

Cornfield Arroyo Seco Specific Plan Update

Findings of Fact and Statement of Overriding Considerations

Prepared for:

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1. INTRODUCTION

The following Findings of Fact (Findings) have been prepared for the Cornfield Arroyo Seco Specific Plan Update (“CASP Update” or “Proposed Project”), for which an environmental impact report (EIR) was prepared pursuant to California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000, et seq.).

Approval of a project with significant impacts requires that findings be made by the lead agency pursuant to Public Resources Code Section 21081(a) and Section 15091 of the State CEQA Guidelines (California Code of Regulations [CCR] Title 14, Division 6, Chapter 3).

PRC Section 21081 provides:

Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:*
 - (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.*
 - (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.*
 - (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.*
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.*

State CEQA Guidelines Section 15091(a) provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:*
 - (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.*

- (2) *Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.*
- (3) *Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.*

2. FINDINGS

Unless specified otherwise, references to the EIR for the Proposed Project in this document includes the Draft EIR and the Final EIR, including the Findings document.

Based on all the information and evidence in the administrative record, the City Council for the City of Los Angeles hereby makes the following Findings of Fact:

A. General Findings

EIR Findings

The Council ratifies, adopts, and incorporates the analysis and explanations in the EIR (inclusive of the Draft EIR and Final EIR), and ratifies, adopts, and incorporates in these findings, all of the determinations and conclusions in the EIR relating to environmental impacts, mitigation measures, and alternatives.

Response to Comments

The City evaluated comments on the environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The City Council reviewed the comments received and the responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information as defined by State CEQA Guidelines Section 15088.5. The City Council finds that all information added to the EIR after public notice of the availability of the Draft EIR for public review but before certification merely clarifies, amplifies, or makes insignificant modifications to an adequate EIR and does not require recirculation. The City Council has based its actions on a full evaluation of all comments in the record of proceedings concerning the environmental impacts identified and analyzed in the EIR.

Substantial Evidence

The City Council finds and declares that substantial evidence for each Finding made herein is contained in the EIR and other materials found in the record of proceedings. Also, the City Council finds that where more than one reason exists for any Finding, the City Council finds that each reason independently supports such Finding, and that any reason in support of a given finding individually constitutes a sufficient basis for that Finding.

Relationship of Findings to the EIR

These Findings are based on the most current information available. Accordingly, to the extent there are any outward conflicts or inconsistencies between the Draft EIR and the Final EIR, on the one hand, and these Findings, on the other, these Findings shall control over the Draft EIR and the Final EIR or both, as the case may be. The EIR is hereby amended as set forth in these Findings. Corrections or information that has been added to the Draft EIR as part of the preparation of the Final EIR are described in detail in Section 2.0, Corrections and Additions, of the Final EIR.

B. Findings for Environmental Impacts Found to be Significant and Unavoidable

The Proposed Project would result in significant and unavoidable impacts after implementation of any feasible mitigation measures identified in the EIR. For each of the significant and unavoidable impacts, the City adopts one or more of the following findings as identified below:

Finding 1: Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Finding 2: Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

Finding 3: Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Air Quality

Impact 4.2-2

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

Reasonably anticipated development from the Proposed Project would result in construction emissions of NO_x to potentially exceed SCAQMD regional significance threshold, and SCAQMD local significance thresholds for NO_x, PM₁₀, and PM_{2.5}. Furthermore, reasonable anticipated development from the Proposed Project would result in operational emissions of VOC, NO_x, CO, PM₁₀, and PM_{2.5} that exceed SCAQMD regional thresholds. These exceedances would constitute a considerable net increase of PM₁₀, PM_{2.5} and ozone precursor (NO_x and VOC) emissions in the SCAB. Proposed Project features and proposed mitigation measures would reduce impacts to the maximum extent feasible, but emissions would remain above thresholds (see Draft EIR pages 4.2-25 through 4.2-33).

Adopted Mitigation Measure(s)

To help mitigate the above-described significant impacts, the City adopted the following mitigation measure in the Mitigation and Monitoring Plan (MMP):

- MM 4.2-2

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1
- Finding 3

Rationale for Finding

Mitigation

Construction Emissions

Construction projects in the Project Area with more than eight heavy duty pieces of equipment on-site and operating 8 hours per day and over 100 daily truck trips would be expected to exceed SCAQMD regional threshold for NO_x and SCAQMD LSTs for NO_x, PM₁₀, and PM_{2.5}. Mitigation Measure 4.2-2 would reduce regional and local emissions generated by various construction activities, including equipment operation, truck trips, and painting. For construction impacts, the use of Tier 4 equipment would result in a 50 to 90 percent reduction in NO_x and PM emissions from diesel-powered off-road construction equipment relative to Tier 3 engines, which are typically used as the industry standard. Requiring engines meeting Tier 4 emissions standards is becoming more common as the equipment is more widely available and would reduce emissions for some construction projects that would otherwise have significant impacts based on SCAQMD thresholds to a less than significant level. Los Angeles County Metropolitan Transportation Authority already requires the use of Tier 4 engines in all their construction projects. However, on-road heavy-duty haul trucks are not regulated under the same off-road emissions standards and the City cannot feasibly require all construction-related on-road trucks operating within City limits to adhere to more stringent engine emissions standards.

Specific 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 construction activities for a development project in the Project Area could generate emissions that would exceed the significance thresholds despite Mitigation Measure 4.2-2.

Operational Emissions

With respect to long-term operational impacts, the Proposed Project's focus on mixed use and transit-oriented development would generally minimize per capita emissions associated with vehicle trips. Adherence to the City's green building standards on all new development, as described in detail in Section 4.5, Energy of the Draft EIR, would minimize emissions associated with energy use. In addition, removing fireplaces, utilizing low VOC coating, and implementing solar panels could reduce emissions associated with operational activity. Individual projects would comply with the latest iteration of Title 24, which would implement more efficient appliances from its predecessor version.

No feasible mitigation measures are available to reduce long-term VOC, NO_x, CO, PM₁₀, and PM_{2.5} emissions associated with implementation of the Proposed Project to below SCAQMD thresholds. The

VOC content of consumer products manufactured, distributed, sold, and used within the Project Area is regulated at the State level, and there is no jurisdictional authority to enforce consumer products VOC content within the Project Area. No feasible mitigation measures are available to reduce long-term VOC emissions associated with implementation of the Proposed Project to below SCAQMD thresholds.

Alternatives

None of the alternatives studied in the EIR would reduce significant impacts related to cumulative criteria pollutant emissions to a less than significant level. Alternatives 1, 2, and 3 would result in less development in the Project Area and, thus, lower construction and operational emissions in the Project Area, as compared to the Proposed Project; however, while emissions would be less overall, they would still exceed significance thresholds for construction related NO_x emissions and operational VOC emissions. As discussed below in Section 2(E), the City rejects Alternatives 1, 2, and 3.

Conclusions

No additional feasible mitigation measures or alternatives were identified to reduce the significant impacts for construction related NO_x emissions and long-term operational VOC emissions.

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that substantially lessens the significant impact associated with construction. However, it is reasonable to assume that the CASP Update could generate emissions exceeding the significance threshold for construction related NO_x emissions despite implementation of Mitigation Measure MM 4.2-2. No feasible mitigation measures were identified for long-term operational VOC emissions.

Based on the above, specific economic, legal, social, technological, or other considerations make it infeasible to apply mitigation measures or project alternatives in a manner that would reduce the Proposed Project construction related NO_x emissions and operational VOC emission impacts to a less than significant level.

Cultural Resources

Impact 4.4-1

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update would result in a significant and unavoidable project and cumulative impact due to the possible demolition and/or significant alteration to some of the historical resources within the Project Area (see Draft EIR pages 4.4-32 to 4.4-34 and Final EIR pages 2-2 to 2-6).

Adopted Mitigation Measure(s)

To help mitigate the above-described significant impacts, the City adopted the following mitigation measures in the Mitigation and Monitoring Plan (MMP):

- MM 4.4-1(a)

- MM 4.4-1(b)
- MM 4.4-2(a)
- MM 4.4-2(b)
- MM 4.4-2(c)

Findings(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1
- Finding 3

Rationale for Finding

Mitigation

While the CASP Update includes a review process for development projects that include the demolition or alteration of a designated or eligible historical resource, it is possible that demolition and/or significant alteration to some of the historical resources within the Project Area could occur.

