of Mitigation Measure **HM1**, impacts were found to be *less than significant*. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

Impacts under the Modified Project would be similar to those analyzed for the Original Project. As previously discussed, the Modified Project would not rezone any non-industrial parcels in the CPIO to industrial uses, and all development would be required to adhere to existing mandatory hazardous materials regulations and comply with regulations to minimize hazard exposure risk. Businesses operating in the CPIO would be required to comply with 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 Original Project, impacts related to soil and groundwater contamination under the Modified Project would remain potentially significant and would require implementation of Mitigation Measure **HM1** to reduce the significance of impacts related to hazards and hazardous materials. Therefore, there are no proposed changes under the Modified Project would require major revisions to the 2017 FEIR due to new or significant impacts or substantially more severe impacts related to hazards and hazardous materials beyond what was analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum; 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 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 in the 2017 FEIR and Slauson Corridor TNP.

### 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 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 the Modified Project involves new significant impacts or substantially more severe impacts related to hazards and hazardous materials beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP.

### E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **HM1** would continue to address impacts related to Hazards and Hazardous Materials. No new mitigation measures would be required.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project 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 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 Original Project was found to result in potentially significant impacts related to hazardous materials near schools before mitigation. 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 to *less than significant*.

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

Mitigation Measures. See Mitigation Measure **HM1**.

Level of Significance After Mitigation. Less than significant.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP 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 Slauson Corridor TNP would not allow, place, or incentivize new industrial businesses within a quarter-mile of public school. The Slauson Corridor TNP 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 Original Project, implementation of the Slauson Corridor TNP was found to not result in a significant impact on schools. Implementation of Mitigation Measure **HM1** would further reduce potential impacts to schools to *less than significant.* None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

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. As with the Original Project, implementation of the Modified Project would not allow, place, or incentivize new industrial businesses within a quarter-mile of public school. Mitigation Measure **HM1** would further reduce potential impacts. Therefore, the proposed changes under the Modified Project would not involve new significant impacts or substantially more severe impacts than what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant* with mitigation. 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 in the 2017 FEIR and Slauson Corridor TNP.

**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 hazardous materials near schools beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 hazardous materials near schools beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

## E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measure **HM1** would continue to address impacts related to Hazards and Hazardous Materials. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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 underground storage tanks (USTs) or contaminated soils to be uncovered or encountered if development in CPAs leads to the development of these sites.

Implementation of the Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would increase the allowable intensity, density, and/or types of land uses within the CPAs. Implementation of the Slauson Corridor TNP could therefore lead to development of additional sites containing contaminated soils or included on a list of hazardous materials sites. As with the Original Project, development under the Slauson Corridor TNP would comply with all local, state and federal regulations related to site remediation and investigation activities prior to the start of construction. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. As with the Original Project, development under the Modified Project would 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 related to site remediation and investigation activities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 site remediation and investigation activities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 site remediation and investigation activities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

**F. Conclusion**

The Modified Project would not result in any of the conditions set forth in PRC 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

### *2017 FEIR*

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 Original Project 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 Original Project was found not to 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP does not include 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

There are no airport land use plans within the South Los Angeles CPIO, and the Modified Project would not include proposed changes which would increase the risk of potential impacts related to airport land use 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 airport land use plans beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum; *no impact* would occur.

### 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 airport land use plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 land use plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

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 Original Project accommodates 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 Original Project does not introduce any features that would preclude implementation of or alter these policies or procedures in any way. Furthermore, the Original Project 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 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP accommodates incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. The incremental increase in population and employment does not result in the need to modify any existing emergency response routes. The Slauson Corridor TNP would not introduce any new infrastructure which would block or hinder existing emergency routes. As with the Original Project, development under the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Therefore, the Modified Project would not impact or result in the need to modify any existing emergency response routes. The Modified Project would not introduce any new infrastructure which would block or hinder existing emergency routes. As with the Original Project, development under the Modified Project would be required to coordinate with LAFD and the Department of Transportation 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

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

severe impacts related to emergency response plans and emergency evacuation plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 emergency response plans and emergency evacuation plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 Modified Project involves new significant impacts or substantially more severe impacts related to emergency response plans and emergency evacuation plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No mitigation measures are warranted.

### F. Conclusion

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

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| 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

### *2017 FEIR*

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

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

located within the CPAs.[20] Implementation of the Original Project 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 were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP did not affect the analysis of wildland fires. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Original Project and Slauson Corridor, 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. in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 wildland fires beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No mitigation measures are warranted.

**F. Conclusion**

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

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

## 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

#### *2017 FEIR*

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 Original Project 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 Original Project 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 Original Project do not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

Furthermore, discharges associated with the Original Project would not create pollution, contamination or nuisance. Implementation of the Original Project 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 Original Project. Furthermore, the Original Project does not introduce any features that preclude implementation of or alter these policies and procedures in any way. Therefore, implementation of the Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP accommodates incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. Construction under the Slauson Corridor TNP would involve ground-disturbing activities of similar intensity to those under the Original Project, and therefore result in similar impacts related to stormwater runoff and water quality standards. As with the Original Project, all future development under the Slauson Corridor TNP 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 Slauson Corridor TNP would not result in a substantial increase of impervious surfaces contributing to runoff and did not include new activities or features that could be sources of contaminants that would degrade groundwater quality. As a result, the Slauson Corridor TNP would not create or contribute runoff water that would exceed the pollutant profile associated with the existing conditions of the CPAs. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Grading and ground-disturbing activities under the Modified Project would result in similar impacts to the Original Project, and 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, nor introduce any new activities or features that could be sources of contaminants that would degrade groundwater quality. 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 stormwater runoff and water quality standards beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 stormwater runoff and water quality standards beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 stormwater runoff and water quality standards beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

#### *2017 FEIR*

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 Original Project 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 Original Project, 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 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 Original Project 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 Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, development under the Slauson Corridor TNP would not involve direct groundwater withdrawal, and therefore, would not deplete groundwater supplies. The Slauson Corridor TNP would also not interfere with groundwater recharge since the CPAs are not significant areas for groundwater recharge. As with the Original Project, all future development under the Slauson Corridor TNP would continue to be required to comply with federal, state, and City regulations, requirements, and BMPs to reduce impacts related to groundwater depletion and recharge. Potable water demand under the Slauson Corridor TNP would slightly decrease compared to what was forecasted in the Original Project. Additionally, LADWP is anticipated to reduce per capita water consumption within its service area to adequately meet the water consumption demand projected by the Slauson Corridor TNP. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the

Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. These proposed changes would not result in an increase in water demand and would not substantially impact groundwater recharge supplies. As with the Original Project and Slauson Corridor TNP, development under the Modified Project would not involve direct groundwater withdrawal, nor introduce any new activities which would deplete groundwater or impede groundwater recharge. All future development under the Modified Project would continue to be required to comply with all applicable regulations, requirements, and BMPs to reduce impacts related to groundwater depletion and recharge. Additionally, LADWP is anticipated to adequately meet the water consumption demand projected by the Modified Project and adequately recharge groundwater supplies. 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 groundwater supplies beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

Since the publication of the 2015 Urban Water Management Plans (UWMP), a number of major developments have occurred which affect future available water supplies. 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 Newson 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. 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 groundwater supplies beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 Original Project, 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 recharge groundwater supplies in the CPIO. 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 groundwater supplies beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC Section 21166I or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

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| 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

***2017 FEIR***

The Original Project 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 Original Project would create new housing, population, and employment capacity in targeted areas, primarily TOD areas. Future development within the Active Changes Areas of the Original Project 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 Original Project 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 Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP accommodates incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. As with the Original Project, future development under the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project would comply with applicable federal, state, and local regulatory requirements 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 related to erosion and siltation beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 erosion and siltation beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## 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 erosion and siltation beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

The Original Project would not alter the existing drainage pattern of the CPAs through the alteration of the course of a stream or river. The Original Project 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 Original Project 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 Original Project 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 Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would result in zoning changes which accommodates incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. These zoning changes would maintain existing residential and open space land uses and would primarily target industrial and commercial land uses. As previously discussed, the Slauson Corridor TNP is anticipated to result in similar impacts related to stormwater runoff as what was analyzed in the Original Project. Compliance with applicable federal, state, and local regulatory requirements would minimize any potential impacts to drainage patterns. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Modified Project would maintain existing open space land uses and would primarily target residential land uses for affordable housing preservation, R1R3 zones design regulation changes, and increased allowable density in TOD Subareas. Compliance with applicable federal, state, and local regulatory requirements would minimize any potential impacts to drainage patterns, and the Modified Project is anticipated to result in similar impacts related to stormwater runoff as what was analyzed in the Original 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 related to surface runoff beyond what was previously analyzed. in the 2017 FEIR and Slauson Corridor TNP Addendum

**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 surface runoff beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 surface runoff beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

Future development within the CPAs, including the Active Changes 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 Original Project 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 Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, new development in CPAs under the Slauson Corridor TNP would result in a negligible increase in impermeable surfaces compared to existing conditions. Implementation of the Slauson Corridor TNP would result in similar impacts to stormwater runoff as the Original Project. 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 would be similar to the Original Project. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Implementation of the Modified Project would result in similar impacts to stormwater runoff as the Original Project. Compliance with applicable federal, state, and local regulatory requirements would minimize any potential impacts related to stormwater runoff, and the Modified Project is anticipated to result in similar impacts related to stormwater drainage and polluted runoff as what was analyzed in the Original 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 related to stormwater drainage and polluted runoff beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

**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 stormwater drainage and polluted runoff beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 stormwater drainage and polluted runoff what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

#### *2017 FEIR*

The Original Project 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 Original Project 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 Original Project 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 Original Project 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 Original 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, impacts related to surface runoff that would result in flooding were found to be *less than significant.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the zoning changes proposed under the Modified Project would preserve existing residential and open space land uses in the CPAs. As with the Original Project, the Modified Project would result in a negligible increase in impervious surfaces compared to existing conditions. Future development under the Modified Project would continue to 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Modified Project would preserve open space land uses in the CPIO and would result in a negligible increase in impervious surfaces compared to existing conditions. Similar to the Original Project and Slauson Corridor TNP, compliance with applicable water quality and stormwater regulations and development standards 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 related to surface runoff that would result in flooding beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 surface runoff that would result in flooding beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 surface runoff that would result in flooding beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project 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 Original Project 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.

***Slauson Corridor TNP Addendum***

Compliance with the existing regulatory requirements related to flood plain management previously discussed would ensure that the Slauson Corridor TNP would not place housing within a flood hazard area without incorporating proper floodplain management measures. The Slauson Corridor TNP 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 Slauson Corridor TNP would coordinate with the City and FEMA to verify the location of development sites relative to any FEMA flood plains. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Original Project and Slauson Corridor TNP, the Modified Project would continue to comply with the existing regulatory requirements related to flood plain management to ensure development 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, and development located on or nearby FEMA flood plains would be coordinated with the City and FEMA. 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 flood hazard area, tsunamis, or seiche zones beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

**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 flood hazard area, tsunamis, or seiche zones beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 flood hazard area, tsunamis, or seiche zones beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project does 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 Original Project are located within the Water Replenishment District of Southern California and are subject to the regulations and policies contained within the Groundwater Basins Master Plan (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 Original Project 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 Original Project would not interfere with public uses of the groundwater supply, reduce the water yields of adjacent wells or well fields, adversely change the rate or direction of groundwater flow, or reduce groundwater recharge capacity. No other activities would occur as a result of the Original Project that would have an effect on groundwater. The Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would not involve any direct groundwater withdrawal or injection. Impacts related to impervious surfaces would be similar under the Modified Project as with the Original Project. All development under the Modified Project would continue to 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Modified Project would not involve any direct groundwater withdrawal or injection. Compliance with federal, state, and local requirements related to water quality standards and stormwater runoff would ensure that impacts related to impervious surfaces would be similar under the Modified Project as with the Original Project and Slauson Corridor TNP. 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 related to water quality control plans or sustainable groundwater management plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 water quality control plans or sustainable groundwater management plans beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**D. Any New Information Requiring New Analysis or Verification?**

Refer to Section 3.19, Utilities and Service Systems, 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 applicable water quality plans or sustainable groundwater management plans. 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 a water control plan or groundwater management plan beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum and no new mitigation measures are warranted.

## F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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, 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 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

***2017 FEIR***

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 Original Project does not include zoning or land use designations that would substantially change existing land use patterns or connectivity in the area. Furthermore, the Original Project does 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 Original Project 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 were subject to the new 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 Original Project 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 Original Project, in both Change Areas and Non-Change Areas, generally seeks 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 Original Project would not 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would result in zoning changes which would increase the allowable intensity, density, and/or types of land uses within the CPAs. 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 Slauson Corridor TNP 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 Original Project, the Slauson Corridor TNP would support complete streets, increased access, and connectivity to transit. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The proposed changes under the Modified Project would strengthen residential neighborhood stability and compatible land use development and promote the preservation of affordable housing. The Modified Project would preserve existing open space land uses and would not substantially change land use patterns in the CPIO, nor introduce any new infrastructure which could physically divide or isolate existing communities. The Modified Project would also continue to 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 related to land use and planning beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

**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 land use and planning beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 Modified Project involves new

significant impacts or substantially more severe impacts related to land use and planning beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are required.

### F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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

***2017 FEIR***

The Original Project includes 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 Original Project improves 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 Original Project 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 Original Project, 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 Original Project' land use changes also serve to create consistency with anticipated land uses. The Original Project fosters quality development in transition areas. In some cases, the Original Project allows for increased FARs and height regulations. The Original Project facilitates 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 Original Project, 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 Original Project establishes the CPIO Residential Subareas, which are intended to maintain and protect the existing scale and character of specific residential neighborhoods. The Original Project directs 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 Original Project re-designates 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 Original Project 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 Original Project and the City's Framework Element. The Original Project preserves the character of lower-density neighborhoods by maintaining lower-density land use designations, as well as the establishment of the CPIO Residential Subareas. The Original Project directs growth away from these existing residential neighborhoods towards corridors near commercial centers. Therefore, the Original Project is 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 Original Project accommodates 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 Original Project would be consistent with adopted land use policies included in SCAG's 2012-2035 RTP/SCS. The Original Project 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 Original Project would not result in substantial increased potential for land use conflicts between existing and future land uses. In particular, the Original Project promotes compatibility between industrial, residential, and other sensitive uses. Because of the land use incompatibilities existing prior to adoption of the Original Project 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 Original Project, 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 Original Project, 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 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 Original Project does 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 Original Project 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 Original Project 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 mandate 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 Original Project would be subject to compliance with this criterion prior to inhabitance by future residents.

