FINDINGS

1. Pursuant to State Government Code Section 65868, a development agreement be entered into by mutual consent of the parties. An application for a Development Agreement was filed on September 27, 2016, establishing the applicant's consent to enter into a Development Agreement.

2. The City of Los Angeles ("City") has adopted rules and regulations establishing procedures and requirements for consideration of development agreements under Citywide Development Agreement Procedures (CF 85-2313-S3). In addition, on November 19, 1992, the City Planning Commission adopted new guidelines for the processing of development agreement applications (CPC No. 86-404 MSC).

3. In accordance with Section 12.32 of the LAMC and California Government Code Section 65867, notification within a 500-foot radius of the project site was mailed out on November 22, 2016 to all occupants and property owners, neighborhood council and others as identified in the mailing affidavit located in the administrative record. Further, notice of the public hearing was also published in the Daily Journal on November 22, 2016; verification of which is provided in the administrative record. In accordance with Section 12.32-C,4(c), posting for the site was completed on June 28, 2017.

4. Pursuant to Section 65867.5 of the Government Code, the Development Agreement is consistent with the objectives, policies, and programs specified in the City of Los Angeles General Plan, including the West Adams-Baldwin Hills-Leimert Community Plan adopted by City Council on June 29, 2016. Orderly development of the project site is further governed by Department of City Planning Case No. CPC-2015-4398-GPA-ZC-HD-ZAD-CU, wherein the project is seeking a Zone and Height District Change, a Special Permission for the Reduction of Off-Street parking, and a Zoning Administrator's Determination. The Zone and Height District Change will be considered for adoption by resolution by the City Council.

5. This Development Agreement is administrative and technical in nature and will have no impact on the project under the EIR prepared for the project, Baldwin Hills Crenshaw Plaza Master Plan EIR and Errata, SCH No. 2008101017, to be considered by the City Council upon their consideration of the Zone and Height District Change. Moreover, the provisions of the Development Agreement do not grant the project or the project applicant any exceptions, variances, or otherwise allows the applicant to deviate from the required development regulations of the Code. The intent of the Development Agreement is to recognize the life of the entitlements to a specified term in exchange for the provision of public benefits. The proposed Development Agreement will not be detrimental to the public health, safety and general welfare. Approval of the Development Agreement will promote the expeditious delivery of public benefit monies directly from the Applicant to the identified parties for the provision of job training for local residents and the creation and/or acquisition of recreation and parks within the council district boundaries.

6. The Development Agreement provides extraordinary public benefits in the form of workforce housing, labor agreement, local hiring, youth workforce development, job training center, community room, commercial corridor and economic revitalization, historic preservation, and community improvements and beautification.

7. The Development Agreement complies in form and substance with all applicable City and State regulations governing development agreements.

8. Based upon the above Findings, the proposed Development Agreement is deemed consistent with public necessity, convenience, general welfare and good zoning practice.

9. **Findings of Fact (CEQA)**

I. INTRODUCTION

The Environmental Impact Report (EIR), consisting of the Draft EIR, the Final EIR, and Errata is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the project at 3650 and 3691 W. Martin Luther King, Jr. Boulevard; 3901-4145 S. Crenshaw Boulevard; 4020-4090 S. Marlton Avenue; 3701-3791 W. Santa Rosalia Drive; and 3625-3649 W. Stocker Street, Los Angeles, California 90008, consisting of the redevelopment of the existing Baldwin Hills Crenshaw Plaza, resulting in a mixed-use retail, commercial, office, hotel, and residential project totaling approximately 3,072,956 square feet of floor area.

The project site is located within the West Adams-Baldwin Hills-Leimert Community of the City of Los Angeles. The site is bordered by West 39th Street to the north, Crenshaw Boulevard to the east, Stocker Street to the south, and Santa Rosalia Drive and Marlton Avenue to the west; and bisected into two portions by Martin Luther King Jr. Boulevard. The project vicinity is highly urbanized and generally built-out. The project site is currently improved with the Baldwin Hills Crenshaw Plaza, consisting of an 833,077-square-foot enclosed retail shopping mall building, a 75,000-square-foot multi-screen movie theater, a 104,041 square feet of various commercial uses, 4,623 square feet of office uses, surface parking, and parking structures. As part of the project, the existing enclosed mall structure and cinema will be maintained and 77,933 square feet of the existing free-standing structures will be demolished. The redevelopment of the existing Baldwin Hills Crenshaw Plaza, will result in a mixed-use retail, commercial, office, hotel, and residential project totaling approximately 3,072,956 square feet of floor area.

To evaluate the environmental impacts of the project in accordance with the California Environmental Quality Act ("CEQA"), the City of Los Angeles ("City") prepared a Draft Environmental Impact Report ("Draft EIR" or "DEIR") and Errata. The project, as proposed in the Draft EIR, is the redevelopment of the existing Baldwin Hills Crenshaw Plaza, which would result in a mixed-use retail, commercial, office, hotel, and residential project totaling approximately 3,072,956 square feet of net floor area. Approximately 90,898 square feet of the existing free-standing structures would be demolished, and all of the enclosed mall structure and cinema would be retained. The Proposed Project would result in a net increase of approximately 331,838 square feet of retail/restaurant uses, 143,377 square feet of office uses, 346,500 square feet of hotel uses providing up to 400 hotel rooms, and 1,234,500 square feet of residential uses in 961 residential units consisting of 551 condominiums and 410 apartments.

The Proposed Project, following the close of the Draft EIR public circulation period on February 17, 2015, revised the design of one of the Proposed Project's six development areas. Specifically, the area proposed for development within Development Area 1 – Retail and Entertainment Area was modified to retain an existing building (Outbuilding B) which was proposed for demolition and replacement with new construction in the Draft EIR. To accommodate this change the proposed design for the Retail Village was modified. This redesign resulted in the following two changes to the Proposed Project: (1) reduction in the amount of building demolition from 90,898 square feet to 77,933 square feet, and (2) reduction in the amount of on-site parking spaces from a total of 6,957 parking spaces to 6,829 parking spaces, a reduction of 128 parking spaces. No other changes to the Proposed Project that was analyzed in the Draft EIR occurred.

The Proposed Project, following the close of the Revised Draft EIR public circulation period on March 14, 2016, reduced the maximum height for the proposed office and hotel buildings. Under the current Project, the maximum building height of the proposed office building was reduced from 145 feet to 135 feet (10 stories), whereas, the maximum building height for the proposed hotel was reduced from 135 feet to 94 feet (8 stories). The difference in height between the office and hotel buildings results from a combination of the difference in the number of stories and greater floor-to floor heights within the office building. No other changes to the Proposed Project that was analyzed in the Revised Draft EIR has occurred.