All discretionary projects that have the potential to impact historical resources must be individually reviewed by the Office of Historic Resources. While the Office of Historic Resources reports that it is extremely uncommon in the City to lose designated historical resources when a property owner has complied with the City's regulations, the Cultural Heritage Ordinance and the Building Code, it cannot prevent a property from being demolished or redeveloped or prevent structures from being altered. Rather these ordinances provide for processes, including environmental review, but they do not prohibit demolition. It is possible that demolition and/or significant alteration to some of the historical resources within the Project Area would occur during the life of the Proposed Project. For example, the Housing Authority of the City of Los Angeles (HACLA) is exploring the potential future redevelopment of housing on the William Mead Homes site, which is composed of one built environment historical resource, the William Mead Homes property. The resource was determined eligible for the NRHP, with SHPO concurrence, and is listed in the CRHR; the property therefore qualifies as a historical resource as defined by Section 15064.5(a) of the CEQA Guidelines. Redevelopment of the William Mead Homes site, which could occur due to the Proposed Project, would result in the demolition of buildings and structures that contribute to the resource's eligibility for listing in the NRHP and CRHR. A project that may cause a substantial adverse change in the significance of a historic resource is one where the change would result in the significance of the resource being materially impaired. As such, the future redevelopment of the site would cause the material impairment of William Mead Homes, meaning it would alter in an adverse manner, those physical characteristics that convey its historical significance and that justify its inclusion in the NRHP and CRHR. Although the existing regulations provide certain protections for significant historical resources, individual reasonably anticipated development from the Proposed Project could potentially cause a substantial adverse change in or disturbance of historical resources as defined in CEQA Guidelines Section 15064.5.

Mitigation Measures 4.4-1(a) and 4.4-2(b) require that if the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement measures relative to

an Interpretive Display and Informational Website. Mitigation Measures 4.4-1(a) and 4.4-1(b) would serve to reduce historical resources impacts to the greatest extent feasible relative to the potential future redevelopment of the William Mead Homes site. However, as discussed, historical resources that are designated under HCM may be demolished if an applicant goes through the discretionary review process and prepares necessary environmental review. Resources included in 2011 Project Area Survey are not prohibited from demolition or alteration, provided they go through the appropriate process including environmental review. As a policy matter, the City finds that requiring additional review of projects otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects. Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes on ministerial projects involving historical resources that are designated under the HCM or identified in the 2011 Project Area Survey. Even after Mitigation Measures 4.4-1(a) and 4.4-2(b), impacts to historical resources including the William Mead Homes site from the Proposed Project will remain significant and unavoidable.

Alternatives

None of the alternatives studied in the EIR would reduce significant impacts related to historical resources to a less than significant impact. Alternatives 1, 2, and 3 would result in less development and therefore fewer historical resources are likely to be disturbed, but significant and unavoidable impacts could still occur. As discussed below in Section E, the City rejects Alternatives 1, 2, and 3. Further, as discussed below in Section E, three additional alternatives, Alternatives 4, 5, and 6, were considered that focus on reducing significant impacts to Cultural Resources should there be future redevelopment of housing at the William Mead Homes site, but the alternatives were rejected as they were considered infeasible.

Conclusions

No feasible alternative or mitigation measures were identified to reduce impacts related to historical resources from the CASP Update to less than significant.

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that substantially lessens the significant impact to historical resources. However, even after Mitigation Measures 4.4-1(a) and 4.4-2(b), impacts to historical resources including the William Mead Homes site from the Proposed Project will remain significant and unavoidable.

Based on the above, specific economic, legal, social, technological, or other considerations make it infeasible to apply mitigation measures or project alternatives in a manner that would reduce the CASP Update and cumulative impacts to historical resources to a less than significant level.

Noise and Vibration

Impact 4.11-1 – Operational Traffic Noise

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The transportation analysis, on which the noise analysis is based, evaluates reasonably anticipated development that is expected to occur by 2040 as a result of the Proposed Project (see Section 4.15, Transportation and Traffic, of the Draft EIR). The reasonably anticipated development is based on the acreage of land designated for each type of land use, allowable densities and intensities for each land use designation, reasonably expected levels of development through the life of the Proposed Project. Actual noise levels that could result from the Proposed Project may not be as high as noise levels calculated in this analysis. Therefore, mobile noise impacts would be potentially significant (Draft EIR pages 4.11-21 to 4.11-22).

Adopted Mitigation Measure(s)

No feasible mitigation measures exist to reduce noise levels to less than significant.

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1
- Finding 3

Rationale for Finding

Mitigation

No feasible mitigation measures exist to reduce operational traffic noise level increases to less than significant. Conservatively assuming that the entire increase in noise in the future would be attributable to the Proposed Project, the ambient noise level as a result of traffic increases under the Proposed Project (Future with Project compared to Existing) would increase. As shown in the EIR, daily vehicle trips would increase by approximately 276 percent over existing 2021 conditions by the year 2040 under the Proposed Project. A 276 percent increase in traffic on a roadway would equate to an increase of 5.8 dBA. It is possible that noise level increases of this size could result in noise levels that are within the “normally unacceptable” category for land uses adjacent to these corridors, including residential, school, and commercial uses.

Alternatives

None of the alternatives studied in the EIR would reduce significant impacts related to operational traffic noise to a less than significant level. Alternatives 1, 2, and 3 would result in less development and

therefore fewer number of persons could experience health effects from significant construction noise impacts, but significant and unavoidable impacts could still occur. As discussed below in Section E., the City rejects Alternatives 1, 2, and 3.

Conclusions

With regard to operational traffic noise, the noise increase in the Project Area is created by the Proposed Project increasing density in an underutilized area through infill development. The VMT per service population would decrease under the Proposed Project, indicating that VMT traveled per person will become more efficient and, thus, traffic noise generated per person would lessen. However, the substantial increase in population and related vehicle trips within the Project Area that the Proposed Project is designed to accommodate would lead to a potentially significant noise increase in traffic noise. Measures to reduce traffic noise typically occur through the implementation of large sound walls, which is not feasible in a developed area due to property logistics, access gaps that eliminate noise attenuation of the walls, and excessive costs. Therefore, no feasible mitigation measures exist to reduce noise levels to less than significant.

Based on the above, specific economic, legal, social, technological, or other considerations make it infeasible to apply mitigation measures or project alternatives in a manner that would reduce the CASP Update impacts related to temporary construction noise to a less than significant level.

Impact 4.11-1 – Temporary Construction Noise

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

All construction would be required to comply with the appropriate Regulatory Compliance Measures as well as Los Angeles Municipal Code (LAMC) Chapter 41.40, Section 112.05. Nevertheless, reasonably anticipated development from the Proposed Project would potentially result in construction with lengthy durations, substantial soil movement, use of large, heavy-duty equipment, and/or pile driving near noise-sensitive land uses that would result in significant impacts that cannot be feasibly mitigated. Therefore, the impact generated by temporary construction noise would also be significant and unavoidable (Draft EIR pages 4.11-18 to 4.11-25).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.11-1

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

- Finding 3

*Rationale for Finding**Mitigation*

Implementation of Mitigation Measure 4.11-1 would reduce temporary construction noise for projects within the Project Area to the extent feasible. For any project whose earthwork or construction activities involve the use of construction equipment and require a permit from the Department of Building and Safety (LADBS); are located within 500 feet of Noise-Sensitive Uses; and have two or more subterranean levels, 20,000 cubic yards or more of excavated material, simultaneous use of five or more pieces of construction equipment, construction duration (excluding architectural coatings) of 18 months or more, or construction activities involving impact pile driving or the use of 300 horsepower equipment, Mitigation Measure 4.11-1 would require preparation of a Noise Study by a qualified noise expert prior to obtaining any permit from LADBS.

A noise study shall be required for all discretionary projects in the Project Area located within 500 feet of noise-sensitive land uses and that have one or more of the following characteristics:

- Two or more subterranean levels or 20,000 cubic yards or more of excavated material;
- Construction duration (excluding architectural coatings) of 18 months or more;
- Use of large, heavy-duty equipment rated 300 horsepower or greater; or
- The potential for impact pile driving.

Noise-sensitive land uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses, and identify measures to reduce noise exposure. The Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques shall include but not be limited to: mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.

Project applicants shall be required to comply with all measures identified and recommended by the Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.

Alternatives

None of the alternatives studied in the EIR would reduce significant impacts related to temporary construction noise to a less than significant level. Alternatives 1, 2, and 3 would result in less development and therefore fewer number of persons could experience health effects from significant construction noise impacts, but significant and unavoidable impacts could still occur. As discussed below in Section E., the City rejects Alternatives 1, 2, and 3.