Based on the above, impacts related to consistency with applicable land use plans, policies, or regulations under the Original Project were found to be *less than significant.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the proposed zoning changes under the Slauson Corridor TNP incentivize green employment opportunities and more intense residential, commercial, and industrial development. The Slauson Corridor TNP would also increase land use flexibility, improve compatibility between land uses and visual characteristics, and extend TOD regulations within the CPAs. The Slauson Corridor TNP 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 Slauson Corridor TNP 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 Slauson Corridor TNP would target properties with inconsistent land uses not addressed in the Original Project. These properties would be rezoned to improve the consistency of existing land uses with the surrounding environment. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The proposed zoning changes would strengthen residential neighborhood stability and compatible land use development and comply with the Framework Element's policies related to growth in higher-intensity commercial centers close to transportation and services. The Modified Project would also expand housing replacement requirements, preserve the character of existing single-family and lower-density neighborhoods and promote the preservation of affordable housing for a range of income levels in compliance with the goals of the Housing Element and land use policies of the RTP/SCS. In addition, the Modified Project would not result in substantial increased potential for land use conflicts between existing and future land uses. 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 consistency with applicable land use plans, policies, or regulations beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### 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 consistency with applicable land use plans, policies, or regulations beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. In addition, The Housing Element of the General Plan was updated for years 2021-2029 and 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 the preservation of Affordable Housing development through the incorporation of requirements set forth by the Housing Crisis Act of 2019. The Modified Project would also continue to encourage residential and employment growth around TOD, and therefore would be compatible with the goals and objectives of the updated Housing Element.

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 consistency with applicable land use plans, policies, or regulations beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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## 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: | | | | | |
| (a) 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 |

### A. Impact Determination in the Certified EIR

#### 2017 FEIR

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 Original Project retains 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 Original Project does 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 Original Project does not result in a loss of availability of known mineral resources. The Original Project does not include any components that would result in the extraction of these resources, or further preclude the extraction of such resources. Implementation of the Original Project would not result in the loss of availability of mineral resources, and *no impact* would occur.

The Original Project does not include any components that would result in the loss of availability or access to mineral resources. The Original Project would not result in the recovery of resources in the MRZ-2 nor would they further preclude the recovery of such resources. The Original Project does 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 Original Project would not result in the loss of access or availability of mineral resources from these areas.

The Conservation Element has policy which pertain to the loss of a known and/or locally important mineral resource. The policies of the Original Project are consistent with these objectives and policies.

The Original Project does 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 Original Project would not introduce new oil districts or oil producing uses and would retain the existing O District zoning and its corresponding permitting procedures. The Original Project introduces additional policies relevant to new oil well operations as deemed necessary and consistent with the General Plan.

Implementation of the Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, none of the properties under the Slauson Corridor TNP are located in an MRZ-2 zone, nor are identified within an area containing mineral deposits of regional or statewide significance. As with the Original Project, the Slauson Corridor TNP does not include any components that would result in the extraction of mineral resources. The Slauson Corridor TNP would not reduce the availability of mineral resources within the CPAs nor result in a loss of availability of known mineral resources. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Modified Project would not affect any properties located in an MRZ-2 zone, nor include any components that would result in the extraction of mineral resources. As with the Original Project and Slauson Corridor TNP, the Modified Project would not reduce the availability of mineral resources within the CPIO 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 related to a loss of availability of known mineral resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 a loss of availability of known mineral resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 a loss of availability of known mineral resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

**E. Certified EIR's Mitigation Measures Addressing Impact**

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

**F. Conclusion**

The Modified Project would not result in any of the conditions set forth in PRC SectioI1166(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, 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<br>Operation: Less Than Significant with Mitigation | No | No | No | **N2** |

### A. Impact Determination in the Certified EIR

***2017 FEIR***

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 Original Project. 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 Original Project would result in a *significant impact* related to construction noise exceeding established standards.

Operation

The Original Project was 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 proposed zoning would have a lesser impact on adjacent sensitive uses compared to the existing zoning.

Under the Original Project, 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 Original Project. Therefore, prior to implementation of mitigation and due to the introduction of new land uses, the Original Project 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 Original Project. The Original Project 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

*Construction.* 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 Original Project (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 Original Project. Regardless, impacts related

to the generation of construction noise in excess of the LAMC standards under the Original Project would be *significant and unavoidable*.

*Operation.* 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.*

***Slauson Corridor TNP Addendum***

Construction. As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP does not propose changes which involve new significant impacts or substantially more severe impacts related to construction noise. The types of construction activities associated with the Slauson Corridor TNP would be similar to the types of construction activities considered as part of the Original Project. 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 Original Project, 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 Slauson Corridor TNP Addendum, even with implementation of Mitigation Measure **N1**, the development proposed under the Slauson Corridor TNP would result in potentially significant impacts related to construction noise. However, there are no proposed changes under the Slauson Corridor TNP that would result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

Operation. As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP does not propose changes which involve new significant impacts or substantially more severe impacts related to operational noise. Similar to the Original Project, the Slauson Corridor TNP was designed to reduce conflicts and promote compatible development. However, the Slauson Corridor TNP 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 Original Project, 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 Slauson Corridor TNP. Therefore, prior to implementation of mitigation and due to the introduction of new land uses, the Slauson Corridor TNP 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 Slauson Corridor TNP would result in a *less than significant*

impact. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

Construction. The types of construction activities under the Modified Project, as well as noise levels associated with construction, would be similar to those considered as part of the Original Project and Slauson Corridor TNP and could exceed LAMC standards. As discussed in the 2017 FEIR and Slauson Corridor TNP Addendum, even with implementation of Mitigation Measure **N1**, the development proposed under the Modified Project would result in potentially significant impacts related to construction noise. However, there are no proposed changes under the Modified Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *significant and unavoidable*. 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 related to construction noise beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

Operation. Similar to the Original Project and Slauson Corridor TNP, noise conflicts could exist on the boundary between zones or in areas with mixed land uses. The Modified Project would shift allowable intensity of development in certain TOD Subareas, which would result in similar noise impacts on adjacent sensitive uses compared to the Original Project. Most new large development that could potentially cause noise impacts would be located within the TOD Subareas. Compliance with the LAMC and CPIO's existing development standards would reduce the potential for land use inconsistencies and 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 Modified Project. As discussed in the 2017 FEIR and Slauson Corridor TNP Addendum, 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 result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant*. 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 construction noise beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### 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 being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related to construction noise beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. The types of construction activities associated with the Modified Project would be similar to the types of construction activities considered as part of the Original Project and Slauson Corridor TNP.

Operation. 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 construction noise beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. The types of land uses included in the Modified Project would be similar to the types of land uses considered as part of the Original Project and Slauson Corridor TNP.

### D. Any New Information Requiring New Analysis or Verification?

Construction. The potential sources of construction noise are the same between the Modified Project and Original Project. 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 construction noise beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

Operation. The potential sources of operational noise are the same between the Modified Project and Original Project. 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 construction noise beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **N1** and **N2** would continue to address impacts related noise. No new mitigation measures

### F. Conclusion

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

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| 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

***2017 FEIR***

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 Original Project was 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 Original Project would not be perceptible by sensitive receptors. Therefore, impacts related to operational vibration under the Original Project 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:

- 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.

21 FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

- 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.

***Slauson Corridor TNP Addendum***

Construction Vibration. As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP does not propose changes which involve new significant impacts or substantially more severe impacts related to construction vibration. As noted above, the types of construction activities associated with the Slauson Corridor TNP would be similar to the types of construction activities considered as part of the Original Project. Similar to the Original Project, 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 Slauson Corridor TNP was found to result in potentially significant impacts related to construction vibration. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

Operation Vibration. As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP does not propose changes which involve new significant impacts or substantially more severe impacts related to operational vibration. As discussed in the Original Project, the development anticipated under the Slauson Corridor TNP was found to result in a *less than significant* impact. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

Construction Vibration. The Modified Project does not propose changes which involve new significant impacts or substantially more severe impacts related to construction vibration. Construction activities associated with the Modified Project would be similar to the types of construction activities considered as part of the Original Project. Sensitive receptors could experience vibration impacts such that, even with implementation of Mitigation Measures **N3** and **N4**. Therefore, the development proposed under the Modified Project would result in potentially significant impacts related to construction vibration. However, there are no proposed changes under the Modified Project that would involve new significant impacts or substantially more severe impacts than what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *significant and unavoidable.* 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 related to construction vibration beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

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 and Slauson Corridor TNP Addendum, the development anticipated under the Modified Project would result in a less than significant impact. There are no proposed changes under the Modified Project that would result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant.* 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 related to operational vibration beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

**C. Any New Circumstances Involving New Significant Impact 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 Original Project and Slauson Corridor TNP. 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 construction vibration beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

Operation. The types of land uses include in the Modified Project would be similar to the types of land uses considered as part of the Original Project and Slauson Corridor TNP. 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 operational vibration beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 the Modified Project involves new significant impacts or substantially more severe impacts related to construction vibration beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. The potential sources of construction and associated vibration are the same between the Modified Project and Original Project.

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 the Modified Project involves new significant impacts or substantially more severe impacts related to operational vibration beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. The potential sources of operational vibration are the same between the Modified Project and Original Project.

**E. Certified EIR's Mitigation Measures Addressing Impact**

Mitigation Measures **N3** and **N4** would continue to address impacts related vibration. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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 excess noise levels? | No Impact | No | No | No | No |

## A. Impact Determination in the Certified EIR

### *2017 FEIR*

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 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 Original Project 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would not affect impacts related to being in the vicinity of an airport. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

22 Los Angeles County Airport Land Use Commission, *Airport Influence Areas*, May 13, 2003.

### 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 in the 2017 FEIR and Slauson Corridor TNP Addendum

### 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 being in the vicinity of an airport beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 being in the vicinity of an airport beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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## 3.14 POPULATION AND HOUSING

As part of the 2018 CEQA Guidelines update, 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

***2017 FEIR***

Implementation of the Original Project was anticipated to 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 new Community Plans included in the Original Project) for the CPAs in order to accommodate population growth and housing and employment demand projected by SCAG through the year 2035. The Original Project would not introduce unplanned infrastructure in the CPAs.

The Original Project included a vision for the long-term physical and community enhancement of the CPAs. The Original Project provides 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 Original Project follows 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 Original Project allows 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 anticipated under the Original Project was also found to be consistent with Citywide projections and is not considered substantial with respect to anticipated growth in the City as a whole. The Original Project directs growth to targeted areas that can accommodate greater development, including TOD areas, while protecting residential neighborhoods and established industrial areas. The Original Project resulted in an increase in reasonably expected development that 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 Original Project would ensure that projected population growth is accommodated and would not result in unplanned population growth.

Employment Growth. The Original Project did 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 Original Project 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 Original Project would not cause growth or accelerate development in an undeveloped area that exceeds SCAG's 2035 projections.

Conclusion. The Original Project was found to not introduce new infrastructure or the extension of roads. Although both Community Plans 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 Original Project was found to not induce substantial growth through employment-generating uses. Moreover, the adoption of the Original Project was found to not result in inconsistencies with adopted City or regional housing policies. The Original Project was found to 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 Original Project was found to not induce growth but rather accommodate anticipated growth. Therefore, impacts related to inducing substantial growth under the Original Project were found to be *less than significant*.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP 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 modified the allowable intensity, density, and/or types of uses on those properties and thus increased the capacity for housing and jobs in the CPAs. In addition, the Slauson Corridor TNP 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-Baldwin Hills-Leimert CPA. These changes would not result in changes to the land use density or intensity in the West Adams-Baldwin Hills-Leimert CPA. The Slauson Corridor TNP Addendum found that the changes in growth that could result from the Slauson Corridor TNP were minor (see **Table 3-1**).

The Slauson Corridor TNP includes new land use regulations that alter the existing Community Plan Implementation Overlays (CPIOs) for the CPAs and include zone changes, General Plan amendments, and FAR and setback standards. The Slauson Corridor TNP incentivizes the construction of denser housing development in proximity to TOD within Industrial land uses, and development within the South and Southeast Los Angeles CPAs and clarifies open space requirements in the West Adams-Baldwin Hills-Leimert CPA.

| TABLE 3-1: CHANGE IN GROWTH – WITH SLAUSON CORRIDOR TNP VS. ORIGINAL PROJECT | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | **EIR Existing Conditions (2010)** | **Original Project 2035*** | **With Slauson Corridor TNP 2035**** | **Original Project 2035 vs. Existing** | **With Slauson Corridor TNP 2035 vs. Existing** | **Original Project 2035 Percentage Change vs. Existing** | **With Slauson Corridor TNP 2035 Percentage Change vs. Existing** | **Percentage Point Change With Slauson Corridor TNP vs. Original Project** |
| **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 | 321,351 | 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; 2017, 2022

The Slauson Corridor TNP 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 Slauson Corridor TNP would reasonably accommodate incrementally increased population, housing, and employment beyond what was evaluated in the Original Project.

The Original Project was found to result in a less than significant impact due to consistency with adopted housing policies, including the 2008 RTP/SCS. The Slauson Corridor TNP was similarly found to be consistent with state, regional (SCAG RTP/SCS and RHNA) and local plans and policies to promote growth in proximity to transit.

As with the Original Project, the Slauson Corridor TNP was found to 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 Slauson Corridor TNP increases allowable housing density and offers business and housing incentives under the regulations in the new CPIO Chapter. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project seeks to further implement the policy vision of the Original Project. The Modified Project would result in similar population, housing, and employment as was evaluated in the Slauson Corridor TNP Addendum. The Modified Project would continue to direct growth to TOD Subareas and would not induce substantial growth through employment-generating uses, nor introduce new infrastructure or the extension of roads. The proposed changes under the Modified Project would continue to be consistent with state, regional, and local plans and policies to promote growth in proximity 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 related to unplanned population growth beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

As discussed in Chapter 2, Project Description, on September 16, 2021, Governor Gavin Newson 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). As further discussed in Chapter 2, the increase in allowable residential density on single-family lots and around TOD areas that is

incentivized by these laws is generally anticipated within the growth assumptions of the 2017 FEIR as refined in the Slauson Corridor TNP Addendum. 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 unplanned population growth beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 unplanned population growth beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 Original Project. 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 3-2**, *assuming that growth occurs at a linear pace each year,* the 2020 Decennial Census data would indicate that the Original Project may have overestimated population, housing, and employment numbers within the South Los Angeles 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 evaluated a forecast that was for 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 Original Project (e.g., warehouse space typically employs far fewer people in the same space as compared to commercial uses). The analysis of the Original Project 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 Original Project and those identified above for the Modified Project are extremely conservative (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.

In addition to new US Census data, since the publication of the Original Project, the Southern California Association of Governments (SCAG) 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 to 44 million. This reduction in growth is carried through to the SCAG regional and local forecasts included in the 2020 – 2045 RTP/SCS. **Table 3-3** compares the change in reasonably foreseeable growth projections for the 2020-2045 RTP/SCS (for the year 2035) compared to those for the Original Project. The table indicates less growth in population, housing, and employment for the South Los Angeles CPA than was analyzed for the Original Project in the 2017 FEIR.

Based on the US Census data showing declines in jobs in the South 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 Original Project 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 Modified Project.