For purposes of these findings, "the Project" evaluated in these CEQA Findings shall refer to the project as described in the Final EIR and not the Original Project proposed in the Draft EIR, except as expressly noted or as context requires. Unless referring to a specific document, "EIR" shall mean the Final EIR, including the Draft EIR, the Recirculated DEIR, and the Comments and Responses document.

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The project was reviewed by the Los Angeles Department of City Planning, (serving as Lead Agency) in accordance with the requirements of the CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 30-day period commencing on November 3, 2008. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR.

Written comment letters responding to the NOP were submitted to the City by public agencies and interested organizations. Comment letters were received from various public agencies. The NOP and NOP comment letters are included in Appendix A of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the project. It also analyzed the effects of a reasonable range of five alternatives to the project, including a "No Project" alternative. The Draft EIR for the project (State Clearinghouse No. 2008101017), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 62-day public comment period beginning on December 18, 2014, and ending on February 17, 2015. On January 28, 2016, a notification of the release of the Revised Draft EIR was published by the City in the Los Angeles Times newspaper notifying interested parties of the availability of the Revised Draft EIR for the Project. This notice was also mailed to government agencies, interested parties, entities that commented on the Draft EIR, and owners and occupants residing within 500 feet of the Project Site. The notice included information on how to access the Revised Draft EIR. A NOC was also submitted on January 28, 2016, to the State Clearinghouse. The Revised Draft EIR was available for public review for 47 days, until March 14, 2016. Copies of the written comments received are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft and Recirculated Draft EIR and responded to each comment in Section III of the Final EIR.

The City released a Final EIR for the project on November 21, 2016, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the project. The Final EIR addresses the environmental effects associated with

implementation of the project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR and Recirculated Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). In addition, all individuals that commented on the Draft EIR and Recirculated Draft EIR also received a copy of the Final EIR. The Final EIR was also made available for review on the City's Department of City Planning website. Hard copies of the Final EIR were also made available at four libraries and the City Department of Planning. Notices regarding availability of the Final EIR and the Notice of Public Hearing were sent to those within a 500-foot radius of the project site, as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed public hearing for the project was held by the Hearing Officer/Deputy Advisory Agency on behalf of the City Planning Commission on December 21, 2016. On January 11, 2017, an Errata to the EIR was published on the City's website.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Environmental Review Section, 200 North Main Street, Room 750, Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. FINDINGS REQUIRED TO BE MADE BY LEAD AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Section 15091 of the CEQA Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts:

- 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. (State CEQA Guidelines Section 15091, subd. (a)(1)).

- 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. (State CEQA Guidelines Section 15091, subd. (a)(2)).

- 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. (State CEQA Guidelines Section 15091, subd. (a)(3)).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report (EIR) for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Proposed Project. For each environmental issue analyzed in the Draft EIR and Revised Draft EIR, the following information is provided:

- Description of Effects - A specific description of the environmental effects identified in the EIR.

- Project Design Features - Identified project design features or actions that are included as part of the Proposed Project (numbering of the Project Design Features corresponds to the Mitigation Monitoring Program, which is included as Section 4.0 of the Final EIR).

- Mitigation Measures - Identified mitigation measures or actions that are required as part of the Proposed Project (numbering of the Mitigation Measures corresponds to the Mitigation Monitoring Program, which is included as Section 4.0 of the Final EIR).

- Finding - One or more of three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091 as discussed in the previous paragraph.

- Rationale for Finding - A summary of the reasons for the finding(s).

- Reference - A notation on the specific section of the Draft EIR and Revised Draft EIR, which includes the evidence and discussion of the identified impact.

IV. DESCRIPTION OF THE REVISED PROJECT

A. PROJECT LOCATION AND SURROUNDING USES

The Project is proposed for the site of the existing Baldwin Hills Crenshaw Plaza regional mall (Project Site) located at 3650 Martin Luther King Jr. Boulevard. The Project Site is located at the confluence of the Crenshaw, Baldwin Hills and Leimert Park districts of the City of Los Angeles as well as adjacent to the unincorporated area of Baldwin Hills. The approximately 43-acre, roughly triangular Project Site is bordered on the north by West 39th Street, on the east by Crenshaw Boulevard, on the southeast by Stocker Street, on the southwest by Santa Rosalia Drive, and on the west by Marlton Avenue. The Project Site is bisected into two portions by Martin Luther King Jr. Boulevard and is connected by a bridge over Martin Luther King Jr. Boulevard. The portion of the Project Site located to the north of Martin Luther King Jr. Boulevard is referred to as the North Area and the portion of the Project Site located to the south of Martin Luther King Jr. Boulevard is referred to as the South Area

Regional access to the Project Site is provided by the San Diego Freeway (Interstate 405), the Santa Monica Freeway (Interstate 10), and the Harbor Freeway (Interstate 110). The San Diego Freeway is located approximately 4.5 miles due west of the Project Site and the Santa Monica Freeway is located approximately 1.5 miles to the north. The Project Site is currently bordered by fifteen existing bus stop locations along adjacent streets, and serviced by more than forty bus lines. Metro is currently constructing the Crenshaw light rail adjacent to the Project Site and a station is under construction adjacent to the Project Site to further enhance the Project Site's transit accessibility when it opens in 2019.

The Project Site is entirely surrounded by urban land uses. Specifically, the Project Site is located in an active area of the Crenshaw district that is characterized by a blend of a broad range of commercial uses, a U.S. post office, the Crenshaw YMCA, a church, as well as single- and multi-family residential uses.

B. EXISTING CONDITIONS

1. EXISTING USES

The Project Site consists of approximately 1,839,884 square feet on approximately 43 acres of land. The Project Site is currently developed with approximately 1,016,741 square feet of commercial retail, restaurant, entertainment uses, and surface parking areas to support those uses. Existing on-site development consists of an approximately 833,077-square-foot enclosed retail shopping mall building, a 75,000-square-foot multi-screen movie theater, approximately 104,041 square feet of various commercial uses, and 4,623 square feet of office uses. The mall is primarily located in the South Area and connects to the portion of the mall located in the North Area by an above-grade bridge over Martin Luther King Jr. Boulevard, which allows indoor foot travel throughout all portions of the mall. The movie theater is located in a standalone building west of the mall building at the northeast corner of Martin Luther King Jr. Boulevard and Marlton Avenue. The on-site commercial uses not located in the mall building are located in a series of buildings at various locations along the streets that border the Project Site, and are hereafter collectively referred to as the Outbuildings. A total of 10 Outbuildings are currently located on the Project Site and are individually designated as Outbuilding A through Outbuilding J (See Figure II-1, on page II-2, of the Revised Draft EIR).