Conclusions

As described above, the construction activity associated with reasonably anticipated development from the Proposed Project could result in potentially significant temporary noise impacts. Mitigation Measure 4.11-1 requires completion of a Noise Study for all discretionary projects in the Project Area located within 500 feet of a noise-sensitive land use that includes one of four characteristics associated with substantial construction activity levels. Mitigation Measure 4.11-1 requires the implementation of mufflers, shields, sound barriers and/or any other available noise reduction device or techniques. However, because the nature, size, and location of future projects is unknown and mitigation measure 4.11-1 only applies to discretionary projects, construction noise at various sensitive land uses could result in significant impacts.

In consideration of the related health effects of reasonably anticipated development from the Proposed Project, to determine the number of incidences of exceedance of noise thresholds we can be guided by historical development. It is reasonable to anticipate that one or two projects per year would require a level of construction duration or equipment activity that could result in significant construction noise impacts to nearby sensitive receptors. As detailed under *Health Effects of Environmental Noise*, human health effects range from annoyance to hearing loss and physiological effects, but response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity exposed to the noise source. It is not feasible to determine a specific number of persons that could experience health effects from significant construction noise impacts since such effects would depend on the intensity and duration of noise, the distance between noise sources and receivers, and whether noise barriers are present between sources and receivers, but it is likely that individuals in the Project Area will experience varying levels of disturbance related to construction noise with or without implementation of the Proposed Project.

Based on the above, specific economic, legal, social, technological, or other considerations make it infeasible to apply mitigation measures or project alternatives in a manner that would reduce the CASP Update impacts related to temporary construction noise to a less than significant level.

Impact 4.11-2 - Temporary Increase in Ground-borne Vibration (Construction)

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update would result in a significant and unavoidable project and cumulative impacts related to temporary ground-borne vibration or ground-borne noise (collectively “ground-borne vibration”) during construction of reasonably anticipated development under the CASP Update (see Draft EIR pages 4.11-26 to 4.11-29).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.11-2(a)
- MM 4.11-2(b)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1
- Finding 3

Rationale for Finding

Implementation of Mitigation Measures 4.11-2(a) and 4.11-2(b) would document the physical condition of potentially affected structures, substantially reduce/control construction vibration, and provide a process for repair of vibration damage in the event it occurs. However, in the absence of construction details associated with specific projects and without knowing the proximity of construction activities to specific receptors, it is anticipated that construction vibration levels at certain particularly fragile adjacent buildings could exceed the thresholds of significance. Therefore, because it is unknown if there would be projects of the size necessary to cause a significant vibration impact adjacent to fragile buildings this impact is considered significant despite implementation of the above mitigation measures. No other feasible mitigation measures were identified.

Alternatives

None of the alternatives would reduce significant impacts related to temporary groundborne vibration during construction to a less than significant level. Alternatives 1, 2, and 3 would result in less development and would result in less potential for construction activities to cause a significant vibration impact to adjacent buildings. As discussed below in Section .E, the City rejects Alternatives 1, 2, and 3.

Conclusions

No additional feasible mitigation measures or alternatives were identified to reduce the significant impacts for temporary ground-borne vibration impacts.

Development projects in the City of Los Angeles typically do not result in vibration damage even though vibration generating equipment is utilized for all urban infill construction. Although most construction activities located in the Project Area are not anticipated to have significant vibration impacts, it is possible that a small number of development projects in the Project Area could have significant vibration impacts during construction. This would most commonly occur when a development project would be located next to a historical resource constructed of fragile building materials, which is more sensitive to vibration damage, than structures that were built based on more recent building codes. Mitigation Measure 4.11-2(a) would reduce vibration impacts whenever a development project is located near a historical resource constructed of fragile materials. Although, it is difficult to quantify the vibration reduction associated with Mitigation Measure 4.11-2(a) without knowing the specifics of a development project, including the distance from the equipment to the historical resource. Implementing caisson drilling instead of impact pile driving would reduce vibration levels from 112 Vdb at 25 feet to approximately 87 Vdb at 25 feet. The unmitigated analysis also concludes that 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. Vibration is an unavoidable byproduct of construction activity. In an urban environment, vibration from construction equipment is related to the weight and movements of equipment. In the absence of specific

development projects with detailed construction requirements and known adjacent uses, there is no way to determine specific potential for impact and feasible, appropriate mitigation to control equipment weight and movements from construction activity associated with each infill project.

Requiring Mitigation Measures 4.11-2(a) and/or 4.11-2(b) for all development projects would be infeasible because the City has determined that the use of staff resources to apply these mitigation measures to all ministerial projects is not justified. It would require City staff to evaluate each and every ministerial project to determine if that project, because of its unique characteristics, should be subject to this mitigation measure. Additionally, it would require rezoning every property to get authority to review ministerial projects. 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 significant impacts.

It is anticipated that Mitigation Measure 4.11-2(a) would substantially reduce/control construction vibration for historical resources or those of fragile construction. In addition, Mitigation Measure 4.11-2(b) would limit vibration levels at uses other than historic properties. However, in the absence of construction details associated with specific projects and without knowing the proximity of construction activities to specific receptors, it is anticipated that construction vibration levels at certain particularly fragile adjacent buildings could exceed the thresholds of significance.

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that substantially lessens the significant impact associated with temporary ground-borne vibration impacts. Based on the above, specific economic, legal, social, technological, or other considerations make it infeasible to apply mitigation measures or project alternatives in a manner that would reduce the CASP Update impacts related to temporary ground-borne vibration to a less than significant level.

Transportation and Traffic

Impact 4.15-3

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update would result in significant and unavoidable project and cumulative impacts related to off ramp queuing on State highway facilities (see Draft EIR pages 4.15-40 to 4.15-41, 4.15-47 to 4.15-48).

Adopted Mitigation Measure(s)

No feasible mitigation measures have been identified that could reduce the significant impacts related to off ramp queuing on State highway facilities.

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 3

Rationale for Finding

Mitigation

Significant and unavoidable impacts have been identified in relation to the potential for project-specific ramp queuing safety impacts as growth occurs pursuant to the CASP Update. Potential mitigation may include transportation demand management strategies to reduce a project's trip generation, investments to active transportation infrastructure, or transit system amenities, and/or operational changes to the ramp terminal such as lane reassignment, traffic signalization, signal phasing or timing modifications, etc. However, without specific information on where safety impacts may occur as a result of freeway off ramp queuing, it is not possible to identify appropriate mitigation measures.

Currently, there is no identified State plan or project to implement any improvements to these State facilities, nor is there a financing plan in place to fund the improvements for impacts resulting from jurisdictions outside the City or existing deficiencies. As individual projects are identified, the City will work with Caltrans to identify project specific mitigation measures as appropriate. In such a context, under the Mitigation Fee Act, it is not feasible for the City to adopt local fees for its share of impacts to State facilities. Therefore, no feasible mitigation can be identified for the Project Area. It is anticipated that subsequent land use development projects that are seeking approval under the CASP Update will be required to study freeway queuing and safety impacts in more detail per the Interim Guidance for Freeway Safety Analysis.

Alternatives

None of the alternatives studied in the EIR would reduce significant impacts related to ramp queuing safety to a less than significant level. Alternatives 1, 2, and 3 would result in less development and would result in reduced vehicle queuing at freeway ramps compared to the CASP Updates. As discussed below in Section E., the City rejects Alternatives 1, 2, and 3.

Conclusions

No feasible alternative or mitigation measures were identified to reduce impacts related to highway safety as a result of design features or incompatible uses from the CASP Update to less than significant.

Based on the above, specific economic, legal, social, technological, or other considerations make it infeasible to apply mitigation measures or project alternatives in a manner that would reduce the CASP Update and cumulative impacts to highway safety to a less than significant level.

C. Findings for Environmental Impacts Found to be Less than Significant After Mitigation

The EIR identifies significant impacts that are reduced to a "less than significant" level by the imposition of mitigation measures identified in the EIR.

For each significant impact discussed below, the City adopts the following findings:

Finding 1: Changes or alterations have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Air Quality

Impact 4.2-3

Construction under the Proposed Project may expose sensitive receptors to substantial pollutant concentrations. Implementation of Mitigation Measure 4.2-2 and adherence to existing regulations would minimize exposure to substantial pollutant concentrations. Operational emissions would not expose sensitive receptors to substantial pollutant concentrations.