**TABLE 3-2: CHANGE IN GROWTH – CENSUS VS. ORIGINAL PROJECT IN SOUTH LOS ANGELES CPA**

| Demographic Characteristic | EIR Existing Conditions | 2020 Census | 2020 Reasonably Expected Growth Original Project* | 2020 Census Change vs. EIR Existing | 2020 Original Project* vs. EIR Existing | 2020 Census Percentage Change vs. EIR Existing (%) | 2020 Original Project* Percentage vs. EIR Existing (%) | Percentage Point Change 2020 Census vs. 2020 Original Project* |
|---|---|---|---|---|---|---|---|---|
| Population (persons) | 270,354 | 277,921 | 290,996 | 7,567 | 18,118 | 2.8 | 6.7 | -3.9 |
| Dwelling Units | 82,186 | 86,832 | 83,686 | 4,646 | 6,546 | 5.7 | 8.0 | -2.3 |
| Employment (jobs)** | 51,078 | 39,584 | 50,685 | -11,494 | 7,663 | -22.5 | 15.0 | -37.5 |

* Reasonably expected growth interpolated from Original Project assuming linear growth from EIR Existing (2010) to the Original Project 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

**TABLE 3-3: CHANGE IN GROWTH – 2020-2045 RTP/SCS VS. ORIGINAL PROJECT IN SOUTH LOS ANGELES CPA**

| Demographic Characteristic | EIR Existing Conditions | Original Project 2035* | 2020-2045 RTP/SCS 2035** | Original Project 2035 vs. EIR Existing | 2020-2045 RTP/SCS 2035 vs. EIR Existing | Percentage Change Original Project 2035 vs. EIR Existing | Percentage Change 2020-2045 RTP/SCS 2035 vs. EIR Existing | Percentage Point Change 2020-2045 RTP/SCS 2035 vs. Original Project 2035 |
|---|---|---|---|---|---|---|---|---|
| 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 |

* Reasonably expected growth from Original Project.
** Reasonably expected growth for the year 2035 identified in the 2020 – 2045 RTP/SCS
**SOURCE**: City of Los Angeles, Department of City Planning, 2016; SCAG, 2020

## E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

The Original Project did not entitle specific development projects. No housing units were specifically proposed to be demolished, converted to market rate, or removed through other means as a result of the Original Project. Thus, it was not anticipated that the Original Project would result in substantial displacement of existing housing. The majority of new development was expected to occur in the Active Change Areas of the CPAs located along major corridors and at transit station areas.

Although the 2017 FEIR 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 land use designations and zoning under the Previous Plans (i.e., those in place prior to the adoption of the new South and Southeast Community Plans evaluated in the 2017 FEIR). Generally, the areas of the CPAs designated and zoned for residential land uses under the Previous Plans remained designated and zoned to allow for residential land uses, and the residential neighborhoods in the CPAs did not change significantly due to the Original Project. The Original Project serves 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 Original Project would be located in the proposed Active Change Areas along major corridors and at transit station areas. In a few cases Active Change Areas were on land zoned residential, but these instances were limited and occurred along major corridors or in close proximity to Metro light rail stations.

The Original Project accommodates 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 Original Project was found to not displace substantial numbers of existing housing units, and impacts related to housing displacement were found to be *less than significant*.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would accommodate incrementally greater population, housing, and employment numbers in the CPAs than evaluated for the Original Project in the 2017 FEIR. The Slauson Corridor TNP was found to not include changes that would result in new or substantially more severe impacts related to displacement. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project would not include changes that would result in new or substantially more severe impacts related to displacement. Therefore, the proposed changes under the Modified Project would not involve new significant impacts or substantially more severe impacts than what was identified in the 2017 FEIR and Slauson Corridor TNP; impacts would remain *less than significant*. Therefore, there is 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 housing displacement beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

See discussion of above checklist question for discussion of SB 8, 9, and 10. However, 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 housing displacement beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 housing displacement beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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# 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

### 2017 FEIR

The Original Project did 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 Original Project was 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 Original Project was expected to reduce the industrial uses. The Original Project reduces 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 Original Project reduces 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 Original Project 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 Original Project 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 CPA 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 Original Project, 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 Original Project 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 Original Project. 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP proposed zoning changes in the Slauson Subareas of the South Los Angeles and Southeast Los Angeles CPAs to accommodate incrementally increased population, housing, and employment beyond what was evaluated in the Original Project. The Slauson Corridor TNP would not result in changes to growth in the West Adams-Baldwin Hills-Leimert CPA. The Slauson Corridor TNP could therefore increase incrementally the demand for fire services in the South Los Angeles and Southeast Los Angeles CPAs. 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 Slauson Corridor TNP. 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 in the Original Project, 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. None of the

23 City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan*, Exhibit H, 1996.

proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project would therefore not increase the demand for fire services. As with the Original Project, the LAFD would continue to provide additional personnel and equipment as needed to maintain acceptable service levels in conformance with existing regulations. No new fire stations are planned or proposed under the Modified Project, and the incremental increase in population is not anticipated to result in the need for new or expanded fire protection facilities. As discussed in the Original Project, 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, and the construction and operations of such facilities is expected to result in less than significant impacts. Therefore, proposed changes under the Modified Project would not involve new significant or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP; impacts would remain *less than significant*. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum

### 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 fire protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 Decennial Census, the 2020 growth forecast interpolated from the Original Project, and more recent growth forecasts in the SCAG 2020-2045 RTP/SCS. The Original Project estimated greater population, housing, and significantly greater employment numbers within the South Los Angeles CPIO than the actual conditions indicated by the United States Census data and more than the recent forecasts in the 2020-2045 RTP/SCS. The Department of City Planning believes that the employment forecasts in the Original Project were extremely conservative (high) because of over-estimates of employment density.

In addition to new United States Census data, 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 to 44 million. This reduction in growth is carried through to the SCAG regional forecasts include in the 2020 – 2045 RTP/SCS. 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 fire protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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: | | | | | |
| ii. Police Protection? | Less than Significant | No | No | No | No |

### A. Impact Determination in the Certified EIR

#### *2017 FEIR*

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 Original Project does not contain any specific regulations that would affect police protection services. The Original Project does not constitute a commitment to any project-specific construction; however, the Reasonably Expected Development from the Original Project 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 Original Project. 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 Original Project, 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 Original Project 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 Original Project could potentially increase the demand for police protection services. While implementation of the Original Project 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 Original Project. 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.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the proposed zoning changes under the Slauson Corridor TNP would accommodate incrementally increased population, housing, and employment in the South Los Angeles and Southeast Los Angeles CPAs beyond what was evaluated in the Original Project and would not result in changes to growth in the West Adams-Baldwin Hills-Leimert CPA. The Slauson Corridor TNP could therefore incrementally increase 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

[24] City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan*, Exhibit H, 1996.

Slauson Corridor TNP. As discussed in the Original Project, 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. As with the Original Project and Slauson Corridor TNP t, the LAPD would continue to provide additional personnel and equipment as needed to maintain acceptable service levels. No new police stations are planned or proposed under the Modified Project, and the incremental increase in population is not anticipated to result in the need for new or expanded police protection facilities. As discussed in the Original Project and Slauson Corridor TNP, it was 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, and the construction and operations of such facilities is expected to result in less than significant impacts. Therefore, proposed changes under the Modified Project would not involve new significant or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant*. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 police protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

As discussed in Section 3.14, Population and Housing, the Original Project forecasted greater population, housing, and employment data than indicated by the 2020 US 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 Original Project are extremely conservative (high) because of over-estimates of employment density. In addition to new 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 and data from the 2020-2045 RTP/SCS indicates less growth in population, housing, and employment for the South Los Angeles CPIO than what was forecasted for the Original 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 the Modified Project involves new significant impacts or substantially more severe impacts related to police protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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. School | Less than Significant | No | No | No | No |

### A. Impact Determination in the Certified EIR

***2017 FEIR***

The Original Project did not contain any specific regulations that would affect public schools and does not constitute a commitment to any project-specific construction; however, the Reasonably Expected Development from the Original Project 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 Original Project 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 schools 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would increase the allowable number of units and buildable square footage in the South Los Angeles and Southeast Los Angeles CPAs and thus would increase their reasonably anticipated population and employment growth. The Slauson Corridor TNP would not result in changes to reasonably anticipated development in the West Adams-Baldwin Hills-Leimert CPA. Due to the increased allowable density in the CPAs, the Slauson Corridor TNP would generate approximately eight percent more students in the South Los Angeles CPA and five percent more students in the Southeast Los Angeles CPA than what was estimated in the Original 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, and the construction and operations of such facilities is expected to result in less than significant impacts. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Original Project estimated the number of students generated by the Original Project based on the proposed units and non-residential buildable square footage in each CPA using LAUSD student generation rates. As discussed in Chapter 2, Project Description, an, the Modified Project would shift the allowable intensity of development in certain TOD Subareas. As with the Original Project and Slauson Corridor TNP, any new or expanded school facilities that are deemed necessary in the future to accommodate population growth is expected to result in less than significant impact. Under the Modified Project, schools would continue to 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 police protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 police protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

As discussed in Section 3.14, the 2017 FEIR includes forecasted development that implies (assuming liner 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, housing, and employment for the South Los Angeles CPIO than the 2017 FEIR forecast for the Original Project interpolated for the year 2020 (assuming linear growth). The Original Project estimated greater growth in population, housing, and employment for the South Los Angeles CPIO 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. 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 police protection services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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25 LAUSD, "*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. Park? | Less than Significant | No | No | No | No |

## A. Impact Determination in the Certified EIR

### *2017 FEIR*

Implementation of the Original Project 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 Original Project 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 Original Project. 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would accommodate the same amount of housing, and employment as what was evaluated in the 2017 FEIR. No new parks or recreational facilities were planned or proposed under the Slauson Corridor TNP 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 Slauson Corridor TNP Addendum, 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. No new parks or recreational facilities are planned or proposed under the Modified Project. As discussed in the 2017 FEIR and Slauson TNP Addendum, 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, proposed changes under the Modified Project would not involve new significant or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *less than significant*. 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 park services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 park services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

Refer to Section 3.14 Population and Housing in 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 for the Original Project, and more recent growth forecasts in the SCAG 2020-2045 RTP/SCS. The Original Project estimates greater population, housing, and significantly greater employment numbers (assuming linear growth) within the South Los Angeles CPA 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 the 2020-2045 RTP/SCS indicate less growth in population, housing, and employment for the South Los Angeles CPA than the Original Project data interpolated for the year 2020.

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 the Modified Project involves new significant impacts or substantially more severe

impacts related to park services beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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

***2017 FEIR***

The expected population is anticipated to increase the demand for library services and resources of the Los Angeles Public Library (LAPL) System. Because the Original Project does not include any specific feature or development project that would include library facilities, a decrease in the demand for library services would not occur.

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 Original Project, 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 Original Project 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, due to the proposed zoning changes in the Slauson Subareas of the South and Southeast Los Angeles CPAs, the Slauson Corridor TNP would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. The Slauson Corridor TNP would not result in changes to growth in the West Adams-Baldwin Hills-Leimert CPA. Nonetheless, the Slauson Corridor TNP could increase incrementally the demand for library services in the South Los Angeles and Southeast Los Angeles CPAs. The Slauson Corridor TNP Addendum determined that the LAPL's current level of service could not accommodate the demographic increase expected under the Original Project. 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Original Project determined that the LAPL's current level of service could not accommodate the demographic increase expected under the Original Project. However, as previously discussed, any public service facility 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, proposed changes under the Modified Project would not involve new significant or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 other public facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 other public facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

The Original Project estimated greater population, housing, and significantly greater employment numbers within the CPAs than the actual conditions indicated by the 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. 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 other public facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are required.

### F. Conclusion

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

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## 3.16 RECREATION

The EIR addressed impacts to parks in the Public Services section of the Original Project.

| 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 | No | No | No | No |

### A. Impact Determination in the Certified EIR

***2017 FEIR***

Under the Original Project, all existing parks and recreational facilities in the CPAs remain. However, the Original Project allocates 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 Original Project does not constitute a commitment to any project-specific construction; however, the Reasonably Expected Development from the Original Project results in development throughout the CPAs, with more intense development expected particularly within the Active Change Areas. The population growth associated with the Original Project 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 Original Project cannot be accommodated. Additionally, implementation of the Original Project 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 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, 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 Original Project 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 Original Project.

Conclusion. Implementation of the Original Project increases the population and dwelling units in the CPAs which would in turn increase the use 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 Original Project resulted 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.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP 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. The additional allowable population growth estimated under the Slauson Corridor TNP could therefore increase incrementally the demand for park space and lead to a further deficit of parks and recreational facilities in the CPAs. It is not anticipated that the incremental increase in population and employment would result in the need for new or expanded recreational facilities. No new parks or recreational facilities are planned or proposed under the Slauson Corridor TNP. 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. Although any future development under the Slauson Corridor TNP would be subject to the Quimby Act and in lieu development fees, as with the Original Project, the Slauson Corridor TNP would result in a *significant and unavoidable* impact related to increased population and anticipated use and deterioration of existing parks and recreational facilities. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. No new parks or recreational facilities are planned or proposed under the Modified Project, and any future development proposed under the Modified Project would be subject to the Quimby Act and in lieu development fees. Therefore, proposed changes under the Modified Project would not involve new significant or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum; impacts would remain *significant and unavoidable*. 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 parks and recreational facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

There are no new circumstances involving new significant impacts or substantially more severe impacts relative to the increased use of existing parks or other recreational facilities that would be relevant to the analysis of the Modified Project. 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 parks and recreational facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 CPIO. The Original Project and Slauson Corridor TNP estimated greater population, housing, and significantly greater employment numbers within the CPIO than the actual conditions indicated by the US Census data. Because growth was slower than previously estimated, there would be 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 the Modified Project involves new significant impacts or substantially more severe impacts related to agricultural resources, timberland or forestland beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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? | Less than Significant | No | No | No | No |

## A. Impact Determination in the Certified EIR

### *2017 FEIR*

As discussed above, implementation of the Original Project increases demand for parkland in the CPAs, thereby exacerbating an existing deficit in parks and recreational facilities in the CPAs. As shown in Table 1.16-1 in the Original Project, 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 Original Project 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 Original Project. 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. While the Original Project did not include recreational facilities it did identify that there would be a significant impact on existing facilities (see discussion above). Generally, development of any new parks in the CPAs would be expected to have impacts consistent with impacts generally analyzed in the 2017 FEIR. 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would incrementally increase the demand for parklands in the CPAs and therefore exacerbate the existing deficit in parks and recreational facilities in the CPAs. No new parks or recreational facilities are planned or proposed under the Slauson Corridor TNP. As with the Original project, future development under the Slauson Corridor TNP would be subject to the Quimby Act and in lieu development fees. Any development of new parks was continued to be considered speculative. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. No new parks or recreational facilities are planned or proposed under the Modified Project, however any future development under the Modified Project would be subject to the Quimby Act and in lieu development fees. Nonetheless, 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 related to related to parks and recreational facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 parks and recreational facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. The Original Project 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. 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 parks and recreational facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 201FEIR or Slauson Corridor TNP Addendum. No new mitigation measures.