2. LAND USE AND ZONING DESIGNATIONS

The Project Site is located within the West Adams–Baldwin Hills–Leimert Community Plan (Community Plan) area within the City of Los Angeles. The General Plan land use designation for the Project Site is Regional Commercial, which corresponds to the CR, C1.5, C2, C4, R3, R4, R5, RAS3, and RAS4 zones which allow for the construction of commercial and high-density multi-family residential uses. Regional Commercial uses within the Community Plan Area are limited to Height District 1 by Footnote 1 of the Community Plan Land Use Map.

The majority of the Project Site is zoned for commercial land uses with a zone designation of C2-2D (where C2 is Commercial and 2D is Height District No. 2, with development limitations). A small triangular area within the North Area of the Project Site (the northwest corner) is zoned [T][Q]C2-2D. The C2 zoning designation that applies to the entire Project Site is consistent with the Regional Commercial land use designation for the Project Site in the Community Plan. The C2 zoning designation is a commercial zone that permits a broad range of commercial land uses, including general retail uses, offices, hotels, auto sales, as well as multi-family residential, recreational and institutional uses.

The "-2D" portion of the underlying C2-2D zone pertains to Height District 2, with a site-specific Development Limitation. Pursuant to LAMC Section 12.21.1.A.2 Height District 2 permits a floor area ratio (FAR) of six times the buildable area of the lot (i.e., an FAR of 6:1). However, in the case of the Project Site, the "D" Development Limitation provides the following development restriction:

> No building or structure within the Crenshaw Mall Project Area shall exceed three times the buildable area of the lot. However, total floor area of the Redevelopment Project Area shall not exceed 1.5 times the buildable area (the condition shall be administered by the Community Redevelopment Agency).[1]

[1] Although the City of Los Angeles Community Redevelopment Agency was dissolved pursuant to the provisions of Assembly Bill X1 26, the Redevelopment Plan for the Crenshaw Redevelopment Project (which was adopted in 1984 for purposes of redeveloping the Project Site) and its requirements for development are still in effect.

The [T] and [Q] Conditions that apply to the small triangular area on the North Area provide further development restrictions for that specific lot. The [T] and [Q] conditions were established as part of a 1990 Zoning Ordinance, Ordinance No. 162,020, and have been designated as permanent conditions applicable to the Project Site. The [Q] condition applies the following parking restriction:

> Parking. Any commercial or office use of the subject property shall provide off-street parking within the center on the basis of a minimum of three parking spaces for each 1,000 square feet of gross floor area enclosed within the walls of the building, exclusive of floor area devoted to off-street parking and accessory areas.

The following [T] conditions apply to the property:

1. Dedication and improvement of Marlton Avenue and 39th Street adjoining the subject property to the satisfaction of the City Engineer, including but not limited to:

    a. Access ramps for the handicapped;

    b. Construction of sidewalks and repairing and replacing any broken or off-grade curbs, gutters, and sidewalks, together with landscaping, trees, and tree wells.

    c. Suitable transitions to join existing improvements;

    d. Construction of sewers and drainage facilities.

2. Installation of street lights to the satisfaction of the Bureau of Street Lighting;

3. Approval of a parking area and driveway plan by the appropriate District Office of the Bureau of Engineering and the Department of Transportation;

4. Certification by the City Engineer that the provisions of the Flood Hazard Ordinance have been considered and appropriate measures have been taken;

5. Approval of a plot plan by the Fire Department for the subject approval.

6. Evidence that any necessary arrangement be made with the appropriate cable television franchise holder to assure that cable television facilities will be installed in City rights-of-way in same manner as is required of other facilities, pursuant to Municipal Code Section 17.065-N to the satisfaction of the Department of Transportation.

7. Dedication of land or payment of fees to be provided to the satisfaction of the Recreation and Parks Department pursuant to Municipal Code Section 12.33, or any amendment thereto.

The Project Site is also located within the Redevelopment Plan for the Crenshaw Redevelopment Project, which was adopted by the City of Los Angeles Community Redevelopment Agency (CRA/LA) in 1984 (Redevelopment Plan). The Redevelopment Plan was specifically adopted for the purpose of redeveloping the Baldwin Hills Crenshaw Plaza shopping center. While Assembly Bill X1 26 dissolved all California redevelopment agencies,

including the CRA/LA, the dissolution of the agencies did not dissolve the redevelopment plans. Therefore, the Redevelopment Plan and its requirements for development are still in effect. The Redevelopment Plan designates the Project Site for Regional Commercial land uses. The Redevelopment Plan allows a maximum floor area ratio of 3:1 (or approximately 5,519,923 square feet of floor area[2]) and sets a limitation on the number of buildings in the Project Area (not to exceed 350), as well as the number of dwelling units (not to exceed 1,600).

The Project Site is also located within the Conditional Use Approval for Sale of Alcoholic Beverages Specific Plan (the "Specific Plan"). The Specific Plan (adopted September 13, 1997) was established to implement conditional use approval for establishments dispensing for sale or other consideration alcoholic beverages, including beer and wine, for off-site consumption.

C. PROJECT CHARACTERISTICS

The Proposed Project is the redevelopment of the existing Baldwin Hills Crenshaw Plaza, which would result in a mixed-use retail, commercial, office, hotel, and residential project totaling approximately 3,072,956 square feet of net floor area as defined by the City of Los Angeles Planning and Zoning Code. Approximately 77,933 square feet of the existing free-standing structures (Outbuildings A, C, and E through K) would be demolished, and all of the enclosed mall structure and cinema as well as Outbuildings B and D would be retained.[3] As compared to the current conditions, the Proposed Project would result in a net increase of approximately 2,056,215 square feet of floor area across the entire Project Site. Furthermore, the Proposed Project would result in a net increase of approximately 331,838 square feet of retail/restaurant uses, 143,377 square feet of office uses, 346,500 square feet of hotel uses providing up to 400 hotel rooms, and 1,234,500 square feet of residential uses in 961 residential units consisting of 551 condominiums and 410 apartments. Development of the Proposed Project is described as occurring within a total of six development areas (Development Areas 1 – 6).