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measure in the MMP:

- MM 4.2-2

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation Measure 4.2-2 would reduce TAC emissions generated by construction activities, including equipment operation. For example, Tier 4 engines with horsepower ratings between 175 and 750 generate 90 percent less exhaust emissions, including diesel particulate matter, than Tier 2 or 3 engines. Imposition of Mitigation Measure 4.2-2 would reduce impacts to less than significant with mitigation.

Biological Resources

Impact 4.3-1

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The Project Area is urbanized and lacks suitable habitat that would support special-status plant or animal species; therefore, the potential to adversely affect endangered and special-status plant and animal species would be low. However, a variety of bird species protected by the MBTA are adapted to human activity and may utilize existing trees and shrubs for nesting or foraging. Temporary direct and indirect impacts from the Proposed Project include the removal or degradation (e.g., excessive noise, dust, or light) of this habitat. Mitigation measures and regulatory requirements would ensure that temporary impacts to special-status species, such as the burrowing owl, which have been known to nest in manmade objects, and migratory birds would be less than significant with mitigation (see Draft EIR pages 4.3-24 to 4.3-28).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.3-1
- MM 4.3-2(a)
- MM 4.3-2(b)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

Implementation of Mitigation Measures MM 4.3-1 through MM 4.3-2(b) would reduce potential impacts to special-status species such as the burrowing owl and active bird nests to a less-than-significant level by ensuring that active nests are identified and avoided, as necessary.

Alternatives

Alternatives 1, 2, and 3 would have less development overall than the Proposed Project but would still have potentially significant impacts before mitigation. Mitigation Measures MM 4.3-1 to MM 4.3-2(b) would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with a substantial adverse change in or disturbance of known or unknown biological resources from the CASP Update to a less than significant level.

Impact 4.3-3

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

Implementation of the Proposed Project would not result in an adverse effect to the Los Angeles River or Arroyo Seco and no other wetlands are located in or adjacent to the Project Area. However, indirect impacts could result from excessive dust generated by developments occurring in the vicinity of the Los

Angeles River and Arroyo Seco. Impacts to wetlands would be less than significant with mitigation incorporated (see Draft EIR page 4.3-29).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the Mitigation and Monitoring Plan (MMP):

- MM 4.1-1

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

Implementation of Mitigation Measures MM 4.1-1 would reduce potential impacts from fugitive dust. Implementation of the above mitigation measure would reduce potential impacts to wetlands to a less-than-significant level by ensuring that fugitive dust is avoided.

Alternatives

Alternatives 1, 2, and 3 would have less development overall than the Proposed Project but would still have potentially significant impacts before mitigation. Mitigation Measure MM 4.1-1 would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with a substantial adverse change in or disturbance of known or unknown biological resources from the CASP Update to a less than significant level.

Cultural Resources

Impact 4.4-2

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update would result in significant impacts related to substantial adverse changes in or disturbance of known or unknown archeological resources that is reduced to less than significant level

by the inclusion of Mitigation Measures MM 4.4-2(a) through MM 4.4-2(c) (see Draft EIR pages 4.4-34 to 4.4-38).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.4-2(a)
- MM 4.4-2(b)
- MM 4.4-2(c)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

Implementation of Mitigation Measures 4.4-2(a), 4.4-2(b), and 4.4-2(c) would avoid significant direct impacts to archaeological resources to the maximum extent feasible and provide for recovery and/or documentation of any significant resources, including any present portions of the Zanja Madre, which cannot be preserved in place. With mitigation, significant archaeological resources would be preserved and impacts to archaeological resources would be less than significant with mitigation.

Alternatives

Alternative 1, 2, and 3 would have less development overall than the Proposed Project but would still have potentially significant impacts before mitigation. Mitigation Measures 4.4-2(a), 4.4-2(b), and 4.4-2(c) would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with a substantial adverse change in or disturbance of known or unknown archaeological resources from the CASP Update to a less than significant level.

Geology and Soils

Impact 4.6-6

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

Implementation of the Project could significantly impact unique paleontological or a unique geologic feature. Mitigation Measures 4.6-6(a) and 4.6-6(b) would minimize potential impacts during excavation activities. Impacts to paleontological resources would be less than significant with mitigation (see Draft EIR pages 4.6-25 to 4.6-27).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.6-6(a)
- MM 4.6-6(b)
- MM 4.6-6(c)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

Implementation of Mitigation Measures 4.6-1(a), 4.6-1(b) and 4.6-1(c) would reduce impacts to paleontological resources to a *less than significant level* by ensuring that potential resources are identified and either further avoided or recovered. Therefore, impacts to paleontological resource would be less than significant with mitigation.

Alternatives

Alternative 1, 2, and 3 would have less development overall than the Proposed Project but would still have potentially significant impacts before mitigation. Mitigation Measures 4.6-6(a), 4.6-6(b), and 4.6-6(c) would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with a substantial adverse change in or disturbance of known or unknown paleontological resources from the CASP Update to a less than significant level.

Hazards and Hazardous Materials

Impact 4.8-3

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update would primarily introduce new residential, commercial, and light industrial development that would not involve the use of large quantities of hazardous materials. Although new development could occur within 0.25 mile of existing schools, such development would not be expected to create hazards associated with hazardous materials use. Grading and construction activity could potentially result in the release of soil and/or groundwater contamination, which could potentially affect schools. However, implementation of Mitigation Measures 4.8-4(a) and (b) along with compliance with applicable regulations would ensure this impact would be less than significant with mitigation (see Draft EIR pages 4.8-42 to 4.8-43).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.8-4(a)
- MM 4.8-4(b)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

Implementation of Mitigation Measure 4.8-4 would reduce impacts to schools to a less than significant level by ensuring the identification, and as necessary, remediation of soil and/or groundwater contamination prior to excavation or grading on properties within 0.25 mile of schools. Impacts related to hazardous emissions would be less than significant with mitigation incorporated.

Alternatives

Mitigation Measure Mitigation Measure 4.8-4 would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials within the CASP Update to a less than significant level.

Impact 4.8-4

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update would entail development that may occur on properties listed as hazardous material sites. The possible presence of soil or groundwater contamination on such sites could expose construction workers and residents or visitors on neighboring properties to hazards during construction of individual future developments. However, implementation of Mitigation Measures 4.8-4(a) and (b) along with compliance with applicable regulations would ensure project impacts would be less than significant with mitigation incorporated (see Draft EIR pages 4.8-43 to 4.8-46).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.8-4(a)
- MM 4.8-4(b)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

Contamination of soils and groundwater with hazardous materials is heavily regulated by multiple statutes and agencies. Compliance with applicable laws and mitigation measures will ensure minimal impact. Mitigation measures are provided to ensure that applicants are put on notice of the need to determine if there is contamination on Site and avoid impacts that may result from lack of detection. The above measures provide for processes to ensure that any development under the Proposed Project would not create a significant hazard to the public or environment during construction or operation. Thus, this impact would be less than significant with mitigation incorporated.

Alternatives

Mitigation Measures MM 4.8-4(a) and MM 4.8-4(b) would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with the development of site which are included on a list of hazardous materials sites pursuant to Government Code Section 65962.5 within the CASP Update to a less than significant level.

Tribal Cultural Resources

Impact 4.16-1

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

The CASP Update could result in significant impacts to tribal cultural resources. Grading and excavation of individual development projects that disturb previously undisturbed soils could potentially encounter intact tribal cultural resources within the Project Area. The impacts would be reduced to a less than significant level by the inclusion of Mitigation Measures MM 4.4-2(a) through MM 4.4-2(c), and MM 4.16-1(a) through MM 4.16-1(c) (see Draft EIR pages 4.16-5 to 4.16-9).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.4-2(a)
- MM 4.4-2(b)
- MM 4.4-2(c)
- MM 4.16-1(a)
- MM 4.16-1(b)
- MM 4.16-1(c)

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

*Rationale for Finding**Mitigation*

Implementation of the above measures, in combination with Measures 4.4-2(a) through (c) in Section 4.4, Cultural Resources, would reduce impacts to tribal cultural resources to a less than significant level by requiring a process to identify and, if necessary, avoid and/or recover identified tribal cultural resources throughout the Project Area, including areas where resources have been previously identified. The impact would be less than significant with mitigation incorporated.

Alternatives

Alternatives 1, 2, and 3 would result in less development and would result in less potential to encounter tribal cultural resources. Mitigation Measures MM 4.4-2(a) to MM 4.4-2(c) and MM 4.16-1(a) to MM 4.16-1(c) would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects associated with the development of site.