### F. Conclusion

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

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## 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? | Less than significant[26] | No | No | No | No |

### A. Impact Determination in the Certified EIR

***2017 FEIR***

The Original Project 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 Original Project 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 Original Project are consistent with several regionally-adopted land use plans, policies, and regulations that include transportation strategies.

The Original Project includes a Transportation Improvement and Mitigation Plan (TIMP) for each Community Plan that provides recommendations to guide future transportation-related decisions in the CPAs consistent with regional, state and local regulatory plans. The Original Project 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 Original Project 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 Original Project, 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 and would be less than the existing per capita VMT in both CPAs.[27] Thus, the Original Project would result in a reduction of VMT and impacts to the circulation system would be less than significant.

26 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.

27 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.

Based on the above, the Original Project 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 Original Project would be *less than significant*.

Implementation of the Original Project would create new housing and employment opportunities, mostly in areas around transit identified for mixed-use, in accordance with the Framework Element. Under the Original Project, 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 Original Project are consistent with several regionally adopted land use plans, policies, and regulations that include transportation and multi-modal strategies.

The Original Project was found to 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 are required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, transportation impacts using the new Citywide Travel Demand Model (New Model) were updated to align with the 2016 SCAG RTP/SCS projections. The Slauson Corridor TNP was found to continue to enhance access to transit stations to encourage transit use and active transportation through the creation of new compatible land use (i.e., residential and non-residential) and was found to not conflict with any program, plan, ordinance or policy addressing the circulation system. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

The Modified Project would not substantially change the development assumptions as compared to those evaluated using the New Model in the Slauson Corridor TNP Addendum. The Modified Project would continue 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. The proposed changes under the Modified Project would not result in new significant or substantially more severe impacts beyond what was identified in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 public transportation, bicycle, and pedestrian facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 memorandum evaluating use of the New Model (Traffic Model Technical Memorandum, Appendix C of the Slauson TNP Addendum), 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 of the Modified Project as compared to traffic impacts of the Approved Plans in this Addendum. 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 the Modified Project involves new significant impacts or substantially more severe impacts related to public transportation, bicycle, and pedestrian facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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)? | Less than Significant | No | No | No | No |

### A. Impact Determination in the Certified EIR

***2017 FEIR***

Implementation of the Original Project 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 EIR, with the implementation of the Original Project, the per capita VMT

was anticipated to be reduced (EIR existing [2010], compared to 2035) in both CPAs.[28] 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 Original Project was considered to have a *less than significant* on VMT (although no thresholds were specifically identified).

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, and as noted above, the analysis of traffic impacts as a result of the Slauson Corridor TNP was evaluated based on the New Model. The VMT outputs from the New Model were reviewed to determine the per capita and per service population VMT under the Slauson Corridor TNP as compared to under the Original Project. VMT under both the Original Project and under the Slauson Corridor TNP were compared to the Citywide average VMT (per capita and per service population). The Slauson Corridor TNP Addendum found that Home-based Daily VMT per capita would be reduced under the Slauson Corridor TNP, as compared to under the Original Project. Daily VMT per Service Population was found to increase negligibly under the Slauson Corridor TNP, as compared to under the Original Project.

The City's threshold of significance is that a CPA must result in VMT that is 15 percent below the Citywide average. The VMT per capita and per service population of the CPAs under both the Slauson Corridor TNP and the Original Project was found to be below the City's thresholds. The Slauson Corridor TNP was found to result in similar VMT per capita and per service population as compared to under the Original Project. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Therefore, the Modified Project would result in similar VMT per capita and per service population as compared to under the Slauson Corridor TNP and both would result in *less than significant 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 the analysis of traffic impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

As discussed above, the City has identified a new threshold of significance for VMT impacts: that for Community Plans, VMT be 15 percent below the Citywide average. This new threshold is used in the analysis above. 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

28 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.

of new or more severe significant impacts related to the analysis of traffic impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. 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 the analysis of traffic impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

***2017 FEIR***

The Original Project did not introduce new streets or otherwise change the overall land use pattern in the CPAs. The Original Project plans for the reasonably expected future development for a portion of the City and did not constitute a commitment to any project-specific development. Furthermore, none of the regulations included in the Original Project promoted 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 uses were found to be *less than significant*.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

No roadway or other changes were included in the Slauson Corridor TNP. As further discussed in the Slauson TNP Addendum, none of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As with the Original Project and Slauson TNP the Modified Project does not introduce new streets or otherwise change the overall land use pattern in the CPA or increase hazards due to a design feature or incompatible uses. 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 increased hazards due to a design feature or incompatible use beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 increased hazards due to a design feature or incompatible use beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 increased hazards due to a design feature or incompatible use beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

**F. Conclusion**

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

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| 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

### *2017 FEIR*

Emergency response routes in the CPAs would be maintained in their existing locations and the Original Project did 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 are 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. The Original Project was found to 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 Fire Preemption System (FPS) 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.[29] 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 were required.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP was found to not alter any emergency routes in the CPAs and would not include any new streets. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

29 City of Los Angeles, S*afety Element of the Los Angeles City General Plan*, August 1996.

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

As with the Original Project and Slauson Corridor TNP, the Modified Project would not alter any emergency routes in the CPAs and would not include any new streets. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 to be a component of the analysis above. 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 emergency access beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 emergency access beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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## 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 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

#### *2017 FEIR*

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 Original Project could be located on a site with previously unknown tribal cultural resources. Therefore, there is potential that new development under the Original Project 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 Original Project, 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 Measure. Refer to Mitigation Measure **CR1** under Section 3.5, Cultural Resources of this Addendum.

Level of Significance After Mitigation. Less than significant.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP would increase the allowable intensity, density, and/or types of development within the South and Southeast Los Angeles CPAs. Construction under the Slauson Corridor TNP would involve ground-disturbing activities of similar intensity to those under the Original Project, and therefore has a similar potential to encounter unknown tribal cultural resources. As with the Original Project, without implementation of Mitigation Measure **CR1**, the development proposed under the Slauson Corridor TNP would result in potentially significant impacts related to Tribal Cultural Resources. However, with incorporation of Mitigation Measure **CR1,** impacts would be *less than significant.* None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. Construction under the Modified Project would involve ground-disturbing activities of similar intensity to those under the Original Project and result in similar impacts to tribal cultural resources. As with the Original Project and Slauson Corridor TNP, 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 tribal cultural resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 tribal cultural resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

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

### F. Conclusion

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

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# 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

### *2017 FEIR*

Future development under the Original Project 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 Original Project 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 Original Project.

Reasonably expected development from the Original Project 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 LAFD 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 Original Project 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 Original Project 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 Original Project 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 3 percent in the South Los Angeles CPA and by 5 percent in the Southeast Los Angeles CPA. Impacts to telecommunication facilities were not analyzed in the 2016 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 Original Project represents an incremental increase in the City's total wastewater treatment capacity.

Implementation of the Original Project 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 Original Project 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 Original Project. The Original Project 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 Original Project 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 Original Project were found to be *less than significant*.

Mitigation Measures. No mitigation measures were required.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Original Project 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 Slauson Corridor TNP. Due to the proposed zoning changes in the Slauson Subareas of the South and Southeast Los Angeles CPAs, the Slauson Corridor TNP would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. The Slauson Corridor TNP would not result in changes to growth in the West Adams-Baldwin Hills-Leimert CPA. The Slauson Corridor TNP could therefore increase incrementally the demand for new or expanded utilities systems in the South and Southeast CPAs. **Table 3-4** 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 Slauson Corridor TNP. The Slauson Corridor TNP does not anticipate impacts related to the construction of new or expanded telecommunication facilities.

As shown in the table below, compared to the Original Project, the Slauson Corridor TNP is anticipated to result in negligible changes to utilities.

As under the Original Project, all development under the Slauson Corridor TNP would be required to comply with the same federal, state, and local utilities and service systems regulations that were discussed in the 2016 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 Slauson Corridor TNP. LADWP would continue to upgrade sewer lines through capital improvement projects throughout the City system. The Slauson Corridor TNP would result in an incremental increase in the amount of solid waste disposal generated under the Original Project. The estimates contained in the Original Project 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. The Slauson Corridor TNP is not anticipated to result in the need for new or expanded telecommunication facilities.

Similar to the Original Project, the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. No new water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities are planned or proposed under the Modified Project.

As under the Original Project, 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 2016 EIR. In-place water conservation measures, programs, and policies, as well as ongoing sewer line and water treatment capital improvements projects throughout the City system, may result in a lower net demand for water in the CPIO than anticipated. Construction under the Modified Project is required to divert at least 50 percent of generated solid waste 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 Original Project and Slauson Corridor, 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.

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 related to the construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

Refer to Section 3.14, Population and Housing, for discussion of a comparison of population, housing, and employment forecasts under the 2020 Census, the 2020 growth forecast interpolated from the Original Project, 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 may overestimate projections for population and employment growth and therefore estimated conservative projections for the consumption of water, electricity, and natural gas, and the generation of solid waste and wastewater. As previously discussed, the Modified Project is not anticipated to result in growth beyond what can be accommodated by existing utilities. 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 the construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

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

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| 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

### *2017 FEIR*

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 Original Project, 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 Original Project 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 Original Project 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 Original Project 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 Original Project are implemented. Moreover, the impacts to water demand for future water resources are minimized as implementation of the Original Project would occur incrementally through the year 2035. In addition, the Original Project responded 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 Original Project were found to be *less than significant.*

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, due to the proposed zoning changes in the Slauson Subareas of the South and Southeast Los Angeles CPAs, the Slauson Corridor TNP would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the Original Project. 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, water demand under the Slauson Corridor TNP would slightly decrease compared to the Original Project. The Slauson Corridor TNP would not change citywide forecasts for population growth.

As with the Original Project, the Slauson Corridor TNP would minimize impacts to water demand for future water resources through incremental implementation through the year 2035. In addition, the Slauson Corridor TNP 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 Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. As under the Original Project, development under the Modified Project would be incrementally implemented and growth would be most concentrated within TOD Subareas, which would result in more water efficiency. 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 demand for future water resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

DWP is forecasting adequate water supply for the City's population. 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 water demand for future water resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 Original Project), 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 Original Project, 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 the Modified Project involves new significant impacts or substantially more severe impacts related to water demand for future water resources beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

### *2017 FEIR*

Future development under the Original Project 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 Original Project was estimated to increase by 15 percent compared to 2010. In the Southeast Los Angeles CPA, wastewater generation was 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 mgd. When compared to the maximum capacity of all four treatment plants, wastewater generation of the two CPAs under the Original Project 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 Original Project includes 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 Original Project 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 or expanded wastewater facilities were found to be *less than significant.*

Mitigation Measures. No mitigation measures were required.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, the Slauson Corridor TNP is anticipated to result in an incremental increase in wastewater disposal compared to the Original Project. As with the Original Project, wastewater generation within the two CPAs under the Modified Project would be minor in the context of the City's total wastewater treatment capacity. Development under the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017

FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

Wastewater generation under the Modified Project would be minor in the context of the City's total wastewater treatment capacity. 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 related to construction of new or expanded wastewater facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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% of the water flowing by 2035. Under this program, HTP would produce up to 170 million gallons per day (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.

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 construction of new or expanded wastewater facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. 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 construction of new or expanded wastewater facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

### F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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

***2017 FEIR***

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 Original Project was 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 Original Project was 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 Original Project 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 Original Project were found to be *less than significant*. No mitigation measures were required.

Mitigation Measures. No mitigation measures were required.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson TNP Addendum, solid waste generation is driven by demographic changes such as an increase in population, employment, and land use development. The Slauson Corridor TNP would accommodate incrementally increased population, housing, and employment beyond what was evaluated in the 2017 FEIR. The Slauson Corridor TNP would not result in changes to growth in the West Adams-Baldwin Hills-Leimert CPA. The Slauson Corridor TNP would result in a negligible increase in solid waste disposal compared to the Original Project 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 Slauson Corridor TNP as compared to the Original Project. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. 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 facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

The Original Project 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 3-4** 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 Original Project, 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 CPIO have substantially increased their remaining capacity by 8 percent, 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.

| TABLE 3-4: SOLID WASTE FACILITIES SERVING THE CITY OF LOS ANGELES | | | | |
|---|---|---|---|---|
| | | 2020 Annual Reporting vs. 2014 Annual Reporting | | |
| Facility Name | Location | 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 Recycling and Recovery, 2022 | | | | |

As a result of the increased permitted capacity of the solid waste facilities servicing the Project Area, these facilities are anticipated to accommodate the solid waste disposal under the Modified Project. 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 solid waste facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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% by 2030 and to increase the proportion of waste products and recyclables productively reused and/or repurposed within the County to at least 50% by 2035. The allowable development under the Approved Plans is not anticipated to prevent the City from reaching its solid waste recycling and reduction targets. 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 solid waste facilities beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are warranted.

## F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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: | | | | | |
| (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

### *2017 FEIR*

Implementation of the Original Project 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 Original Project does 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 Original Project 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 Original Project 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 Original Project 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.

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson TNP Addendum, as with the Original Project, the incremental increase of development under the Slauson Corridor TNP 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. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. All 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 compliance with federal, state, and local statutes and regulations related to solid waste beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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

As identified in **Table 3-4**, 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those already identified in the 2017 FEIR and Slauson Corridor TNP Addendum. 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 compliance with federal, state, and local statutes and regulations related to solid waste beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### D. Any New Information Requiring New Analysis or Verification?

As discussed, 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 the Modified Project involves new significant impacts or substantially more severe impacts related to compliance with federal, state, and local statutes and regulations related to solid waste beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum

### E. Certified EIR's Mitigation Measures Addressing Impact

No mitigation measures were identified in the 2017 FEIR or Slauson Corridor TNP Addendum. No new mitigation measures are required.

## F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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

### *2017 FEIR*

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)[30], 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 Transportation[31]. 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* Air Quality impact 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 **CR2** would establish protocols for the handling of prehistoric, archaeological, tribal cultural and paleontological resources encountered during construction activities and would reduce these impacts to a less than significant level.

[30] The City has updated their approach to thresholds and shade and shadow analyses; such impacts are generally no longer considered significant.

[31] 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.

Mitigation Measure **N1** would reduce noise-related construction impacts but not to a to 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 to 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.[32]

Mitigation Measures. Mitigation Measures **AQ1**, **CR1**, **CR2**, **HM1, N1, N2, N3**, and **N4**.

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP would accommodate an incremental increase in the intensity, density, in the South and Southeast Los Angeles CPAs. The Slauson Corridor TNP was not anticipated to substantially change impacts as compared to what was analyzed in the 2017 EIR.