The Proposed Project combines the retention of the existing mall building, the stand-alone movie theater building, and two Outbuildings (Outbuildings B and D), with new development that creates a pedestrian-oriented mixed-use development that complements and enhances the existing on-site uses. The new commercial uses proposed for development include a Retail Village located around the intersection of Stocker Street and Crenshaw Boulevard; a hotel located to the south of the Retail Village and existing mall building; an office building at the northern edge of the Project Site at the southwest corner of Crenshaw Boulevard and 39th Street; and street-front retail uses along Crenshaw Boulevard, Martin Luther King Jr. Boulevard, and Marlton Avenue. The Proposed Project also introduces residential uses to a previously commercial-only site, with residential apartments located within the southwest corner of the Project Site along Santa Rosalia Drive and Marlton Avenue and residential condominium and apartment units located above the street-front retail uses in the North Area.

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[2] Pursuant to Section 412 of the Redevelopment Plan for the Crenshaw Redevelopment Project, building intensities within the Project Area shall not exceed three times the buildable area of the Project Area, and shall apply in aggregate to the Project Area, not individual building sites.

[3] The Project Site's existing site plan, as shown in Figure III-1, Existing and Proposed Site Plan, on page III-3, of the Draft EIR, identifies 11 Outbuildings that are referenced as Outbuildings A-K. As the Revised Draft EIR modified the boundaries of Development Area 1, Outbuilding B was excluded from the list of existing Outbuildings at the Project Site. Thus, the existing site plan as shown in Figure II-1, Existing and Proposed Site Plan, on page II-2, of the Revised Draft EIR, identifies a total of 11 Outbuildings that are referenced as Outbuildings A-J (Outbuilding B that was shown in the Draft EIR was eliminated from the list and the references to the remaining Outbuildings was adjusted to reflect this deletion). For the purposes of these findings, the referencing of the existing Outbuildings located on the Project Site uses the referencing system that was set forth in the Draft EIR, as described above.

The Proposed Project seeks to reinvent the Project Site by introducing a diverse mix of new uses that complement and enhance the existing enclosed mall and theater. The Proposed Project also seeks to activate the streets surrounding the Project Site and improve the pedestrian and transit character of the Project Site by providing a pedestrian-oriented design that integrates the Project Site with the existing pedestrian pathways that are part of the streets that border the Project Site. The enclosed mall would remain the predominant land use within the South Area and a variety of new land uses and shopping environments would be created to establish a mixed-use, pedestrian- and transit-friendly site. Most notable of which would be the addition of a new Retail Village. The southern half of the mall is currently set back as much as 400 to 500 feet from Crenshaw Boulevard and Stocker Street with surface parking and a parking structure occupying the majority of this space. Under the Proposed Project, this area, with the exception of Outbuildings B and D, would be replaced with the pedestrian-oriented Retail Village that would both enhance the pedestrian environment along these streets (i.e., activate pedestrian activity along Crenshaw Boulevard) and provide a shopping experience that would complement the existing shopping opportunities found within the enclosed mall. The Retail Village is anticipated to consist of a series of buildings located within a plaza that is accessible from Crenshaw Boulevard as well as from Stocker Street and the mall.

Contributing to the Proposed Project's introduction of a diversity of uses is the proposed mid-rise hotel located to the south of the enclosed mall and the proposed Retail Village. The Project also proposes to introduce residential uses within the South Area around the intersection of Santa Rosalia Drive and Marlton Avenue. As part of the Proposed Project, all existing surface parking would be removed from the South Area and new parking facilities constructed. The new parking facilities will occur as semi-subterranean and above-grade parking structures. The design for the parking structure facades includes a green wall system, a modulation framework grid typically wall-mounted to exterior structures to create an aesthetic, living green façade. Landscaping will also promote walkability among the structures and across the Project Site by creating pedestrian pathways. At full Project build out, only two surface parking areas would exist, one located along Santa Rosalia Drive to serve the hotel and Outbuilding D, and one located behind Outbuilding B that would be accessible from Stocker Street.

Under the Proposed Project, all of the existing development within the North Area, with the exception of the existing Macy's building, would ultimately be removed and revitalized with a series of mixed-use retail and residential buildings with a mid-rise office building at the northern edge of the property which would create a northern gateway to the Project Site. The mixed-use buildings would provide apartment and condominium units above street front retail uses along Crenshaw and Martin Luther King Jr. Boulevards, which would be designed to enhance the pedestrian environment found along these streets as they border the North Area (i.e., activate pedestrian activity along Crenshaw Boulevard). Within the area of the mixed-use buildings, parking would be provided in a four-level parking structure, with one level below grade, one level at grade and two levels above grade. The residential uses would be developed on a deck placed on top of the upper parking level, and each mixed-use building would include a landscaped courtyard within which various types of recreational amenities would be provided. The mixed-use buildings would also be connected via two landscaped plazas each incorporating a series of light wells allowing natural light to pass through to the parking levels below.

The Proposed Project, following the close of the Draft EIR public circulation period on February 17, 2015, revised the design of one of the Proposed Project's six development areas. Specifically, the area proposed for development within Development Area 1 – Retail and Entertainment Area (hereafter referred to as the Retail Village) was modified to retain an existing building (Outbuilding B) which was proposed for demolition and replacement with new construction in the Draft EIR. Outbuilding B is currently occupied by a restaurant and retail uses

and is located mid-block along the north side of Stocker Street between Crenshaw Boulevard and Santa Rosalia Drive. To accommodate this change, the proposed design for the Retail Village was modified. In the Draft EIR, the Retail Village in the area of Outbuilding B extended to include frontage along Stocker Street, whereas under the currently Proposed Project, the Retail Village has been designed to wrap around and complement the existing use pattern associated with Outbuilding B, which would now remain in its current configuration under the currently Proposed Project. This would be achieved by locating new retail uses to the north of Outbuilding B and providing at-grade parking below the plaza level of the Retail Village that would be located across from the existing surface parking lot that would continue to serve Outbuilding B. This redesign, including the retention of Outbuilding B, would also result in the following two changes to the Proposed Project: (1) reduction in the amount of building demolition from 90,898 square feet to 77,933 square feet, and (2) reduction in the amount of on-site parking spaces from a total of 6,957 parking spaces to 6,829 parking spaces, a reduction of 128 parking spaces.

The Proposed Project, following the close of the Revised Draft EIR public circulation period on March 14, 2016, the maximum height for the proposed office and hotel buildings was reduced. Under the currently Proposed Project, the maximum building height of the proposed office building was reduced from 145 feet to 135 feet (10 stories), whereas, the maximum building height for the proposed hotel was reduced from 135 feet to 94 feet (8 stories). The difference in height between the office and hotel buildings results from a combination of the difference in the number of stories and greater floor-to-floor heights within the office building.