*Utilities***Impact 4.17-5**

The following findings are for the Proposed Project impacts and cumulative impacts.

Description of Significant Effect(s)

Implementation of the Proposed Project is forecast to increase water demand in the Project Area by approximately 4,108,024 gpd (17,892 afy), an increase of 100 percent from existing conditions. Although the City's 2020 UWMP indicates adequate water supply exists to meet projected demand through the year 2045, a water supply assessment will ensure that there is adequate supply to address the increase in population and water supply demand projected. Therefore, impacts to water supply would be less than significant with mitigation (see Draft EIR pages 4.17-39 to 4.17-42).

Adopted Mitigation Measure(s)

To mitigate the above-described significant impacts, the City adopted the following mitigation measures in the MMP:

- MM 4.17-1

Finding(s)

The City adopts the following findings for the above-described significant impacts:

- Finding 1

Rationale for Finding

Mitigation

To ensure there is adequate water supply, Mitigation Measure 4.17-1 requires completion of a Water Supply Assessment for all discretionary projects in the Project Area if required by SB 221. With this, impacts would be less than significant with mitigation.

Alternatives

Alternatives 1, 2, and 3 would result in less development and would result in less potential for water use. Mitigation Measure 4.17-1 would be assumed to apply to Alternatives 1, 2, and 3, which would reduce impacts to less than significant for all three alternatives.

Conclusions

The City finds that changes or alterations have been required in, or incorporated into, the Proposed Project that would reduce significant environmental effects to water supply within the CASP Update to a less than significant level.

D. Findings for Environmental Impacts Found to be Less than Significant or No Impact

Based on the EIR, the City finds the Proposed Project, inclusive of the future development within the scope of the EIR, to have less than significant impacts, or no impacts, without mitigation to all other significant impacts not identified in Section 2(B) and 2(C), including the following:

Aesthetics

- Scenic Vistas (Draft EIR pages 4.1-32 to 4.1-33): Less than significant impact.
- Scenic Resources within State Scenic Highway (Draft EIR page 4.1-33): No impact.
- Scenic Quality Zoning and Regulations (Draft EIR pages 4.1-34 to 4.1-37): Less than significant impact.
- Light and Glare (Draft EIR pages 4.1-37 to 4.1-38): Less than significant impact.
- Cumulative Impacts (Draft EIR pages 4.1-38 to 4.1-40): Less than significant impact.

Air Quality

- Conflict with Air Quality Plan (Draft EIR pages 4.2-23 to 4.2-24): Less than significant impact.

- Odors (Draft EIR pages 4.2-36 to 4.2-37): Less than significant impact.
- Cumulative Impacts (Draft EIR pages 4.2-37 to 4.2-38): Less than significant impact (Air Quality Plan and Odor).

Biological Resources

- Riparian Habitat (Draft EIR page 4.3-28): Less than significant impact.
- Migratory Wildlife (Draft EIR pages 4.3-30): Less than significant impact.
- Local Policies and Ordinances (Draft EIR pages 4.3-30 to 4.1-31): Less than significant impact.
- Habitat Conservation Plan (Draft EIR page 4.3-32): No impact.
- Cumulative Impacts (Draft EIR pages 4.3-33 to 4.1-34): Less than significant impact.

Cultural Resources

- Human Remains (Draft EIR pages 4.4-38 to 4.4-39): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.4-39 to 4.4-40): (Human Remains): Less than significant.

Energy

- Inefficient Energy Consumption (Draft EIR pages 4.5-21 to 4.5-25): Less than significant impact.
- Renewable Energy/Energy Efficiency Plan (Draft EIR page 4.5-25): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.5-25 to 4.5-26): Less than significant impact.

Geology and Soils

- Earthquake Fault (Draft EIR pages 4.6-19 to 4.6-21): No impact.
- Seismic Ground Shaking (Draft EIR pages 4.6-19 to 4.6-21): No impact.
- Seismicity (Draft EIR pages 4.6-19 to 4.6-21): No impact.
- Soil Erosion (Draft EIR pages 4.6-22 to 4.6-23): Less than significant impact.

- Unstable Soils (Draft EIR pages 4.6-23 to 4.6-24): Less than significant impact.
- Expansive Soil (Draft EIR pages 4.6-24): Less than significant impact.
- Septic Tanks (Draft EIR pages 4.6-24): No impact.
- Cumulative Impact (Draft EIR Pages 4.6-29 to 4.6-30): Less than significant impact (Geology and Soils).

Greenhouse Gas Emissions

- Plans, Policies, and Regulations (Draft EIR pages 4.7-38 to 4.7-54): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.7-54 to 4.7-55): Less than significant impact.

Hazards and Hazardous Materials

- Hazardous Materials Transport, Use, Disposal (Draft EIR pages 4.8-38 to 4.8-39): Less than significant impact (Operations).
- Airport Land Use Plans (Draft EIR page 4.8-46): No impact.
- Emergency Response Plans (Draft EIR pages 4.8-47 to 4.8-48): Less than significant impact.
- Wildfires (Draft EIR page 4.8-48): No impact.
- Cumulative Impact (Draft EIR pages 4.8-48 to 4.8-50): No Impact (Public Airport). Less than significant impact (Emergency Response Plans, and Wildland Fires).

Hydrology and Water Quality

- Groundwater Quality/Discharge Requirements (Draft EIR pages 4.9-26 to 4.9-29): Less than significant impact.
- Groundwater (Draft EIR pages 4.9-29 to 4.9-30): Less than significant impact.
- Drainage – Erosion, Runoff, Flooding (Draft EIR pages 4.9-31 to 4.9-32): Less than significant impact.
- Pollutants (Draft EIR page 4.9-33): Less than significant impact.

- Water Quality Plans and Policy Consistency (Draft EIR pages 4.9-34): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.9-34 to 4.9-35): Less than significant impact.

Land Use and Planning

- Physically Divide a Community (Draft EIR pages 4.10-20 to 4.10-21): No impact.
- Land Use Plan and Policy Consistency (Draft EIR pages 4.10-21 to 4.10-35): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.10-35): Less than significant impact.

Noise and Vibration

- Operational Stationary Noise (Draft EIR pages 4.11-18 to 4.11-25): Less than significant impact.
- Operational Vibration (Draft EIR pages 4.11-26 to 4.11-29): Less than significant impact.
- Private Airstrip (Draft EIR page 4.11-29): No impact.
- Cumulative Impact (Draft EIR pages 4.11-29 to 4.11-31): Less than significant impact (Noise Levels – Temporary, Stationary Noise – Operational; Operational Vibration). No impact (Private Airstrip).

Population, Housing, and Employment

- Induce Substantial Population Growth (Draft EIR pages 4.12-17 to 4.12-20): Less than significant impact.
- Displacement of Existing People or Housing (Draft EIR pages 4.12-20 to 4.12-23): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.12-23 to 4.12-24): Less than significant impact.

Public Services

- Fire Protection (Draft EIR pages 4.13-11 to 4.13-13): Less than significant impact.
- Police Protection (Draft EIR pages 4.13-21 to 4.13-23): Less than significant impact.

- Public Schools (Draft EIR pages 4.13-29 to 4.13-31): Less than significant impact.
- Library (Draft EIR pages 4.13-35 to 4.13-36): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.13-14, 4.13-23 to 4.13-24, 4.13-31, 4.13-36): Less than significant impact (Fire Protection, Police Protection, Public Schools, and Library).

Recreation

- Substantial Deterioration (Draft EIR page 4.14-12): Less than significant impact.
- Adverse Physical Impact (Draft EIR pages 4.14-13 to 4.14-14): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.14-14 to 4.14-15): Less than significant impact.

Transportation and Traffic

- Circulation System Programs and Policy (Draft EIR page 4.15-38): Less than significant impact.
- CEQA Guidelines (Draft EIR page 4.15-39): Less than significant impact.
- Emergency Access (Draft EIR pages 4.15-42 to 4.15-47): Less than significant impact.
- Cumulative Impact (Draft EIR pages 4.15-47 to 4.15-49): Less than significant impact (Circulation System Programs and Policy, State CEQA Guidelines, and Emergency Access).