With respect to construction air quality impacts, recent studies of project air quality impacts are not showing significant impacts. Nonetheless, to reflect the potential for multiple projects in the plan areas and in the interests of being conservative, the Slauson Corridor TNP Addendum continued to consider emissions during construction to be significant.

As with the Original Project, the Slauson Corridor TNP 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 Slauson Corridor TNP would have no impact to riparian habitats or other sensitive natural communities. Development under the Slauson Corridor TNP would be required to comply with federal, state, and local regulations related to the protection of wildlife, habitats, ecosystems, and species. Nonetheless, even with implementation of the mitigation measures listed above, the Slauson Corridor TNP was found to result in *significant and unavoidable* impacts related to Cultural Resources (historic resources), Noise (construction noise and vibration), and Recreation (deterioration of existing parks). None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and no new information of substantial importance, which was not known and could not

[32] 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 theses 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.)

have been known with the exercise of reasonable diligence at the time the 2017 FEIR was certified. No mitigation measures were required.

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

As discussed in Chapter 2, Project Description, the Modified Project would expand residential subarea protections and shift the allowable intensity of development in certain TOD Subareas in the South Los Angeles CPIO. However, as explained in Chapter 2, the 2017 FEIR assumptions (as refined in the Slauson Corridor TNP Addendum) regarding reasonably anticipated development do not change. The Modified Project is not anticipated to substantially change impacts compared to what was analyzed in the 2017 FEIR and Slauson TNP Addendum.

Construction emissions continue to be considered significant under the Modified Project despite the recent studies of air quality impacts of development projects not showing significant impacts. This conservative analysis reflects the potential for multiple projects in the plan area.

As with the Original Project, 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. 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. Therefore, the proposed changes under the Modified Project would not involve new significant impact. Impacts identified for the Original Project 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. 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 beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

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 being undertaken that would require major revisions to the 2017 FEIR due to the involvement of new or more severe significant impacts related beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 Original Project was certified related to one or more significant effects related to wildlife species and habitats, plant or animal community ranges, endangered species, or historical and cultural resources. There is no new information requiring new analysis or verification.

## E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **AQ1**, **CR1**, **CR2**, **HM1**, **N1**, **N2**, **N3**, and **N4** would address impacts. No new mitigation measures are warranted.

## F. Conclusion

The Modified Project would not result in any of the conditions set forth in PRC 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:** | | | | | |
| (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

### *2017 FEIR*

As noted above the Original Project resulted in significant adverse impacts as noted above. There are no impacts under the Original Project 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).

### *Slauson Corridor TNP Addendum*

As further discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP would continue to result in similar impacts as compared to the Original Project. The Slauson Corridor TNP was therefore found to have cumulatively considerable impacts which are *significant and unavoidable* as noted above. None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were found to be feasible.

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

The Modified Project would result in similar impact as compared to those identified for the Original Project and Slauson Corridor TNP. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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 Modified Project continues to consider emissions during construction to be significant. 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### 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. New traffic modeling and air quality modeling tools have been developed and 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 Slauson Corridor TNP. However, 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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. Certified EIR's Mitigation Measures Addressing Impact

Mitigation Measures **AQ1, CR1, CR2 HM1**, **N1**, **N2**, **N3**, and **N4** would address impacts. No new mitigation measures are warranted.

### F. Conclusion

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

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| 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

### *2017 FEIR*

The Original Project 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.[33]

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 be *less than significant*.

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 Original Project. 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,

[33] The City has updated their approach to thresholds and shade and shadow analyses; such impacts are generally no longer considered significant.

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 Original Project was also considered to have a significant impact on roadway and freeway congestion (delay), however, these impacts are no longer considered significant under CEQA. [34]

Even with incorporation of the mitigation measures listed above, the Original Project would directly and indirectly cause substantial adverse effects on human beings which were found to be *significant and unavoidable.*

***Slauson Corridor TNP Addendum***

As further discussed in the Slauson Corridor TNP Addendum, the Slauson Corridor TNP was considered to result in direct and indirect impacts. As with the Original Project, even with incorporation of mitigation measures**,** the Slauson Corridor TNP would continue to directly and indirectly cause similar substantial adverse effects on human beings which are *significant and unavoidable.* None of the proposed changes were determined to result in new significant impacts or substantially more severe impacts beyond what was identified in the 2017 FEIR, none of the proposed changes involved any new circumstances that would require major revisions to the 2017 FEIR, and 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. No additional mitigation measures were required.

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

As with the Original Project and Slauson Corridor TNP, the Modified Project would result in direct and indirect impacts. Even with incorporation of Mitigation Measures **AQ1**, **CR1**, **CR2, HM1**, and **N1** through **N4**, the Modified Project would continue to directly and indirectly cause substantial adverse effects on human beings which are considered significant and unavoidable, but in a similar manner as the Original Project and Slauson Corridor TNP. Nonetheless, 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 -- beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 in the 2017 FEIR and Slauson Corridor TNP Addendum.

**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 potential adverse effects on the environment. 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

[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.

new significant impacts or substantially more severe impacts beyond what was previously analyzed in the 2017 FEIR and Slauson Corridor TNP Addendum.

### E. EIR's Mitigation Measures Addressing Impact

Mitigation Measures **AQ1**, **HM1**, **N1**, **N2**, **N3**, and **N4** would address impacts. No new mitigation measures are warranted.

### F. Conclusion

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

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# 4 CONCLUSION

As demonstrated by the discussion above, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Subsequent or Supplemental EIR would occur.

# EXHIBIT D.1:

# Council Motion

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

**EXHIBIT D.1**

PLANNING & LAND USE MANAGEMENT

# MOTION

On November 16, 2008, Ordinances No. 180218 and 180219 (Council File No 06-1666) became effective establishing the *North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) District* in the area generally bounded by the 10 Freeway, 110 Freeway, Martin Luther King Boulevard, and Normandie Avenue, to promote well planned housing to meet the needs of both college student housing and the needs of the surrounding community.

The North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay District was established as a land use regulatory tool to protect affordable housing units in the surrounding community by requiring a Conditional Use Permit for the construction or reconfiguration of any one family dwelling or multiple family dwelling units that create at least one dwelling unit with five or more habitable rooms.

Since its implementation twelve years ago, there continuous to be a loss of affordable housing within the boundaries of the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay District. As such, community members and other civic stakeholders are seeking to understand why despite the implementation of land use controls, there continues to be a loss of affordable housing and an overconcentration of student housing near the University Park/Expo Park community.

**I THEREFORE MOVE** that the Council instruct the Planning Department, in consultation with the City Attorney, to prepare a report with recommendations relative to the loss of affordable housing and the overconcentration of student housing near the University Park/Expo Park community as follows:

(1) Determine how existing city regulations, including Small Lot Subdivisions, can be used to promote housing that serves households of different sizes and income levels in Council District 8's north area neighborhoods.

(2) Expand the *North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay* (Zoning Information File No. 2397) boundary area to extend west to Western Avenue and south to Martin Luther King Boulevard, and define "project" to include any one or multiple family dwelling with four or more habitable rooms, and exclude projects defined as co-living or student housing.

(3) Determine what land use tools, including but not limited to a Specific Plan, could address issues of affordability, design, and housing types to balance the need for family-sized affordable units and rehabilitation of historic homes with student housing and co-living facilities.

(4) Work with community groups and institutional stakeholders such as but not limited to, the University of Southern California, to analyze and address these issues.

**PRESENTED BY:** _____
**MARQUEECE HARRIS DAWSON**
**Councilmember, 8th District**

SEP 3 0 2020

**SECONDED BY:** _____
BOB BLUMENFIELD (verbal)
Councilmember, 3rd District

rrm

**File No. 20-1265**

PLANNING AND LAND USE MANAGEMENT (PLUM) COMMITTEE REPORT relative to recommendations for the North University – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) Supplemental Use District (SUD), and the loss of affordable housing and overconcentration of student housing near the University of Southern California (USC)/Exposition Park community.

Recommendations for Council action:

1. APPROVE the recommendations as detailed in the Department of City Planning (DCP) report, dated December 2, 2021, attached to the Council file, relative to the North University – Exposition Park – West Adams NSO SUD, and the loss of affordable housing and overconcentration of student housing near the USC/Exposition Park community, in response to Motion (Harris-Dawson – Blumenfield) adopted by the Council on January 12, 2021, to include the following:

    a. A two-phased approach that expedites a work program with a target completion of 12 months in the first phase, and an additional 30 to 40 months for the second phase.

    b. Two DCP staff members will be required, as well as collaboration with the Los Angeles Housing Department (LAHD) and the Los Angeles Department of Building and Safety (LADBS).

    c. Additional staff resources may be evaluated as the City departments coordinate the implementation of the work program.

2. INSTRUCT the DCP, with the assistance of the LAHD and LADBS, in consultation with the City Attorney, to prepare a report with recommendations and data analysis, and any Ordinance(s) to implement all recommended land use regulations and the necessary environmental clearance; and, to conduct all necessary public hearing(s) and community outreach.

Fiscal Impact Statement: None submitted by the DCP. Neither the City Administrative Officer nor the Chief Legislative Analyst has completed a financial analysis of this report.

Community Impact Statement: Yes

For: Empowerment Congress North Area Neighborhood Development Council

Summary:
At a regular meeting held on December 7, 2021, the PLUM Committee considered a DCP report relative to recommendations for the North University – Exposition Park – West Adams NSO SUD, and the loss of affordable housing and overconcentration of student housing near the USC/Exposition Park community, in response to Motion (Harris-Dawson – Blumenfield) adopted by the Council on January 12, 2021. DCP staff presented an overview of the matter. After providing an opportunity for public comment, the Committee recommended to approve the recommendations as detailed in the DCP report dated December 2, 2021, to include a two-phased approach that expedites a work program with a target completion of 12 months in the first phase, and an additional 30 to 40 months for the second phase; two DCP staff members will be required, as well as collaboration with the LAHD and the LADBS; and, additional staff resources may be evaluated as the City departments coordinate the implementation of the work program. The Committee also recommended to instruct the DCP, with the assistance of the LAHD and LADBS, in consultation with the City Attorney, to prepare a report with recommendations and data analysis, and any Ordinance(s) to implement all recommended land use regulations and the necessary environmental clearance; and, to conduct all necessary public hearing(s) and community outreach. This matter is now submitted to the Council for consideration.

Respectfully Submitted,

PLANNING AND LAND USE MANAGEMENT COMMITTEE

| **MEMBER** | **VOTE** |
|---|---|
| HARRIS-DAWSON: | YES |
| CEDILLO: | YES |
| BLUMENFIELD: | YES |
| RODRIGUEZ: | YES |
| LEE: | ABSENT |

AXB
20-1265_rpt_PLUM_12-07-21

**-NOT OFFICIAL UNTIL COUNCIL ACTS-**

# EXHIBIT D.2:

# Report to Council PLUM Committee

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

EXHIBIT D.2

DEPARTMENT OF
CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

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LISA M. WEBBER
DEPUTY DIRECTOR

December 2, 2021

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

**NORTH UNIVERSITY PARK-EXPOSITION PARK-WEST ADAMS NEIGHBORHOOD STABILIZATION OVERLAY SUPPLEMENTAL USE DISTRICT – DEPARTMENT OF CITY PLANNING REPORT BACK; CF 20-1265**

On January 12, 2020, the Los Angeles City Council adopted a motion (CF 20-1265) instructing the Department of City Planning (DCP) to report to the Planning and Land Use Management (PLUM) Committee with recommendations relative to the North University-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) Supplemental Use District (SUD), including working definitions of student housing, co-living facility, and naturally occurring affordable housing; strategies to address the loss of naturally occurring affordable housing and the overconcentration of student housing/co-living facilities; and an analysis of affordable housing production within the NSO SUD.

**Background**

In 2008, the NSO SUD was established in the North University-Exposition Park-West Adams neighborhood by Ordinance No. 180218. The North University-Exposition Park-West Adams NSO SUD is generally bounded by the 10 Freeway to the north, the 110 Freeway to the east, Martin Luther King Boulevard to the south, and Normandie Avenue to the west, fully incorporating the neighborhoods surrounding the University of Southern California (USC) campus. Projects in the NSO SUD are defined in LAMC 13.12 and subject to a Conditional Use Permit (CUP) process,

as outlined in LAMC 12.24 W.52, that requires projects to provide additional parking and meet certain findings such as a requirement that there not be a detrimental concentration of large scale, campus serving housing within close proximity if the project includes units with 5 or more habitable rooms.

The purpose of the North University-Exposition Park-West Adams NSO SUD is to broadly address negative impacts resulting from new multi-habitable room projects in neighborhoods nearby the USC campus, such as parking shortages, oversized development, and poorly designed residential buildings. Per LAMC 13.12, the radius of an NSO SUD is limited to a maximum one-mile radius (approximately 5,280 feet) from the physical boundaries of a college or a university – though the precise boundary may be adjusted for urban features such as topography, freeways, streets, or highways. In general, the NSO SUD was created to ensure development associated with student housing for college campuses is compatible with the residential neighborhoods immediately surrounding these campuses.

In response to the motion, preliminary research on existing zoning and conditions are included as Exhibits. Exhibit A contains an in-depth discussion of the existing conditions and zoning of the NSO SUD area as well as the two expansion areas identified by the council motion, labeled Study Area A and Study Area B. Exhibit B is a reference map which further highlights the additional zoning overlays and land use policies applicable to the areas, including Historic Preservation Overlay Zones, Specific Plans, South Los Angeles Community Plan Implementation Overlay (CPIO) subareas, and the Transient Oriented Communities (TOC) Incentive Program. In general, the interior residential pockets of the study areas have fewer regulations that pertain to design standards while also allowing for more density than what is currently built out. This has led to mostly by-right residential development that is sometimes incompatible with the existing neighborhood character. The combination of existing conditions and current zoning has also compounded concerns about affordable housing, parking and other issues as further discussed in this report.

**Discussion**

The Council Motion instructed DCP to report on strategies to expand the existing North University-Exposition Park-West Adams NSO SUD to a larger geographic area to the west and to the south of the existing boundaries to address issues related to parking, impacts from student housing and neighborhood compatibility from new developments. However, planning staff's analysis of the NSO program demonstrated that expanding the existing NSO SUD alone will not address the root causes of these issues. Furthermore, any expansion of the NSO SUD would be limited to a one-mile radius pursuant to LAMC 13.12 B; while Study Area A is generally within the one-mile radius of a college or university, Study Area B exceeds the one-mile radius requirement (if compliant, Study Area B would end at Vernon to the south).

The NSO currently requires development projects to go through a discretionary Conditional Use Permit (CUP) process for projects with units that include 5 or more habitable rooms. Nine cases

have been approved under this process since its inception in 2008 (Exhibit C). Staff has identified some unintended consequences of the NSO process related to project design, including residential units that: a) only provide smaller 1 or 2 bedrooms, b) eliminate shared living spaces such as living rooms in order to include more bedrooms, and/or c) contain extremely large bedrooms. Because these developments include units that are designed to have less than 5 habitable rooms, they are not considered "Projects" under the NSO and therefore are not subject to the CUP process. The emergence of these housing typologies affects the development pattern in this area, raising concerns about the type of residential buildings that are being constructed in this neighborhood. These concerns have been confirmed by the North Area Neighborhood Development (NANDC) Taskforce - a group of community leaders and stakeholders that Planning staff was directed to work with to collect comments and recommendations.