No other changes to the previously Proposed Project would occur under the currently Proposed Project.

V. IMPACTS DETERMINED IN THE INITIAL STUDY TO HAVE NO IMPACTS or LESS THAN SIGNIFICANT IMPACTS

The City prepared an Initial Study in 2008 that evaluated the Project Applicant's development program for the Project Site at that time. This Initial Study determined that an Environmental Impact Report (EIR) was required and the City issued a Notice of Preparation (NOP) of an EIR in October 2008. Following the close of the NOP's public review period, the Project Applicant reduced the development program from a total of 3,501,000 square feet, including existing on-site development, to a total of 3,072,956 square feet, which also includes existing on-site development. This reduced development program was the subject of the Draft EIR released by the City in December 2014. The subject of the December 2014 Draft EIR is hereafter referred to as the "Original Project." The development program for the Original Project also included the demolition of 90,898 square feet of existing floor area. Following the close of the Draft EIR's public review period in February 2015, the Project Applicant revised the Original Project's site plan. While the amount of total on-site development remained the same as what was analyzed in the Draft EIR (3,072,956 square feet, including existing on-site development), the amount of proposed demolition was reduced from 90,898 square feet to 77,933 square feet. This revised site plan, including the reduction in on-site demolition, is hereafter referred to as the "currently Proposed Project," and was the subject of the Revised Draft EIR that was released by the City in January 2016.

The environmental analyses presented in the 2008 Initial Study represent a conservative analysis of the potential environmental impacts of the currently Proposed Project, as the 2008 Initial Study is based on a greater level of on-site development than what is proposed under the currently Proposed Project.

The 2008 Initial Study is included in Appendix A-1 of the Draft EIR. The Initial Study provides a discussion of the potential environmental impacts by topic and the reasons that each topical area is or is not analyzed further in the Draft EIR. As further described in the Initial Study, the City determined that the Original Project would not result in significant impacts related to Agricultural Resources; Air Quality (related to odors); Biological Resources; Cultural Resources (related to the disturbance of human remains); Geology and Soils (related to landslides, erosion, and septic system soils); Hazards and Hazardous Materials (with the exception of Proposed Project proximity to schools); Hydrology and Water Quality (with the exception of groundwater supplies and recharge, urban runoff, water quality, and the Project Site's location within a potential dam inundation area); Land Use and Planning; Mineral Resources; Noise (related to airports and airstrips); Population and Housing (related to the displacement of people and off-site replacement housing); and Transportation and Circulation (related to air traffic, hazardous design features, and emergency access).

The rationale for the conclusion that no significant impact will occur in each of these issue areas is summarized below (and set forth in Appendix A-1 of the Draft EIR). The City finds that this rationale is equally applicable to the currently Proposed Project since there are no additional environmental impacts with regard to the issues discussed in the Initial Study for the Original Project. Based on that rationale and other evidence in the administrative record, the City finds and determines that the Proposed Project will not result in any significant impacts in the following environmental impact categories and that no mitigation measures are needed.

A. ENVIRONMENTAL CATEGORIES THE INITIAL STUDY DETERMINED HAD NO IMPACTS

The Initial Study determined that the Original Project would have no impact in the following environmental categories. The City finds that the rationale set forth in the Initial Study is equally applicable to the Proposed Project, and the Proposed Project similarly will have no impact on the following environmental issues for the reasons set forth below and as explained in more detail in the Initial Study.

1. AGRICULTURAL RESOURCES

The Project Site is located in the urbanized area of Los Angeles and does not include any State-designated agricultural lands. Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to non-agricultural use.

The Project Site is not currently zoned for agricultural use nor would the Proposed Project involve the conversion of agricultural land to another use. Neither the Project Site nor any surrounding properties are currently utilized for agricultural activities. Therefore, the Proposed Project would not involve changes in the existing environment that would result in the conversion of Farmland to non-agricultural use.

2. BIOLOGICAL RESOURCES

The Project Site and the surrounding area are currently dominated by dense urban development and do not contain any significant areas of natural open space or areas of significant biological resource value. No candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW), formerly the California Department of Fish and Game (CDFG), or the U.S. Fish and Wildlife Service (USFWS) were found or are expected to occur on the Project Site, as the Project Site supports no habitat for such species. Therefore, no impacts to candidate, sensitive, or special status species would occur.

No riparian or other sensitive habitat areas are presently located on or adjacent to the Project Site. Therefore, the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

The Project Site does not support riparian or wetland habitat, or "waters of the United States," as defined by Section 404 of the Clean Water Act. Therefore, the Proposed Project would not have an adverse effect on Federally protected wetlands.

No wildlife corridors are located on the Project Site or in the project area due to the presence of existing dense urban development. Therefore, the Proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites.

None of the trees listed in the City's Protective Tree Ordinance occur on the Project Site. As such, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Therefore, the Proposed Project would not conflict with the provisions of any adopted conservation plan.

3. CULTURAL RESOURCES – HUMAN REMAINS

The Project Site and immediately surrounding area is developed with urban land uses. No known human burials have been identified on the Project Site or vicinity. Therefore, the Proposed Project would not disturb any human remains, including those interred outside of formal cemeteries.

4. GEOLOGY AND SOILS - DISPOSAL OF WASTEWATER

The Project Site is located in an area that is served by a City-operated wastewater collection, conveyance, and treatment system. No septic tanks or alternative disposal systems would be required nor are they included as part of the Proposed Project. Therefore, no impact would occur relative to the Proposed Project having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

5. HAZARDS AND HAZARDOUS MATERIALS

The Project Site is not located within an airport land use plan boundary and the nearest public airports to the Project Site, the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), are over 7 miles and 6 miles away, respectively. Therefore, the Proposed Project would not result in an airport-related safety hazard for people residing or working in the Project area, and no impact would occur in this regard.

There are no private airstrips in the vicinity of the Project Site and the Project Site is not located within a designated airport hazard area. Therefore, the Proposed Project would not result in airport-related safety hazards for the people residing or working in the area.

The Project Site is not located in an area containing any wildlands or high fire hazard terrain or vegetation. As such, Proposed Project development would not expose people or structures to a

significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

6. HYDROLOGY AND WATER QUALITY – PLACEMENT OF STRUCTURES WITHIN 100-YEAR FLOOD PLAIN AND OTHER FLOOD RISK

Per the City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps: 100-Year & 500-Year Flood Plains in the City of Los Angeles, the Project Site is within the 100-year flood hazard area and is already developed. However, this issue was further addressed in the EIR, which determined that impacts would be less than significant (See Section IV.G).