Utilities and Service Systems

- Wastewater Facilities and Wastewater Treatment (Draft EIR pages 4.17-18 to 4.17-20): Less than significant impact.
- Stormwater Drainage (Draft EIR pages 4.17-20 to 4.17-21): Less than significant impact.
- Solid Waste Standards and Capacity (Draft EIR pages 4.17-51 to 4.17-52): Less than significant impact.
- Solid Waste Statutes and Regulations (Draft EIR pages 4.16-76 to 4.16-77): Less than significant impact.
- Electric Power, Natural Gas, or Telecommunications Facilities (Draft EIR pages 4.17-59 to 4.17-61): Less than significant impact.

- Cumulative Impact (Draft EIR pages 4.17-21 to 4.17-22, 4.17-53, 4.17-61 to 4.17-62): Less than significant impact.

E. Findings for Alternatives to the Project

Underlying Purpose and Project Objectives

The underlying purpose and project objectives of the CASP Update, as discussed in the EIR (Section 3.0, Project Description), are stated below. In accordance with State CEQA Guidelines Section 15124(b), the specific project objectives identified below support the underlying purpose of the Proposed Project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in the EIR, and ultimately aid the decision maker in preparing findings, and if necessary, a statement of overriding considerations.

Underlying Purpose

The underlying purpose of the CASP Update is to plan for and accommodate foreseeable growth in the City, including the Project Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of SB 375 and the Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS).

- Increase the production of affordable, mixed-income, and permanent supportive housing within the Project Area.
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
- Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future.
- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and economic insecurity.
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable housing developers; and
- While reducing overall employment capacity, preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, and new productive uses and employment spaces, such as light industrial and general commercial uses.

Alternatives

Based on the whole of the administrative record, the City finds that the EIR analyzes a reasonable range of project alternatives that would feasibly attain some of the objectives of the Proposed Project, as described in Section 5.0, Alternatives, of the Draft EIR. The six alternatives analyzed in the EIR are described and rejected as follows:

*Alternative 1 – No Project Alternative (Draft EIR pages 5.0-6 to 5.0-24)**Description of Alternative*

The “No Project” alternative involves continued implementation of the existing CASP. This alternative assumes that the City’s existing plans and policies would continue to accommodate development in accordance with existing zoning designations. The Project Area is projected to accommodate a population of 36,021 residents, 12,773 housing units, and 10,005 jobs by 2040. SCAG projects growth of the Project Area to reach 14,444 residents, 5,039 housing units, and 8,797 jobs by 2040. Therefore, population and housing growth in the Project Area would exceed SCAG’s forecasts under current plans, as would forecasted employment growth. Overall, current land use patterns limit population and housing growth in the Project Area, as compared to the Proposed Project, and would likely cause development to occur elsewhere in the region to meet the SCAG’s 2040 Citywide projections. This may increase regional emissions of air pollutants and greenhouse gases as well as increased regional energy consumption, and VMT.

Impact Summary

Alternative 1 would include less residential development capacity overall and thus less residential growth in the Project Area, as compared to the Proposed Project. Nevertheless, as with the Proposed Project, this alternative would have the potential to disturb cultural and tribal cultural resources and would also generate air pollutant emissions, ambient noise, and construction noise and vibration exceeding applicable thresholds. Finally, similar to the Proposed Project, it may result in safety related impacts due to highway off-ramp queuing. Because this alternative would not be subject to the same mitigation measures proposed in the Proposed Project, the level of impact for noise and tribal resources would be greater than under the Proposed Project despite the lower overall intensity of development in the Project Area. In addition, limiting development potential in the Project Area may induce higher levels of growth in other areas of the City and region that have fewer transit options and longer distances between housing, jobs, and services. As such, Alternative 1 may incrementally increase impacts related to energy, greenhouse gas emissions, land use and planning, population and housing, and transportation.

Finding(s)

It is found pursuant to PRC Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3), that specific economic, legal, social, technological, or other considerations, make the No Project Alternative (Alternative 1) infeasible. Therefore, the City finds that this alternative is infeasible and less desirable than the Proposed Project and rejects this alternative for anyone, some, or all, of the following reasons:

- Alternative 1 would not be consistent with the following Project objectives: Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities; and refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable housing developers.
- Alternative 1 would incrementally increase impacts related to transportation, energy and GHG emissions as compared to the Proposed Project and would have the same significant and unavoidable impacts to air quality, historic resources, construction noise and vibration, recreation and transportation safety related to freeway off-ramps.

*Alternative 2 – No Urban Village Alternative (Draft EIR pages 5.0-24 to 5.0-42)**Description of Alternative*

The “No Urban Village” alternative does not include the expansion of the residential Urban Village zone to any new parcels, but it includes other changes to the existing CASP that are likely to increase housing production, such as the establishment of the new Public Use (P2) zone and allowing 100% affordable housing in the Urban Center, Urban Innovation, and Public Use (P2) zones. Under Alternative 2 the Project Area is projected to accommodate a population of 43,523 residents, 15,434 housing units, and 9,551 jobs by 2040. SCAG projects growth of the Project Area to reach 14,444 residents, 5,039 housing units, and 8,797 jobs by 2040. Therefore, population, housing and employment growth in the Project Area would exceed SCAG’s forecasts under current plans, though the City has discretion in how it allocates growth across the City to meet other objectives and has historically allocated more growth to the Project Area than SCAG, consistent with the City’s General Plan Framework. Overall, the lack of the residential Urban Village zone expansion would limit population and housing growth in the Project Area, as compared to the Proposed Project but would result in increased job opportunities in the Project Area as commercial and light industrial uses would take the place of residential development.

Impact Summary

Alternative 2 would accommodate less residential development overall and thus accommodate less growth in the Project Area, as compared to the Proposed Project. Therefore, Alternative 2 would result in a reduced level of impact for biological resources, geology and soil, hazards and hazardous materials, public services, recreation, tribal cultural resources, and utilities/service systems compared to the Proposed Project. Impacts related to air quality, cultural resources, and noise would be reduced compared to the Proposed Project but remain significant and unavoidable with Alternative 2. Impacts related to energy, greenhouse gas emissions, land use and planning, and population and housing would be increased compared to the Proposed Project but would remain less than significant with Alternative 2. In addition, limiting development potential in the Project Area may induce higher levels of growth in other areas of the City and region that have fewer transit options and longer distances between housing, jobs, and services. As such, Alternative 2 may incrementally increase regional transportation impacts, which would remain significant and unavoidable.

Finding(s)

It is found pursuant to PRC Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3), that specific economic, legal, social, technological, or other considerations, make the High Transit Oriented Development Alternative (Alternative 2) infeasible. Therefore, the City finds that this alternative is infeasible and less desirable than the Proposed Project and rejects this alternative for anyone, some, or all, of the following reasons:

- Alternative 2 was selected because it was expected to incrementally reduce the significant unavoidable impacts of the Proposed Project with regard to air quality, cultural resources, and construction noise and vibration, as well as reduce the Proposed Project’s less than significant with mitigation impacts related to biology, geology and soils, hazardous materials, public services, recreation, tribal cultural resources, and utilities and service systems while still meeting most of the basic project objectives.

- Alternative 2 would meet the objective to preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, and new productive uses and employment spaces, such as light industrial and general commercial uses but would not reduce overall employment capacity to a greater extent than the Proposed Project.
- Alternative 2 would partially meet the following objectives, but not to the same extent as the Proposed Project:
 - Increase the production of affordable and mixed-income housing within the Project Area.
 - Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
 - Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future.
 - Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and economic insecurity.
 - Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable housing developers

Alternative 3 – Reduced Urban Village Alternative (Draft EIR pages 5.0-42 to 5.0-24)

Description of Alternative

The “Reduced Urban Village” does include the expansion of the residential Urban Village zone to new parcels, but not to the same extent as the Proposed Project. Compared to the Proposed Project, Alternative 3 does not include any new Urban Village zoning east of the Los Angeles River, or in an area along Main Street west of the Los Angeles River. Under Alternative 3, the Project Area is projected to accommodate a population of 48,527 residents, 17,208 housing units, and 9,055 jobs by 2040. SCAG projects growth of the Project Area to reach 14,444 residents, 5,039 housing units, and 8,797 jobs by 2040. Therefore, population, housing and employment growth in the Project Area would exceed SCAG’s forecasts under current plans. Overall, the reduced expansion of the residential Urban Village zone would limit population and housing growth in the Project Area, as compared to the Proposed Project but would result in increased job opportunities in the Project Area as commercial and light industrial uses would take the place of residential development.