*Initial Outreach*

In conversations with Council District 8 and 9 staff and community stakeholders from the NANDC Taskforce, Planning staff heard that development pressures in the immediate area were having a negative impact on the built environment and the quality of life for existing residents. Participants of these meetings expressed concerns about affordable housing, demolitions, displacement, parking, and project design. Specific concerns include the loss of naturally occurring affordable housing, that new development was focused on serving the student population, that stable single-family neighborhoods or low-density neighborhoods were being demolished and replaced with out-of-scale and incompatible development, and that the community is experiencing parking impacts resulting from the increased intensity of development.

*Affordable Housing Production and/or Preservation*

The neighborhoods in the NSO SUD and the study areas face a shortage of housing at levels that are affordable to a majority of existing residents. These areas may have an existing supply of naturally occurring affordable housing (NOAH), which typically refers to older residential rental properties that maintain low rents without government subsidy. These units are particularly susceptible to losing their affordability after being sold and rehabilitated. Thus, the redevelopment of NOAH units and rising rents of newer units are contributing factors to the displacement of longtime residents, families, and other multi-unit households of the area.

*Design and Neighborhood Character*

While much of the NSO SUD area and the study areas are zoned for multi-unit residential development, there is a prevailing single-family residential character. New multi-unit infill development is occurring by-right, conforming to the general plan land use designation and the corresponding zoning. This difference between the existing built environment and what is allowable per zoning creates dissonance between the prevalent neighborhood scale and design and the types of multi-unit projects that are being developed. These new multi-unit developments may be designed to maximize rentable square footage and may not necessarily prioritize design compatibility with existing adjacent single-family homes. A majority of the interior residential pockets in the NSO SUD and study areas do not fall within a CPIO subarea or other overlays that regulate design.

*Parking and Mobility*
Parking shortages, lack of access to first mile last mile connections, and limited high quality mobility options are ongoing issues of significant concern in the NSO SUD and the study areas, where older housing stock may have limited on-site parking and where multi-generational or overcrowded households may exist. Parking shortages are further exacerbated by projects that benefit from reduced parking incentives under programs such as TOC or the Density Bonus (DB) state law.

*Affordable Housing Data and Definitions*
As instructed by Council, the Department also analyzed affordable housing unit production via the TOC Program and Small Lot Subdivisions entitlements (Exhibit D). The data revealed that 24% of TOC discretionary affordable units approved citywide were in the South Los Angeles Community Plan Area with 4% in the NSO area. By-right TOC permit applications, however, accounted for about 14% of the citywide TOC affordable units approved in South Los Angeles with fewer than a dozen TOC tier verification applications originating from the NSO area. Only one Small Lot Subdivision case in the NSO area, which rendered one affordable unit, was found as part of the analysis.

Affordable housing produced under the Density Bonus program and the South Los Angeles CPIO were also examined. Of the total number of affordable units approved citywide under the Density Bonus program, about 0.5% are located in the NSO area and 2.5% are located in the South Los Angeles Community Plan area. Only one project in 2021 has used the CPIO bonus incentive system; because applicants can utilize either TOC, DB, or CPIO for affordable housing incentives, TOC tends to offer the maximum benefits. These numbers suggest that TOC is the main driver of affordable housing production in this area which can be attributed to its proximity to the E Line (formerly the Expo Line) light rail system and other major transit routes.

Finally, while not defined in the LAMC, the Department examined existing policies and programs to develop working definitions for student housing, co-living facilities and naturally occurring affordable housing (NOAH) in Exhibit E. This background information can be used to shape the policy direction of a future work program, as described below.

**Work Program Recommendation**

The Department reviewed existing land uses and zoning tools applicable to the study area including the existing NSO SUD, the South Los Angeles CPIO, the TOC incentive program guidelines, and the potential future application of new "re:code" zones (comprehensive and modular zoning that will be introduced in Chapter 1A). To address the identified community issues, an initial analysis rendered four potential scenarios with varying degrees of timelines and scope. These scenarios were to: amend the NSO; amend the NSO and TOC, amend the South Los Angeles CPIO and TOC; or, conduct a comprehensive update to the South Los Angeles Community Plan and apply new re:code zones that could comprehensively streamline the multiple

overlays into modular zoning that addresses all the concerns brought forth. Creating a new specific plan in the area was also suggested by the community as an additional option to explore adding a 6th overlay to this specific geography.

These five initial considerations were analyzed while prioritizing timeline expectations, scope of work, and a sense of urgency to resolve ongoing community concerns. After receiving additional feedback from council offices and the NANDC taskforce to prioritize an expedited 12-month timeline, the Department developed a two-phase work program proposal. This two-phased approach prioritizes feasible aspects of a comprehensive work program within a 12-month timeline as requested by the council office, while reserving the remaining tasks for a subsequent 30 to 40-month work program:

| **First Phase** | **Second Phase** |
|---|---|
| Amend CPIO<br>• Apply CPIO subareas to the NSO SUD, Study Areas A and B - making them all eligible for CPIO provisions and process<br><br>Enhance CPIO Provisions<br>• Evaluate adding unit replacement requirements and tenant protections in collaboration with LAHD – see explanation below. | Community Plan Update<br>• Apply new re:code zones<br>• Refine TOC |

*First Phase*
The first phase acknowledges the immediate concerns related to compatible design and displacement and enlists the provisions in the existing South Los Angeles CPIO subareas by applying these provisions to additional areas in the NSO SUD study areas. This strategy would immediately address design and compatibility concerns as well as tenant protections by way of adding new provisions to the CPIO regarding unit replacement requirements and right of return.

The existing review process for projects which are zoned as part of a CPIO subarea requires projects to undergo an administrative review process conducted by the Department prior to the issuance of any permit for demolition, new construction, additions, alterations, change of use, signs, fences, walls, or site grading. In addition, all properties identified as potential or eligible historic resources undergo additional review. The development standards associated with each CPIO subarea can be applied to preserve neighborhood character by increasing the predictability of the development process and creating consistency in design and project outcomes. In addition, in order to address neighborhood housing stability, the CPIO text could be enhanced with tenant protections and covenanted unit replacement provisions for demolitions, conversions, remodels, and new construction – expanding the replacement provisions to address not only new

construction but also demolitions and conversions. The evaluation of tenant protections and unit replacement provisions requires ongoing collaboration and coordination with LAHD as the city evaluates consistent standards and implementation, while keeping in mind the priorities of the work program, staffing resources, and the effectuation of upcoming state legislation that might apply to ministerial (by-right) projects.

*Second Phase*

The second phase of the Department's recommendation is a comprehensive update to the South Los Angeles Community Plan. When the South Los Angeles Community Plan was adopted in 2018, "re:code" zones were not yet available. However, the new "re:code" zones or comprehensive update known as Chapter 1A of the LAMC - are currently underway. This approach would examine the entire plan area to tailor zoning regulations at the parcel level. This level of tailoring provides more flexibility than a stand-alone specific plan, which requires a contiguous area of parcels. In addition, this approach would allow for the opportunity to tailor development incentives, development standards, and community benefits, including the refinement of TOC provisions for the area.

*Additional Considerations*

Although there are concurrent citywide efforts to update the zoning code and housing policies; address affordable housing production and preservation; and revise transportation demand management strategies, the proposed work program recommendation would be focused on South Los Angeles. In addition, any work program must comply with state law including Senate Bill 330 (SB 330), which limits land use regulations that could potentially result in decreased intensity of development. Pursuant to SB 330, new zoning development standards that limit scale, size, and density requirements would need to be considered with accompanying upzones in order to offset the possible loss of housing production. The future work program would include continued public outreach with community stakeholders, including the established taskforce, further data analysis and background research, the retention of consultant services (if determined to be necessary), an evaluation of environmental review compliance, preparation of an open house and public hearing, and the preparation of a staff report and ordinance for consideration.

**Conclusion**

To address short-term priorities and long-term goals, the Department of City Planning recommends a two-phased approach that expedites a work program with a target completion of 12 months in the first phase and an additional 30 to 40 months for the second phase. This level of prioritization will require the resources of two staff members and continued collaboration with the Housing Department and the Department of Building and Safety. Additional staff resources may be evaluated as the city departments coordinate the most effective implementation of the work program as needed.

If you have any additional questions, please contact Senior City Planner Christine Saponara at (213) 410-7837 or City Planning Associate Fabiola Inzunza at (213) 978-1321.

Sincerely,



VINCENT P. BERTONI, AICP
Director of Planning

VPB:SB:HUL:CMS:JJK:FI

Enclosures
Exhibits A, B, C, D, and E

**Exhibit A: Existing Conditions and Zoning**

For the purposes of this report, the existing North University-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) Supplemental Use District (SUD) area, and each of the areas identified by the council motion, Study Area A and Study Area B, have been analyzed separately in order to account for the different existing conditions and zoning within each study area.

*Existing NSO SUD Area*
As depicted in the reference map Exhibit B, the existing NSO SUD is bounded by several existing zoning overlays and zoning tools. The northern portion of the district includes two Historic Preservation Overlay Zones (HPOZ), the Adams Normandie HPOZ and the University Park HPOZ both adopted in the year 2000 as well as the North University Park Specific Plan adopted in August 1983 (compliant with HPOZ regulations). The USC Specific Plan adopted in December 2012 covers the central east area of the district. In addition, the recent update to the South Los Angeles Community Plan in 2018, established the Community Plan Implementation Overlay (CPIO) which created 15 different thematic subareas; the NSO SUD contains six of these subarea designations: Neighborhood Serving Corridor, General Corridor, Transit Oriented Development (TOD) Low, TOD Medium, TOD High, Multi-Family, and Character Residential which are all mostly concentrated in the southwestern portion of the area. While the NSO SUD contains six CPIO subarea designations, please note that the majority of the residential pockets within the NSO SUD do not fall within a CPIO subarea - where the more obvious incompatible by-right development is occurring, and these areas would be candidates for CPIO expansion. A majority of the existing NSO SUD area is found within a designated tier as defined by the Transient Oriented Communities (TOC) Incentive Program Guidelines.

*Study Area A: CD-8 Portion*
Study Area A is located west of the existing North University-Exposition Park-West Adams NSO SUD boundaries, generally bounded by the I-10 Freeway on the north, Martin Luther King Boulevard on the south, the 110 Freeway on the east, and Western Avenue on the west. The residential General Plan Land Use designations for this study area generally range from Low Density Residential to Multiple Family Residential (Low II to Low Medium II) with corresponding zoning ranging from R1 to RD2. About 40% of the study area is zoned R2 and RD2. Within this study area, close to 90% of the existing stock of housing was built prior to 1978 which makes them subject to the Rent Stabilization Ordinance (RSO).

The portion of the study area located north of Jefferson Boulevard is almost entirely designated with a South Los Angeles CPIO Subarea, with a majority of the residential area designated as part of the Character Residential Subarea. The southern portion of the study area is flanked with TOD Subarea designations to the west along Western Avenue with some General Corridor Subarea designations around the rest of the perimeter.

Lots in Study Area A contain an average of 3 units. The existing zoning regulations allow for more density than what is built out on the ground today, prompting planning staff to re-examine various TOC projects, the Density Bonus law, and CPIO affordable housing incentives in this study area. While these incentives were designed to promote greater housing opportunities, issues such as the loss of naturally occurring affordable housing, the construction of out-of-scale by-right development, and small percentages of covenanted affordable units, coupled with a high demand for student housing, speak to a need to further refine incentives.

*Study Area B: CD-9 Portion*
Study Area B is generally bounded by Martin Luther King Jr. King Boulevard to the north, the 110 Freeway to the east, Normandie Avenue to the west and Gage Avenue to the south. The residential General Plan Land Use designations for this study area generally range from Low Density Residential (Low II and Low Medium I) to Multiple Unit Residential (Low Medium II to Medium) with corresponding zoning ranging from R1 to R3. About one third of the study area is zoned R2. Within this study area, about 90% of the existing stock of housing was built prior to 1978.

The corridors in this study area have been largely designated in the South Los Angeles CPIO as General Corridor Subareas with some major intersections designated as TOD Medium Subareas. Aside from two neighborhoods designated as Character Residential Subareas, the other residential areas have no subarea designations. Additionally, the corridor along Slauson Avenue and a portion of the eastern boundary surrounding the Metro J Line (formerly the Silver Line) is also part of the Slauson Corridor Transit Neighborhood Plan (TNP) study area. The Slauson TNP study area centers on the future Metro Rail-to-Rail Bike Path from Alameda to Crenshaw and focuses on neighborhoods with connection to transit and areas of significant employment activity.

Lots in Study Area B contain an average of 2.9 units with a significant portion of land eligible for TOC Tiers 2 and 3 incentives that apply to properties where 5 units or more are allowed by right. The parking incentives for TOC projects that are adjacent to or within overcrowded multi-residential areas presents an opportunity to re-examine and verify existing parking demand and utilization for areas lacking enough parking supply. While the major corridors are served by public transit, considerable feedback was received about the inadequate supply of parking for resident-owned vehicles used to support their economic livelihoods.