Per the mapping of Inundation & Tsunami Hazard Areas in the City of Los Angeles, the Project Site is located in a potential inundation area. This issue was further addressed in the EIR which determined that due to project design, drainage plans, and location, risks associated inundation would be considered remote and impacts would be less than significant (See Section IV.G). There are no potential sources of mudflow in the Project area.

7. LAND USE AND PLANNING

a) DIVIDING AN ESTABLISHED COMMUNITY

The Proposed Project would not involve the closure of any streets or sidewalks, and no separation of uses or disruption of access between land use types would occur. Instead, the Project seeks to revitalize and add to the Baldwin Hills Crenshaw Plaza, which includes a bridge over Martin Luther King Jr. Boulevard to connect the two areas comprising the Project Site. Under the Proposed Project, the Project Site would be reconfigured from one that is currently oriented toward motor vehicles to one that is oriented to pedestrians and public transit, while interfacing and activating the adjacent streets and connecting with existing bus transit and future (2019) light rail transit. Given the mix of uses in the Project vicinity, and the existing bridge connection, the Proposed Project would not be expected to physically divide an established community.

b) CONFLICT WITH HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN

The Project Site is located in the urbanized Los Angeles area and is not part of any habitat or natural community conservation plan. Additionally, the Project Site is zoned for Commercial and Residential land uses. Therefore, the Proposed Project would not conflict with the provisions of any adopted conservation plan. No mitigation measures are required.

8. MINERAL RESOURCES

Per the City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, the Project Site is not known to contain any significant mineral resources. Further, the Project Site is designated for commercial and residential uses. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. Therefore, no impacts to mineral resources would occur as a result of the Proposed Project.

9. NOISE - AIRPORTS AND AIRSTRIPS

The Project Site is not located within an airport land use plan or within two miles of an airport or private airstrip. Therefore, the Proposed Project would not expose the future on-site population in the Project area to excessive noise levels from airport use.

10. POPULATION AND HOUSING- REPLACEMENT HOUSING

The Project Site is currently used for commercial purposes and does not contain any existing housing. The Proposed Project would not displace any existing housing, or require the construction of replacement housing elsewhere. As such, no impact would occur in this regard as a result of the Proposed Project.

11. TRANSPORTATION AND CIRCULATION - AIR TRAFFIC

The Proposed Project does not include any aviation-related uses. As such, the Proposed Project would not result in a change in air traffic patterns including increases in traffic levels or changes in location that would result in substantial safety risks. No impact would occur in this regard as a result of the Proposed Project.

B. ENVIRONMENTAL CATEGORIES THE INITIAL STUDY DETERMINED HAD LESS THAN SIGNIFICANT IMPACTS

The Initial Study determined that the Original Project would have less than significant impacts in the following environmental categories. The City finds that the rationale set forth in the Initial Study is equally applicable to the Proposed Project, and the Proposed Project similarly will have less than significant impact in these areas for the reasons set forth below and as explained in more detail in the Initial Study.

1. AIR QUALITY – ODORS

The Proposed Project may have the potential to generate odors commonly associated with residential, retail and restaurant uses. Such odors are common in urban environments and would be controlled by proper ventilation and HVAC systems. The only anticipated chemicals to be used during the construction and operation of the Proposed Project would be conventional cleaning products for maintenance purposes. Additionally, the Proposed Project would not involve the removal or transport of any materials that would create objectionable odors. Impacts with regard to odors would be less than significant and no mitigation measures are required.

2. GEOLOGY AND SOILS – LANDSLIDES AND SOIL EROSION

Per the City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps: Landslide Inventory & Hillside Areas in the City of Los Angeles, the Project Site is not located on, but is near a landslide inventory and hillside area. However, the probability of landslides, including seismically induced landslides, is remote. However, this issue was further addressed in the EIR (See Section IV.E).

The potential for soil erosion during the construction and operation of the Proposed Project is relatively low due to the generally level topography of the Project Site. With implementation of the applicable grading and building permit requirements and the application of Best Management Practices (BMPs), a less-than-significant impact with respect to erosion or loss of topsoil would occur.

3. HAZARDS/HAZARDOUS MATERIALS

a) ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS

The residential and commercial uses associated with the Proposed Project would use minimal amounts of hazardous materials for routine cleaning and, as such, would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials. Therefore, impacts would be less than significant.

b) UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS

The types of activities and materials associated with the residential, commercial, office and retail uses during Proposed Project operation would not involve the use or transport of hazardous materials other than small office supplies, janitorial products and cleaning agents. Therefore, the Proposed Project would not create a significant environmental hazard to the public or environment through foreseeable upset or accidental release of hazardous materials during operation. As such, impacts were anticipated to be less than significant; however, this issue was further addressed in the EIR (See Section IV.F).

c) LOCATED ON A SITE INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES

A Phase I Environmental Site Assessment (ESA) was prepared for the Proposed Project to determine whether any hazardous materials sites in the Project vicinity would create a significant hazard to the public or the environment if the Proposed Project is constructed. It was found that the mall area of the Project Site holds two 55-gallon steel drums containing hydraulic oil for the elevators. These drums had no secondary containments and no leaks. The only other hazardous materials found on-site were small office supplies, janitorial products, and cleaning agents. These products would have a minimal impact on the environment. Possible impacts with respect to the hydraulic oil and other hazardous materials were anticipated to be less than significant; however, these impacts were addressed in the EIR (See Section IV.F).

d) INTERFERENCE WITH ADOPTED EMERGENCY RESPONSEPLAN OR EMERGENCY EVACUATION PLAN

Construction of the Proposed Project is not anticipated to substantially impede public access or travel upon public rights-of-way but may interfere with an adopted emergency response plan or emergency evacuation plan. Access to the Project Site is anticipated to continue to be provided via Marlton Avenue, Santa Rosalia Drive, Stocker Street, Crenshaw Boulevard and Martin Luther King Jr. Boulevard. Furthermore, traffic patterns and Project Site access may be altered temporarily during construction. However, access and traffic patterns will have to be confirmed in the traffic and circulation plans. Further, a construction traffic plan was identified in the EIR. For these reasons, construction and operation of the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

4. HYDROLOGY AND WATER QUALITY

a) VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS

The Proposed Project would not violate any water quality standards or waste discharge requirements. However, this issue was further addressed in the EIR (See Section IV.G).