Impact Summary

Alternative 3 would accommodate less residential development overall and thus accommodate less growth in the Project Area, as compared to the Proposed Project. Therefore, Alternative 3 would result in a reduced level of impact for biological resources, geology and soil, hazards and hazardous materials, public services, recreation, tribal cultural resources, and utilities/service systems compared to the Proposed Project. Impacts related to air quality, cultural resources, and noise would be reduced compared to the Proposed Project but remain significant and unavoidable with Alternative 3. Impacts related to energy, greenhouse gas emissions, land use and planning, and population and housing would

be increased compared to the Proposed Project but would remain less than significant with Alternative 3. In addition, limiting development potential in the Project Area may induce higher levels of growth in other areas of the City and region that have fewer transit options and longer distances between housing, jobs, and services. As such, Alternative 3 may incrementally increase regional transportation impacts, which would remain significant and unavoidable.

Finding(s)

It is found pursuant to PRC Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3), that specific economic, legal, social, technological, or other considerations, make the Land Use Mix Alternative (Alternative 3) infeasible. Therefore, the City finds that this alternative is infeasible and less desirable than the Proposed Project and rejects this alternative for anyone, some, or all, of the following reasons:

- Under Alternative 3, the Project Area would have reduced residential development capacity, as compared to the Proposed Project. Therefore, Alternative 3 was selected because it was expected to incrementally reduce the significant unavoidable impacts of the Proposed Project with regard to air quality, cultural resources, and construction noise and vibration, as well as the Proposed Project's less than significant with mitigation impacts related to biological and tribal cultural resources while still meeting most of the basic project objectives.
- Alternative 3 would meet the objective to preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, and new productive uses and employment spaces, such as light industrial and general commercial uses and would not reduce overall employment capacity to a greater extent than the Proposed Project.
- Due to the lack of increased housing without the inclusion of the full expansion of the residential Urban Village zone, Alternative 3 would partially meet the following objectives, but not to the same extent as the Proposed Project:
 - Increase the production of affordable and mixed-income housing within the Project Area.
 - Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
 - Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future.
 - Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and economic insecurity.

Environmentally Superior Alternative

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No

Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

Alternatives 1, 2, and 3 would all incrementally reduce impacts for multiple issue areas compared to the Proposed Project. This is because these alternatives would all reduce overall development levels in the Project Area. However, none of these alternatives would avoid any of the significant and unavoidable impacts of the Proposed Project. Alternative 1 would involve the lowest overall level of population growth and development in the Project Area. However, because Alternative 1 would not be subject to all of the same mitigation measures as proposed in the Proposed Project, it may result in higher greater overall impacts than the Proposed Project for certain issues, such as noise and tribal cultural resources. In addition, by limiting growth in the Project Area, Alternative 1 could cause more forecast growth and associated development to occur in other areas of the City or region that have less access to transit and longer distances between housing, jobs, and services. In this way, Alternative 1 may also result in greater overall regional VMT and associated GHG emissions.

Between the two other alternatives, Alternative 2 has the potential to reduce impacts more so than Alternative 3, although both are very similar with respect to environmental impacts. Alternative 2 would accommodate less growth in the Project Area, as compared to Alternative 3, potentially resulting in slightly reduced impacts to air quality (operational emissions), cultural resources, hazards/hazardous materials, public services, and utilities/service systems, although Alternative 2 would still result in the same impact conclusions as Alternative 3 and the Proposed Project in all impact categories. Similar to Alternative 1, limiting development potential in the Project Area may induce higher levels of growth in other areas of the City and region that have fewer transit options and longer distances between housing, jobs, and services, potentially increasing regional traffic and related GHG emissions. Additionally, while significant impacts would potentially be less under Alternative 2, impacts related to historical resources, air quality, construction noise and vibration, and transportation safety impacts related to freeway off-ramp queuing would remain significant and unavoidable. Nonetheless, Alternative 2 is identified as the Environmentally Superior Alternative as it would be expected to generate the fewest adverse impacts.

Alternatives Considered but Rejected

Section 15126.6 (c) of the CEQA Guidelines requires that an EIR identify those alternatives that were considered but rejected by the lead agency because they either did not meet the objectives of the project, were considered infeasible, or would not avoid or substantially lessen one or more significant effects of the Proposed Project.

Three additional alternatives, Alternative 4, 5, and 6, were considered that focus on reducing significant impacts to Cultural Resources should there be future redevelopment of housing at the William Mead Homes site, but the alternatives were rejected as they were considered infeasible:

Alternative 4 – Historical Rehabilitation

Under this alternative, any future work on the William Mead Homes site in the Project Area would be required to be performed in conformance with the Secretary of Interior (SOI) Standards for Rehabilitation and the California Historical Building Code (CHBC).

To rehabilitate the existing buildings, significant interior and exterior repairs would be undertaken by professionals experienced in historic buildings. Replacing in-wall plumbing and electrical systems as well as foundation bolting would require opening up all interior walls and most floors. Exterior porches and eaves would be repaired in most cases and where replacement was required, original details would be matched in kind. Original windows (where remaining) would be retrofitted and/or reglazed to provide

better insulating, air infiltration and acoustic performance. Where original windows are missing, new windows would be installed that match the original materials and profiles. Floors containing asbestos are not considered character-defining and could be removed and replaced. Lead paint on the exterior of the building could be encapsulated or gently removed without damaging the overall integrity of walls. If structural work was required at exterior walls, the design would be carried out so as to maintain historic fabric, overall massing and details as much as possible.

Outside building footprints, the blocks are landscaped with lawns, mature trees of various species, and various ornamental plants. Landscaped areas are interspersed with concrete walkways and concrete-paved areas with common clothes lines. All of these features would be retained under this alternative but would require additional site work and cleanup.

Also, achieving required accessibility modifications would require exterior site work and substantial interior remodeling at the affected units. These types of repairs would need to be achieved without affecting character-defining features, which are largely located in its exterior details, overall massing, and site arrangement.

From a constructability standpoint, it is feasible to accomplish the required repairs to the William Mead Homes site in conformance with the SOI Standards for Rehabilitation per the Alternative 4 – Historical Rehabilitation description above.

However, from a regulatory standpoint, modifying the existing buildings to provide the number of code-required mobility accessible units is not feasible, as it does not meet Title 24 Section 8.26, which stipulates that in order to avoid discrimination, accessible units must be distributed throughout projects and sites with “a sufficient range of sizes and amenities” to provide the same choice to all people regardless of their abilities. Within the two- and three-bedroom units, renovations required to meet mobility access regulations would require complete internal reconfiguration and significant diminishment of normal, usable space. With no accessible two- or three-bedroom units, or with significantly diminished accessible two and three-bedroom units, the site would not meet this requirement, thus exposing the designer and operator to significant legal liability even if the project made it through permitting. Generally speaking, units with accessibility modifications would be substandard based on normally accepted design standards for unit livability. No kitchen or bathrooms currently meet City, State or Federal accessibility standards for clearances, and alterations required to comply with the accessibility standards under Alternative 4 – Historical Rehabilitation would significantly negatively impact the livability of the units. As such, Alternative 4 was rejected due to infeasibility.

Alternative 5 – Partial Preservation

Under this alternative, various portions of the William Mead Homes site would be preserved and rehabilitated in compliance with SOI Standards. The site would be demolished in phases and redeveloped with new improved multi-family housing and amenities. Portions of the existing buildings would be maintained and improved with additional housing units and residential amenities.

There would be a total of 890 residential units on the site, including 769 affordable units and 121 units that would be preserved under this alternative. In addition, roughly 256,523 squarefeet of non-residential uses would also be developed, which includes residential support uses and general amenities.

As stated previously, rehabilitation of historic structures on the William Mead Homes site is feasible from a constructability standpoint. Also, demolishing a particular portion of the William Mead Homes site and constructing new buildings is also feasible by the same measure. However, from a regulatory

standpoint, demolishing a significant portion of a historic resource is not feasible in accordance with SOI Standards. In addition, this alternative would struggle to meet Title 24 Section 8.26 that requires mobility accessible units to be distributed throughout the site and with “a sufficient range of sizes and amenities” to provide the same choice to all people regardless of their abilities.

Newly constructed accessible units would exceed the quality and livability of those provided in the modified existing buildings, or alternatively all accessible units would be provided in the newly constructed portion of the site, thus, not meeting equitability and site distribution requirements stipulated by federal funding sources. As such, Alternative 5 was rejected due to infeasibility.

Alternative 6 – Relocation of Buildings

Under this alternative, a handful of the existing historic structures and a courtyard would be relocated from the William Mead Homes site to a new setting where they would be rehabilitated.