# Exhibit B: Neighborhood Stabilization (NSO) Overlay District Study Area

**Council File: 20-1265**

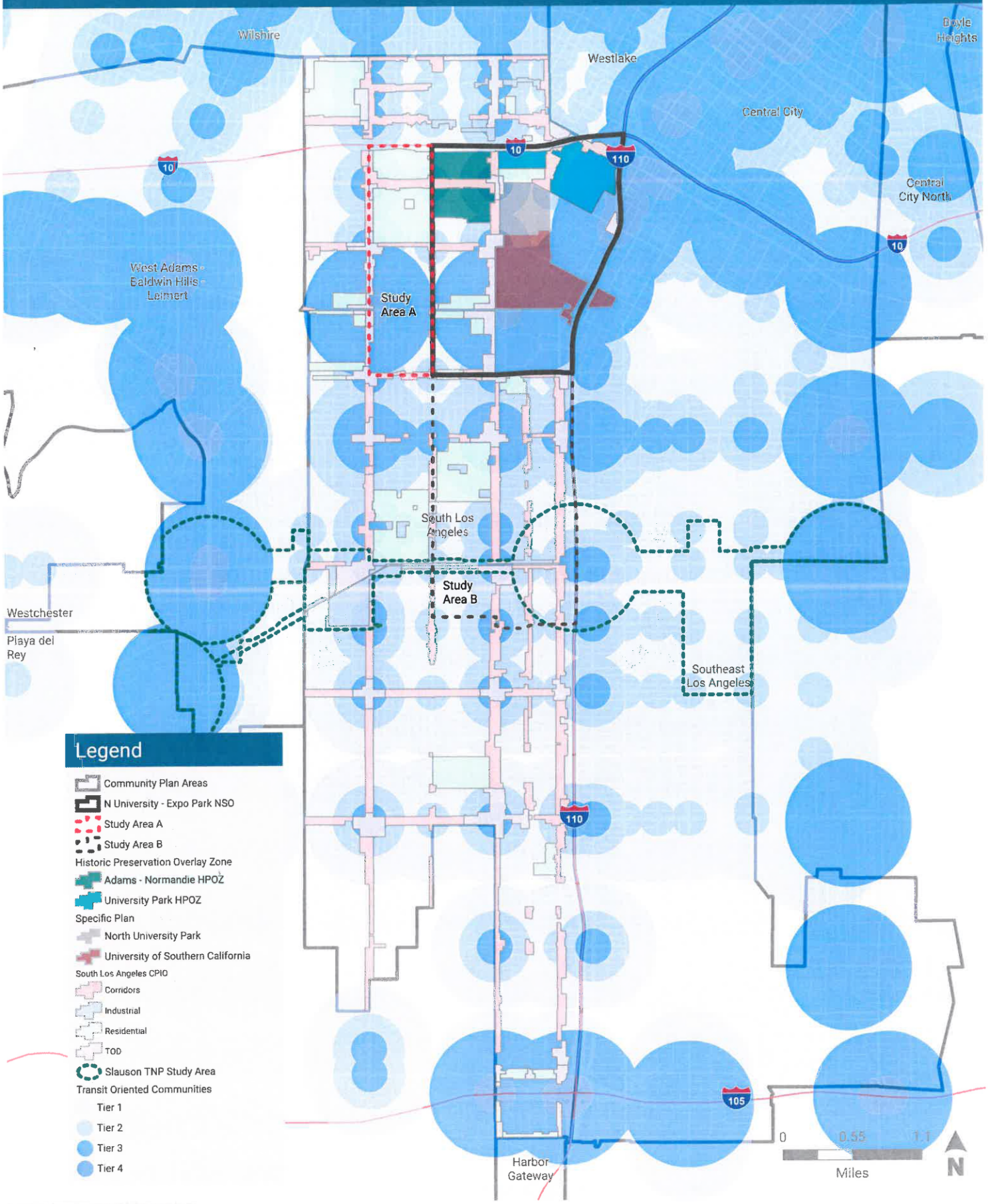


**Exhibit C: Analysis of North University-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) Supplemental Use District (SUD)**

An analysis of approved projects since the establishment of the North University-Exposition Park-West Adams NSO SUD in 2008 on Table 1 revealed that nine cases have been approved in total and two have been denied, excluding any withdrawn or terminated cases.

Of the nine cases approved:

- three were proposed additions to a single family dwelling unit;
- three were small lot subdivision cases proposing new single family dwelling units;
- two were proposed duplexes replacing a single family dwelling unit; and
- one case that also qualified for a Density Bonus proposing the construction of 99 dwelling units with varying amounts of habitable rooms.

| **Table 1 - North University-Exposition Park-West Adams NSO SUD Cases** | |
|---|---|
| Total Cases Approved: 9 | Additions to Single Family Dwelling Units: 3<br><br>Small Lot Subdivisions resulting in new Single Family Dwelling Units: 3<br><br>Duplexes replacing a Single Family Unit: 2<br><br>Density Bonus Case: 1 |

**Exhibit D: Analysis of Affordable Housing Unit Production**

Table 2 below lists the number of units approved by TOC and Small Lot Subdivision discretionary cases within the existing North University-Exposition Park-West Adams NSO SUD area since 2015.

In total, 3 TOC program discretionary cases proposing 153 units in total were approved with 15 units at the Extremely Low-Income level and 2 units at the Very Low-Income level. 3 Small Lot Subdivision Cases were approved with 1 unit at the Very Low-Income Level (via a Density Bonus).

| **Table 2 - Discretionary TOC and Small Lot Subdivision Cases in NSO SUD** | |
|---|---|
| *Total Units Approved by Case Type* | *Affordable Units Approved* |
| 3 TOC Cases: 153 units | Extremely Low Income: 15 units<br>Very Low Income: 2 units |
| 3 Small Lot Subdivision Cases: 20 units | Very Low Income: 1 unit |

For comparison, since the inception of the TOC program, 984 discretionary units have been approved in the South Los Angeles Community Plan area with 34% of these units deemed affordable. By-right TOC permit applications in the South Los Angeles Community Plan area represent an additional 612 units with 45% of those units deemed affordable. Table 3 summarizes this data below:

| **Table 3 - Discretionary and By-Right TOC Cases in South Los Angeles Community Plan** | | |
|---|---|---|
| Discretionary TOC Cases | 984 Units Approved<br>34% Affordable | Extremely Low Income: 68 units<br>Very Low Income: 19 units<br>Low Income: 248 units<br>Total Affordable Units: 335 units |
| Discretionary TOC affordable units in NSO compared to the rest of the City: 4%<br>Discretionary TOC affordable units in South LA compared to the rest of the City: 24% | | |
| By-Right TOC Cases* | 612 Units Applied<br>45% Affordable | Extremely Low Income: 48 units<br>Very Low Income: 7 units<br>Low Income: 190 units<br>Total Affordable Units: 245 units |
| By-right TOC affordable units in South Los Angeles compared to the rest of the City: 14% | | |
| * Unit counts are estimates until a building permit has been issued. Affordability levels are finalized at time of permit issuance. | | |

For perspective, while only three TOC discretionary cases have been approved, approximately ten applications have been submitted to DCP for TOC tier verification in the area bounded by the existing North University-Exposition Park-West Adams NSO SUD. Eight additional applications for TOC tier verification were submitted in the proposed expansion areas of the NSO per the boundaries described in the Council instructions for this report.

**Density Bonus**

Approximately 439 discretionary Density Bonus units have been approved in the South Los Angeles Community Plan area with 38% of these units deemed affordable. Table 4 summarizes this data below. For perspective, approximately three discretionary Density Bonus cases within the area bounded by the existing North University-Exposition Park-West Adams NSO SUD have been approved resulting in 278 units with 11% of these units deemed affordable.

| **Table 4 - Discretionary Density Bonus Cases** | | |
|---|---|---|
| Discretionary Density Bonus Cases in South Los Angeles Community Plan Area | 439 Units Approved<br>38% Affordable | Extremely Low Income: 36 units<br>Very Low Income: 63 units<br>Low Income: 39 units |
| Discretionary Density Bonus Cases within NSO SUD | 278 Units Approved<br>11% Affordable | Very Low Income: 30 units |
| Discretionary affordable units in NSO compared to the rest of the City: 0.5%<br>Discretionary affordable units in South Los Angeles compared to the rest of the City: 2.5% | | |

**South Los Angeles Community Plan Implementation Overlay**

The South Los Angeles Community Plan Implementation Overlay (CPIO) was adopted in 2018 and includes a bonus program to incentivize affordable housing projects by permitting an increase over the allowable base of a project. This bonus is available for projects found within a Transit Oriented Development (TOD) subarea and allows an applicant to choose between DB, TOC, or the CPIO incentives. Due to the higher incentives offered by TOC particularly at the higher level TOD subareas, many applicants choose to use these benefits over those offered by DB or the CPIO. Therefore, affordable housing production enabled by the CPIO is accounted for via the data provided for TOC and DB as only very few cases have been determined to have benefitted from the CPIO bonus. For instance, one project in 2021 has thus far applied for the CPIO bonus which set aside six units at the extremely low-income level.

**Exhibit E: Working Definitions for Student Housing, Co-Living Facilities and Naturally Occurring Affordable Housing**

Council requested working definitions for the following terms: student housing, co-living facilities, and naturally occurring affordable housing. Although none of these terms are defined in the LAMC, the following is presented for consideration.

*Student Housing*
Student housing is mentioned within Specific Plans established with a college or university in the City. For instance, both the University of Southern California Specific Plan and the Loyola Marymount University Specific Plan reference planned residential structures to help fulfill their on-campus housing goals. This type of housing is exclusively owned, leased, or otherwise operated by the educational institutions. A definition could be based on ownership or operation of the housing in order to distinguish it from the rest of the City's housing stock. Further discussion with the City's college or university campuses could help better understand how a definition might impact future student housing development.

A separate, but relevant issue related to defining student housing includes examining the impact of properties in close proximity to buildings near a university or college campus that advertise rental units to students. While these buildings are not owned, leased, or otherwise operated by the nearby educational institutions, such marketing could be interpreted to mean that they are meant to be exclusively for students. However, California fair housing laws preclude owners or operators from discriminating against a potential tenant based on certain protected class statuses, which include age and familial status. Furthermore, Article 5.6 of the LAMC also prohibits against the discrimination of tenants based on their status as students or non-students.

*Co-Living Facilities*
Co-living facilities are a growing housing trend, usually involving housing arrangements with a number of private spaces for sleeping combined with interior common areas including a shared kitchen, dining room, and living room. Such flexible living arrangements usually provide occupants who rent individual rooms with a wide variety of amenities and services which may come with a lower price point than renting a traditional apartment. However, these living arrangements may sometimes involve a higher concentration of occupants in a single unit compared to surrounding properties.

While this type of use is not currently defined in the Zoning Code, the City's current definition of "family" (one or more persons living together in a dwelling unit, with common access to, and common use of all living, kitchen, and eating areas within the dwelling unit), which determines who can legally occupy a single dwelling unit, allows almost any type of group and/or shared housing arrangement. The Housing Element of the General Plan (Program 67 - Amend the Zoning Code to Facilitate Non-conventional Housing) promotes the facilitation of shared housing such as congregate living, cooperative housing, and other types of group housing arrangements such as co-living facilities.

A definition for co-living facilities would need to consider a policy intent that incorporates the existing policy guidance of the General Plan and Community Plan for flexible living spaces, but also acknowledges and reconciles the immediate needs of the community facing a strong market demand for this type of housing while also facing the loss of family housing that sometimes serves larger intergenerational households.

*Naturally Occurring Affordable Housing (NOAH)*
In general, housing is considered affordable when individuals and households pay no more than 30% of their income for housing related costs. In the City, affordable housing with covenants are specifically defined with established metrics as it pertains to the entitlement process. There are several discretionary and administrative processes where projects meeting a particular set of standards qualify for additional building incentives in exchange for setting aside a specified number of restricted affordable units generally for residents whose income is within a range that does not exceed 30%-120% of the Area Median Income (AMI). The Los Angeles Housing Department (LAHD) applies a land use rent-income schedule depending on the type of project and other site-specific criteria. Each rent-income schedule identifies qualifying income levels based on family size and maximum allowable rent levels by bedroom numbers. The thresholds for AMI are derived from the California Department of Housing and Community Development by LAHD.

In comparison, naturally occurring affordable housing (NOAH) generally refers to housing that is affordable without subsidies, which in essence is local market rate housing. NOAH makes up the largest supply of affordable housing nationwide. It is typically older rental housing stock that is likely to be rehabilitated or redeveloped after being sold, making it vulnerable to exiting the low-to-moderate housing market.

Some municipalities utilize their AMI thresholds to define NOAH by identifying the type of housing and the percentage of units renting at levels deemed affordable. For instance, in Minneapolis, MN, it is generally defined as unsubsidized multifamily rental housing projects that have at least 20% of units with rents affordable to households with incomes at or below 60% AMI.

While there is no existing definition or reference to NOAH in the Zoning Code, LAHD currently operates the NOAH Loan Program, which sponsors the ability to acquire and moderately rehabilitate smaller multi-family properties and preserve them as income restricted affordable housing for the long-term. The goal of the NOAH Loan Program is to promote mixed income neighborhoods, by preserving long term affordability in communities experiencing gentrification by restricting existing units to between 50% and 120% AMI. The NOAH loan program is made possible by funds appropriated via the USC Specific Plan Development Agreement which allocated funds for the USC Nexus Study Area. The USC Nexus Study Area is bounded by Washington Boulevard to the north, Maple Avenue and Main Street to the east, Vernon Avenue to the south, and Normandie and Western Avenues to the west.

Factors that may need additional consideration upon defining NOAH, include contemplating a policy intent such as preservation, identifying data variables to define and track this type of housing, and due to the scope of the rental market in the City of Los Angeles, consideration of how it may apply to different geographic areas or types of housing. Further discussion and coordination with LAHD would need to occur to properly define this term in the LAMC.

# EXHIBIT E:

# Letter to Department of City Planning dated August 31, 2021 requesting immediate solution within 12 months

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**South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment**

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

EXHIBIT E

MARQUEECE HARRIS-DAWSON
Councilmember, Eighth District

**TO: Vince Bertoni, Director of Planning**
**FROM: Councilmember Marqueece Harris-Dawson**
**DATE: August 31, 2021**
**SUBJECT: Neighborhood Stabilization Ordinance Update**

In the spirit of a renewed commitment to equity in planning under your leadership, I request an effective team of planners to advance and expedite the solutions put forth by the Department of City Planning (DCP) staff ***within the next twelve months.***

The current Neighborhood Stabilization Ordinance (NSO) was intended to address the systemic displacement of low-income people of color in the City of Los Angeles. And the DCP team engaged the community, studied the problem at its epicenter, and provided viable and workable solutions to enhance it, and implement immediately.

I support ***both*** an amendment of the existing NSO and the Community Plan Implementation Overlay Zone, as proposed by your team. The community, however, should not have to wait 24-30 months for this crisis to be addressed. The damages and displacement levels that can take place in that period of time will be irreparable.

Thank you for your attention in this matter, I am looking forward to positive outcomes.