b) DRAINAGE PATTERN ALTERATION AND SURFACE RUNOFF

The Project Site is located in a highly urbanized area and is covered with paved surface parking lots and retail/commercial buildings. The Project Site is served by existing City storm drain infrastructure. Furthermore, the Project Site is not located adjacent to any stream or river, and Proposed Project runoff would continue to drain into the existing City storm drain infrastructure. Under the Proposed Project, surface run-off would not increase to the extent to cause flooding on- or off-site. Impacts pertaining to drainage pattern modification and runoff would be less than significant. However, hydrology and water quality impacts were further addressed in the EIR (See Section IV.G).

c) PLACE HOUSING IN 100-YEAR FLOOD PLAIN

The Project Site is within a 100-year flood hazard area, as defined in the Environmental and Public Facilities Maps: 100-Year & 500-Year Flood Plains in the City of Los Angeles. However, the Project Site is already developed and infrastructure has been completed to reduce the risk of flooding. While impacts were anticipated to be less than significant, impacts with regard to this issue were further addressed in the EIR (See Section IV.G).

5. LAND USE AND PLANNING – PLAN CONSISTENCY

The Proposed Project is subject to Southern California Association of Governments, the City of Los Angeles General Plan, the West Adams – Baldwin Hills – Leimert Community Plan (Community Plan), the Crenshaw Redevelopment Plan (Redevelopment Plan), the Conditional Use Approval for Sale of Alcoholic Beverages Specific Plan and the City of Los Angeles Municipal Code. The Proposed Project would not conflict with any land use plan, policy or regulation. Instead, the Proposed Project compliments the land use plans by revitalizing a redevelopment project area, creating a walkable community, and providing ready access to public transportation. As such, impacts were anticipated to be less than significant. However, the Proposed Project includes approval of a General Plan Amendment to ensure consistency with the Community Plan designation for the Project Site, which is Regional Commercial. As such, the Proposed Project's consistency with existing applicable land use plans, policies and regulations were further addressed in the EIR (See Section IV.H).

6. POPULATION AND HOUSING – DISPLACE NUMBER OF PEOPLE

The Project Site is currently used for commercial purposes and does not house any residents. Upon completion, the Proposed Project is anticipated to generate on-site jobs and up to 961 units of multi-family housing. Some retail job displacement may occur during construction but many existing retailers within the Project Site will remain open during construction which would minimize job displacement. While these impacts would be less than significant, population, housing and employment impacts were addressed in the EIR (See Section IV.J).

7. TRANSPORTATION AND CIRCULATION – HAZARDOUS DESIGN FEATURES AND EMERGENCY ACCESS

a) SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE

The Proposed Project does not involve significant changes to the design features of roadways and would not include incompatible uses. Minor changes to traffic patterns may occur during the construction period of the Proposed Project, but would be limited to off-peak hours when possible. Impacts would be less than significant in this regard.

b) RESULT IN INADEQUATE EMERGENCY ACCESS

The Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles during both construction and operation. Impacts would be less than significant in this regard as a result of the Proposed Project.

VI. IMPACTS THE EIR FOUND TO BE LESS THAN SIGNIFICANT

In the Initial Study for the Original Project, the City also identified impacts that required further study in an EIR. The impact areas discussed in this Section VI were determined to be less than significant in the Draft EIR and the Revised Draft EIR. These topics include the following: Aesthetics (Visual Character/Views, Light, Glare, and Shading); Air Quality (Plan Consistency, Localized Operational Emissions, and Toxic Air Contaminants); Greenhouse Gas Emissions; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Surface Water Quality; Land Use and Planning; Population, Housing, and Employment; Public Services (Fire Protection, Police Protection, Schools, Recreation and Parks, and Libraries), Transportation and Circulation (Regional Transportation Systems and Parking), and Utilities (Wastewater and Energy).

To the extent that the less-than-significant conclusions were reached in the Draft EIR, the City finds that the determinations in the Draft EIR are equally applicable to the currently Proposed Project since no additional environmental impacts beyond those discussed in the Draft EIR were identified in the Revised Draft EIR. Based on the analysis in the Draft EIR and the Revised Draft EIR and other evidence in the administrative record relating to the Proposed Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed.

A. AESTHETICS

1. DESCRIPTION OF EFFECTS

a) VISUAL CHARACTER

During construction, the Project Site's visual appearance would be altered due to site preparation activities (i.e., grading, excavation, and soil stockpiling) and the construction of the Proposed Project buildings as well as construction equipment and materials and construction-related temporary facilities. Construction activities for the Proposed Project would be most visible to occupants of adjacent land uses, and pedestrians and motorists on the streets along the perimeter of the Project Site.

The visual character of the Proposed Project during operations are based, in part, on conceptual renderings and building elevations prepared for the Proposed Project, which are intended to depict key features relevant to the assessment of aesthetic impacts, such as building height, density, massing, materials, articulation, and setback, as well as signage and landscaping (see Figure II-5 through Figure II-12, Figure II-19 through Figure II-24, and Figure II-26 in Section II, Project Description, of the Revised Draft EIR).

The existing on-site uses are largely fenced off from the surrounding land uses offering isolated entry points into the Project Site. The Proposed Project seeks to reinvent the Project Site by introducing a diverse mix of new uses that complement and enhance the existing enclosed mall and theater. The Proposed Project combines the retention of the existing mall building, the stand-alone movie theater building, and two other existing on-site buildings (Outbuildings B and D), with new development that creates a pedestrian-oriented mixed-use project that complements and enhances the existing on-site uses with an emphasis on creating a network of walkable landscaped corridors that link visitors, residents, and employees throughout the Project Site and to the adjacent community. The new commercial uses proposed for development include a Retail Village with pedestrian access from Crenshaw Boulevard and Stocker Street located around the intersection of Stocker Street and Crenshaw Boulevard; a hotel located to the south of the Retail Village and existing mall building; an office building at the northern edge of the Project Site at the southwest corner of Crenshaw Boulevard and 39th Street; and street-front retail uses along Crenshaw Boulevard, Martin Luther King Jr. Boulevard, and Marlton Avenue. The Proposed Project also introduces residential uses to a previously commercial-only site, with residential apartments located within the southwest corner of the Project Site along Santa Rosalia Drive and Marlton Avenue and residential condominium and apartment units located above the street-front retail uses in the North Area.