Multi-storied masonry buildings are among the most challenging structures to move, and the feasibility of doing so depends on many factors including the availability of suitable alternate land and size limitations of the selected travel route. If a nearby site were available and could accommodate a representative number of buildings within its boundaries, relocating the structures directly adjacent would be feasible using standard practices. Due to the limited number of available vacant parcels in the immediate vicinity, other sites for relocation would be a significant distance away. Moving a building singularly and intact to a nearby site is considered advantageous as the original fabric is preserved. However due to their size, each building would need to be at least partially if not completely disassembled to be moved a longer distance.

If it were possible to partially disassemble larger portions such as walls, floors, and roofs, the transport route would require sufficiently wide roads and vertical clearances to accommodate their size. Low underpasses, overhead lines, and tree branches would need to be avoided, thus making the selection of possible alternative locations all the narrower. If complete disassembly was necessary, each piece would have to be meticulously cataloged and marked for reassembly, though many of the original pieces would likely be destroyed in the process, causing potential loss of the historic fabric.

Given the lack of suitable sites in the surrounding vicinity that could accommodate the relocation of existing historical structures, this alternative of relocating multiple structures off-site would pose a hardship and is not capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. As such, Alternative 6 was rejected due to infeasibility.

Further, undergoing a destructive and reconstructive event would still result in the loss of historical material, in addition to the absolute loss of historical setting, which is not in accordance with Secretary of the Interior Standards. In addition, relocating the buildings would not solve their accessibility challenges as they would still face challenges to meet Title 24 Section 8.26.

A historical resource can be eligible for the National Register of Historic Places if it is determined to have significance based on established criteria. As previously mentioned, the William Mead Homes site is significant under Criterion A for its association with significant events, and under Criterion C for its exemplary architectural characteristics. However, the resources must also maintain its integrity through the survival of the key characteristics that existing during its period of significance including its location, design, setting, materials, workmanship, feeling, and association. By removing the resource from its location and setting and likely destroying many of its original materials, this alternative would not avoid a substantial adverse change to the historical resource.

No other alternatives were identified that would feasibly attain most of the basic project objectives but would also avoid or substantially lessen the significant effects of the Proposed Project. Outside of a complete moratorium on new development, none of the impacts could be reduced to below a level of significance. Any demolition or construction activity in the Project Area would have the potential to adversely affect historical resources or generate significant construction-related noise. Moreover, as previously noted, limiting development in the Project Area may simply divert more growth and development to other areas of the City, thus increasing the potential for similar impacts in other areas and increasing overall Citywide and regional VMT and associated air pollutant and GHG emissions.

3. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision-maker(s) to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the proposed project. (PRC Section 21081(b) and State CEQA Guidelines Section 15093(a).) If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable significant adverse environmental effects, the adverse environmental effect may be considered “acceptable” (State CEQA Guidelines Section 15093(a)). CEQA also requires that when a public agency approves a project that will result in the occurrence of significant and unavoidable adverse impacts to the environment, the agency must state in writing the reasons to support its action based on the certified EIR and/or other information in the record (PRC Section 21081 and State CEQA Guidelines Section 15093(b)). This “statement of overriding considerations” must be supported with substantial evidence in the record (State CEQA Guidelines Section 15093(b)).

The EIR for the CASP Update identifies significant and unavoidable impacts that would result from implementation of the Proposed Project, as shown in Section 2 of these CEQA Findings of Fact and Statement of Overriding Considerations. This Statement of Overriding Considerations is based on substantial evidence in the record, including but not limited to the Draft EIR and the Final EIR, and documents, testimony, and all other materials that constitute the Record of Proceedings.

Reasons to Support Approval of Proposed Project

After balancing the specific economic, legal, social, technological, and other benefits of the Proposed Project, the City of Los Angeles has 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 Proposed Project. The City Council finds that each of the following statements are supported by substantial evidence in the record and 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 Proposed Project:

1. The Proposed Project promotes development in a manner that would accommodate anticipated population growth for the City consistent with the City’s General Plan and the RTP/SCS prepared by SCAG. The RTP/SCS is the regional transportation and land use planning document required by federal and state agencies to document compliance with air quality attainment and greenhouse gas reduction requirements (Senate Bill 375, AB 32, SB 32). Consistent with the RTP/SCS, the Proposed Project directs growth away from lower-density neighborhoods and primarily into transit hubs and corridors. The CASP Update includes new regulations that maintain the pedestrian-scale and the existing built character of the CASP Area. The Proposed Project directs new higher- intensity development in proximity to transportation corridors and transit stations to facilitate use of public transportation, biking, and walking, consistent with state, regional and City policies aimed at reducing criteria pollutant and greenhouse gas emissions, as well as reducing overall VMT.
2. The Proposed Project supports the policies and goals of the General Plan Framework Element related to focusing growth in higher-intensity commercial centers close to transportation and services by creating concentrated, mixed-use development in proximity to bus corridors and transit stations. The Framework Element aims to focus mixed-use development around transit

stations while “protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.” The Proposed Project protects residential neighborhoods from incompatible land by focusing future growth in areas well-served by transit, which offers residents, employees, and visitors mobility choices that enable them to reduce the number and length of vehicle trips.

3. The Proposed Project supports the policies and goals of the General Plan Framework Element. The CASP Update would improve the link between the locations of land use and transportation in a manner that is consistent with the City’s Framework Element. Implementation of the CASP Update would direct growth to transit hubs and corridors, away from low density neighborhoods, which supports Framework Objective 3.7, which provides for the “stability and enhancement of multi-family residential neighborhoods.” The CASP Update would accommodate a variety of housing and commercial opportunities near rail stations and along major corridors with bus lines while maintaining zoning and development regulations in established residential neighborhoods.
4. The Proposed Project enhances the quality of life for existing and future residents by including updates to land use designations and zones that are intended to accommodate the growth anticipated in the SCAG 2040 forecast in a sustainable way. New growth and housing are to be directed along identified corridors and mixed-use transit nodes where future residents would live within walking distance of transit and commercial amenities, reducing reliance on cars. The proposed land use changes associated with the CASP Update would allow for opportunities to increase the amount of jobs and housing that would be located within close proximity to transit and to each other, which would reduce vehicle work trips, resulting in a decrease in per capita VMT in support of Assembly Bill 32 and Senate Bill 375 as well as the Framework Element objectives.
5. The CASP Update would concentrate new development within High Quality Transit Areas (HQTAs), as specified in the RTP/SCS, and in Transit Priority Areas (TPAs). By increasing development intensity near transit stations, the CASP Update would encourage a transportation mode shift from private vehicles to public transit. These characteristics are anticipated to reduce per capita GHG emissions associated with cars and light trucks. The CASP Update would be consistent with AB 32, SB 32, the 2017 Scoping Plan, SB 375, the 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.
6. The Proposed Project incorporates features to help minimize impacts to historical resources. Implementation of the CASP Update would ensure that any resource that is eligible for listing as a historical resource in SurveyLA or the Intensive Historic Resource survey is subject to a discretionary review process, and if it is determined to be historic, an environmental review process would be required to mitigate or avoid impacts to the historical resource. Environmental review would continue to be required for existing designated historic resources throughout the Project Area.
7. The Proposed Project responds to the regional housing and homelessness crisis and the corresponding increasing cost of housing in the City of Los Angeles by including policies and affordable housing incentives through the community benefits program aimed at providing affordable housing in association with new housing development and reducing homelessness. Directing new housing growth and development towards mixed- use corridors and away from

existing lower density multi-unit neighborhoods alleviates redevelopment pressure on existing multi-unit, rent stabilized housing units.

8. The Proposed Project is the product of a comprehensive public participation effort that includes public input from a range of stakeholders, including residents, homeowners, business owners, students, employees, community advocates, as well as review and input by the City Planning Commission, and the City Council in order to address prevailing housing, neighborhood, and community issues. The policies and programs for the Proposed Project are based on public input, as well as collaboration with other City departments, City stakeholders, and other governmental agencies.

Conclusion

Having (i) adopted all feasible mitigation measures, (ii) recognized all significant and unavoidable impacts, (iii) rejected other alternatives to the Proposed Project, and (iv) balanced the specific economic, legal, social, technological, and other benefits of the Proposed Project, including region and statewide environmental benefits, against the Proposed Project's potential significant and unavoidable impacts, the City Council hereby finds that the benefits of the Proposed Project outweigh and override the potential significant and unavoidable impacts for the reasons stated above and that the unavoidable adverse environmental effects may be considered "acceptable."