Marqueece Harris-Dawson

# EXHIBIT F.1:

# NANDC Task Force Demolition Permit Assessment Map

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

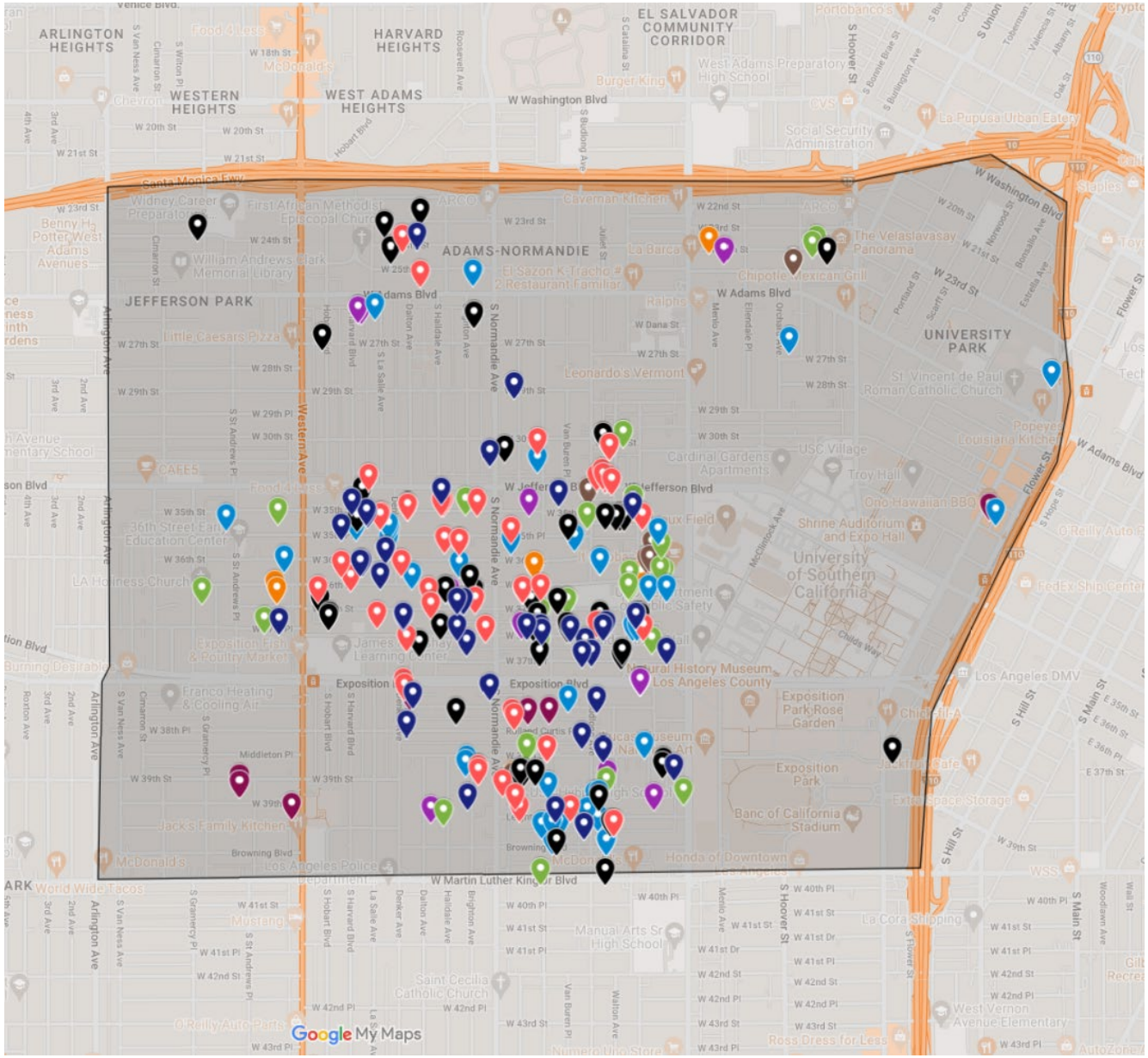
CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

# EXHIBIT F.1

## NANDC Task Force Demolition Permit Assessment Map*

| Year | SFD Demolition Permit Issued |
|---|---|
| 2013 | |
| 2014 | |
| 2015 | |
| 2016 | |
| 2017 | |
| 2018 | |
| 2019 | |
| 2020 | |
| 2021 | |




*This map was created externally by a member of the NANDC Task Force and shared with the group at various meetings to discuss the ongoing rate of single-family dwelling unit demolitions. This map was copied from its original format for the purposes of this exhibit. The data was accessed via the LADBS permit data portal at data.lacity.org.

# EXHIBIT F.2:

# Eligible Historic Resource Map

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

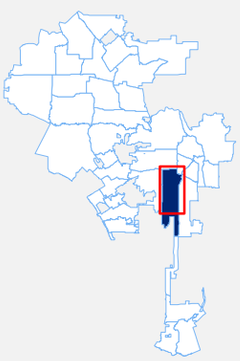
November 17, 2022

# South Los Angeles

## Historic Resources

# EXHIBIT F.2

- SurveyLA Resources - Eligible
- HPOZ
- Designated Resources
- SurveyLA - Industrial Areas
- Existing Subareas (CPIO)
- Proposed Subarea (CPIO)
- Protected Unit Area
- Community Plan Area Boundary



N

0 0.25 0.5 1 Miles

**Disclaimer:**
The City of Los Angeles is neither responsible nor liable for any inaccuracies, errors or omissions with respect to the material contained on this map. This map and all materials contained on it are distributed and transmitted "as is" without warranties of any kind, either express or implied, including without limitations, warranties of title or implied warranties of merchantability or fitness for a particular purpose. The City of Los Angeles is not responsible for any special, indirect, incidental, or consequential damages that may arise from the use of, or the inability to use, the map and/or the materials contained on the map whether the materials contained on the map are provided by the City of Los Angeles, or a third party.

# EXHIBIT F.3:

# Visual Survey

**South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment**

CPC-2022-5432-ZC-CPIOA
for consideration by the City Planning Commission

November 17, 2022

Exhibit F.3: Visual Survey*

# EXHIBIT F.3



Normandie Ave./ 51st St.



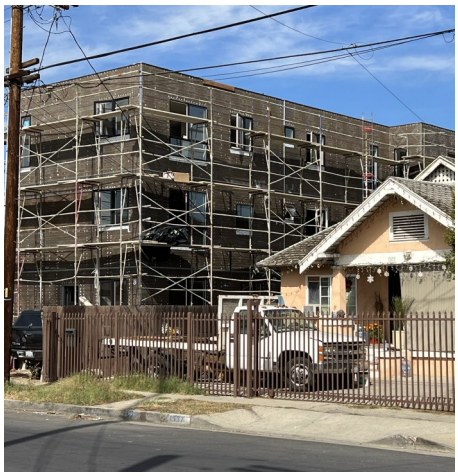
Vermont Ave./Exposition Blvd.



36th Pl./Vermont Ave.



Exposition Blvd./Normandie Ave.



Exposition Blvd./Western Ave.



Budlong. Ave./35th St.




37th St. /Vermont Ave.



36th Pl./Vermont Ave.



35th St. /Denker Ave.

*Approximate locations.

# EXHIBIT F.4:

# RSO Units Map

**South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment**

CPC-2022-5432-ZC-CPIOA
For consideration by the City Planning Commission

November 17, 2022

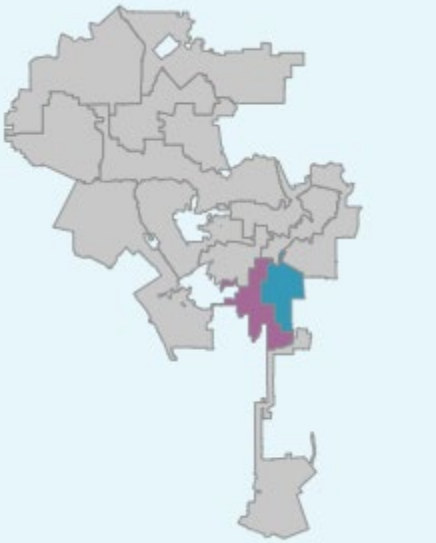
# EXHIBIT F.4

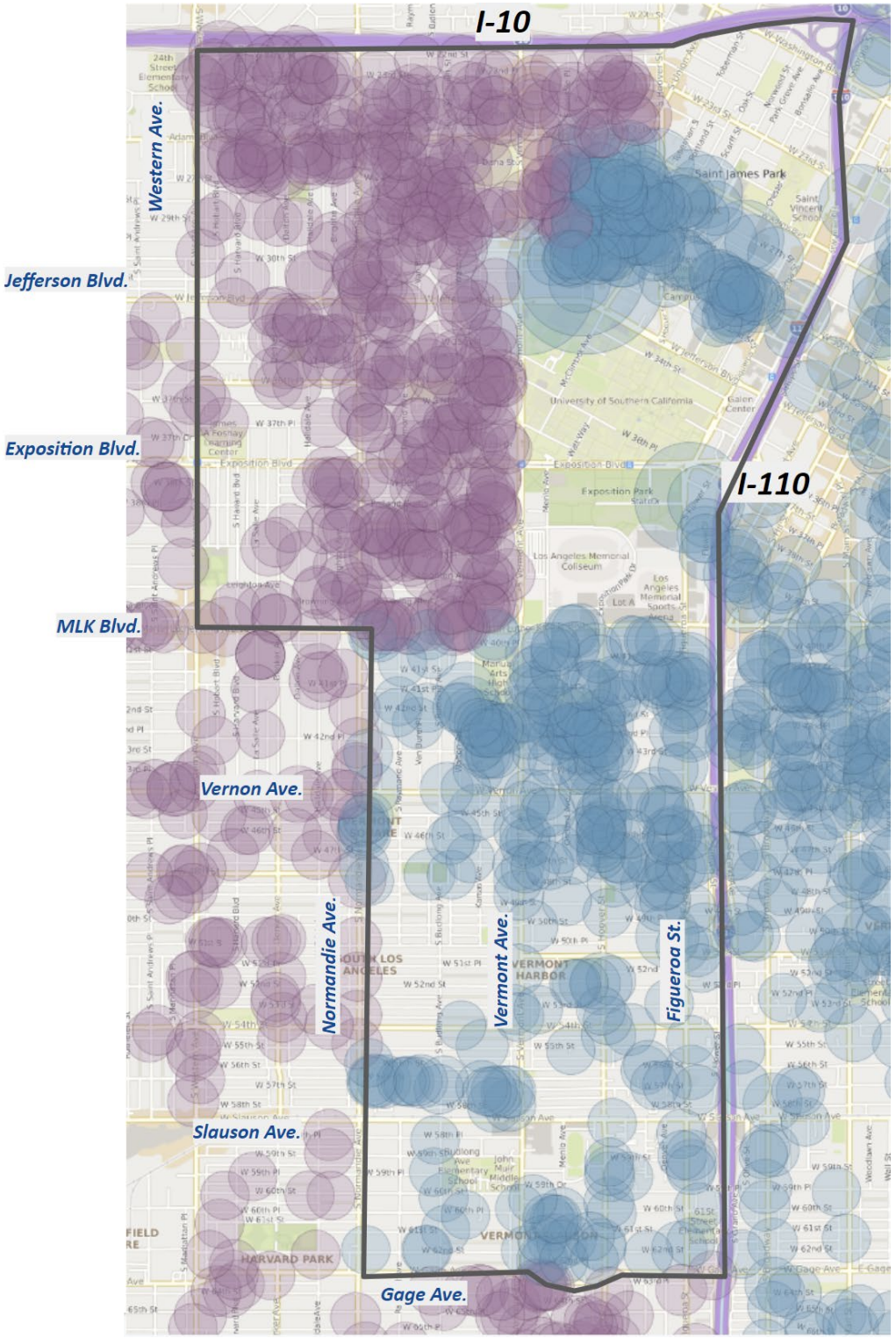
Exhibit F.4 - RSO Units Map

Council District 8

Council District 9

Protected Unit Area






Each point represents the approximate location of a property containing RSO units within the CPIO Protected Unit Area.

Total RSO Units in CD 8: 40,468
Total RSO Properties in CD 8: 11,706

Total RSO Units in CD 9: 40,865
Total RSO Properties in CD 9: 12,371

Source: https://housing.lacity.org/rso, 2022

# EXHIBIT F.5:

# Housing Crisis Act (HCA) Report

## South Los Angeles Community Plan Implementation Overlay (CPIO) Amendment

CPC-2022-5432-ZC-CPIOA

for consideration by the City Planning Commission

November 17, 2022

# EXHIBIT F.5

## Housing Crisis Act (SB 330/SB8)

## Residential Development Capacity Reductions, Offsets, and Calculations

On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019 ("HCA"). The HCA amends existing state laws and creates new regulations around the production, preservation and planning of housing. The HCA also prevents zoning actions that reduce the capacity of housing. Based on this, any zone change or CPIO amendment that results in a net downzoning or otherwise reduces housing capacity (with limited exceptions involving health and safety, affordable housing and voter initiatives) are prohibited. However, this does not apply to zone changes that reduce intensity for certain parcels if density, height and bulk (FAR) is increased on other parcels and therefore results in 'no net loss' in zoned housing capacity or intensity.

The proposed CPIO amendments that involve the creation of the CPIO Protected Unit Area and the expansion of the CPIO Residential Subarea into new neighborhoods do not reduce allowed height or density but do potentially reduce allowed residential floor area and therefore, do involve a potential reduction in "residential development capacity." This reduction takes into account CPIO Residential Subarea standards including stepbacks and setback requirements and R1 Variation Zone FAR restrictions on larger lots for a total reduction of approximately 8.4 million square feet (Table A).

**Table A: Residential Development Capacity Reductions**

| *Existing Zone* | *CPIO Residential Subarea Applied* | *Total Buildable Area Reductions (sq.ft.)* |
|---|---|---|
| R1 | O | 11,989 |
| R2 | M | 1,814,400 |
| R2 | O | 855,531 |
| R3 | O | 99,489 |
| RD3 | M | 49,600 |
| RD2 | O | 2,044,763 |
| RD1.5 | O | 2,822,110 |
| [Q]R3 | O | 684,650 |
| [Q]R4 | M or O | 3,000 |
| *Subtotal* | | 8,385,531 |
| R1 | R1R3 Zone Change | 11,989 |
| ***Total*** | | **8,397,520** |

The South Los Angeles CPIO includes the following four TOD Subareas: Low, Medium, High, and Regional. To ensure compliance with the HCA and ensure there is "no net loss" from this reduction in "residential development capacity", the project includes amendments to increase "residential development capacity" by amending the CPIO regulations to increase allowed bonus incentives for certain identified sites in TOD Subareas. Specifically, the amendments off-set the potential reduction in "residential development capacity" by applying a higher TOD Medium, TOD High or TOD Regional subarea designation to parcels currently designated TOD Low, TOD Medium, or TOD High. This increase in TOD designation will result in a higher bonus FAR and height in accommodating residential unit capacity by approximately 8.4 million square feet (Table B) and therefore the Proposed Project complies with this requirement.

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## Residential Development Capacity Reductions, Offsets, and Calculations

| Table B: Residential Development Capacity Offsets | | |
|---|---|---|
| *Existing CPIO TOD Subarea* | *CPIO TOD Subarea Applied* | *Total Buildable Area Offsets (sq. ft)* |
| TOD Low | TOD Medium | 492,888 |
| TOD Medium | TOD High | 419,700 |
| TOD Medium | TOD Regional | 4,599,304 |
| TOD High | TOD Regional | 2,904,890 |
| ***Total*** | | ***8,416,781*** |

Assumptions about "residential development capacity" reductions and off-sets relied on lot area and development standards for the underlying zone compared to those applied by the CPIO. The analysis assumes full build-out of the development envelope utilizing the lot area and development standards for each underlying zone in order to produce the largest possible estimate for total reductions. The net result of these calculations generated a net gain of approximately 19,000 square feet (Table C) as a result of applying the more intense TOD subarea designation thereby off-setting the potential reductions.

| Table C: No Net Loss Calculations | | |
|---|---|---|
| *Total Reductions* | *Total Offsets* | *No Net Loss Results* |
| **8,397,520** | **8,416,781** | **19,261** |

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