The Proposed Project's conceptual plan includes several stepped buildings with variations in building heights and setbacks, openings in the building plane, and integrated open space, plazas, and landscaping to provide architectural variation and create visual interest throughout the Project Site. The new buildings would replace older, underutilized buildings with an architectural style, under the Proposed Project's conceptual plan, which is visually compatible with other newer or recently renovated buildings in the area (e.g., the six-story residential condominium development on Santa Rosalia Drive). Parking structure façades located at the same grade as the adjoining street level would be covered with a green wall system. These features would serve to minimize the visual massing of the proposed structures by providing three-dimensional qualities to the building planes and creating vertical and horizontal variation, effectively integrating the Proposed Project into the existing urban environment. Furthermore, the Proposed Project incorporates numerous design elements that are recommended in the Citywide Design Guidelines and Walkability Checklist for the purpose of creating high-quality, pedestrian-friendly, urban developments.

b) VIEW IMPACTS

With regard to views of the Project Site, the Project Site is located in a highly urbanized area with no natural features or scenic resources that would be considered prominent. The Proposed Project's new structures would offer variations in colors, massing, and forms, thus promoting visual interest within views containing the Project Site. The Proposed Project site plan and layout would promote a pedestrian-oriented streetscape along with new landscaping and pedestrian amenities to ensure quality views of the Project Site.

With regard to off-site views, valued public views of natural resources or man-made iconic features in the Project area include the downtown Los Angeles urban skyline and the Hollywood Hills, including the Hollywood sign and the Griffith Park Observatory. Only intermittent views of

these features can be seen along public roadways in the immediate area. With regard to views from scenic highways, Crenshaw Boulevard is designated by the City of Los Angeles as a Scenic Principal Major Highway. Views of the downtown skyline are currently available looking northeast from Crenshaw Boulevard. However, the Proposed Project would be constructed on the west side of Crenshaw Boulevard. The remaining roadways near the Project Site are not designated scenic highways under the West Adams–Baldwin Hills–Leimert Community Plan.

The Project Applicant has reduced the building height of the two tallest Proposed Project buildings, the proposed office building located at the northern end of the Project Site and the proposed hotel building located near the southern end of the Project Site, to reduce potential view impacts from private residential vantage points, primarily within the View Park/Baldwin Hills Estates/Windsor Hills communities located to the south of the Project Site, which are located at topographic elevations above that of the Project Site. Relative to the Original Project, the Project Applicant has reduced the building height for the proposed office building from 145 to 135 feet (10 stories) and the building height for the proposed hotel from 135 feet to 94 feet (8 stories) as part of the Proposed Project.[4]

In response to comments on the Draft EIR and the Revised Draft EIR, three locations within the View Park/Baldwin Hills Estates/Windsor Hills area were selected for detailed analysis about the Proposed Project's potential to impact the views available from the private residential vantage points within these areas. This analysis concluded that the Proposed Project would contribute to the pattern of urban development that defines the character of the near- and mid-range portions of the viewshed available from the three analysis locations. With regard to long-range views, the view simulations show that the Proposed Project, with the reduced building heights for the proposed hotel and office buildings, would not obstruct existing views of the identified view resources (downtown Los Angeles skyline and views of the Santa Monica Mountains, including the individual view resources of the dome of the Griffith Observatory and the Hollywood sign).

c) LIGHT AND GLARE

The Project Site is located in an urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (i.e., light emanating from the interior of structures which passes through windows) and automobile headlights. In addition, the existing buildings on the Project Site currently contain a variety of lighting sources. With implementation of the Proposed Project, the Project Site would be illuminated with both indoor and outdoor lighting. Security lighting would be provided along the perimeter of all structures, parking areas, in stairwells, along walkways, and in open space areas. In accordance with the Project Design Features, all lighting would either be shielded and focused on the Project Site or located completely indoors. In addition, streetlights would be provided at appropriate intervals along internal roadways.

d) SHADING

Under the Proposed Project, the greatest extent of off-site shading is generated by the proposed office building located at the northern end of the Project Site and the proposed hotel building located near the southern end of the Project Site during the morning and afternoon hours. However, as explained below, shade impacts would not exceed the established City of Los Angeles thresholds of more than three hours between the hours of 9:00 A.M. and 3:00 P.M.

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[4] The difference in height between the office and hotel buildings results from a combination of the difference in the number of stories and greater floor-to-floor heights within the office building (i.e., the office building would be up to 10 stories with an average floor-to-floor height of 13.5 feet, compared to the hotel which would be up to 8 stories with an average floor-to-floor height of 11.75 feet).

PST on the winter solstice, or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. PDT during the fall and spring equinoxes.

e) CONSISTENCY WITH REGULATORY FRAMEWORK

The Proposed Project would have a potentially significant impact if it would substantially conflict with applicable guidelines and regulations related to aesthetics and visual quality where significant impacts on the environment are involved.

f) CUMULATIVE IMPACTS

A total of 39 related projects have been identified in the study area, and most of the related projects are located sufficiently distant from the Project Site to not result in cumulative aesthetic impacts. Similar to the Proposed Project, each related project would be designed to be substantially consistent with the General Plan Framework and the West Adams–Baldwin Hills–Leimert Community Plan Urban Design policies. Those related projects located nearby the Project Site are located within the same viewshed as the Proposed Project, which includes the man-made and natural view resources described above. Development of the Proposed Project as well as the other related projects would cumulatively introduce new or expanded sources of artificial light in an existing highly urbanized area of the City of Los Angeles. With regard to glare, it is also anticipated that the related projects would be subject to discretionary review by the City, and as part of this process, building materials would not be permitted that would create significant glare impacts. The related projects, depending on their final designs, could result in shading of sensitive receptors that exceed the standards established within the LA City CEQA Thresholds Guide.

g) AESTHETIC IMPACTS ARE LESS THAN SIGNIFICANT ACCORDING TO SB 743

Furthermore, CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Pub. Resources Code, § 21099, subd. (d)(1).) The project meets these requirements and, thus, aesthetic impacts are considered less than significant.

2. PROJECT DESIGN FEATURES

The following Project Design Features are relevant to aesthetics:

PDF A.1-1: Temporary construction fencing shall be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site.

PDF A.1-2: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

PDF A.2-1: Light sources associated with Project construction shall be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

PDF A.2-2: New structure exteriors shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat, consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

PDF A.2-3: Outdoor lighting shall be designed and installed with shielding and directed towards the interior of the Project Site so that the light source does not project directly upon any adjacent property.

PDF A.2-4: All street and pedestrian lighting shall be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing errant light spillover.

PDF A.2-5: The parking stalls and driveways of parking structures that are exposed to the sky shall be finished with either a light-colored surface material such as concrete, and/or a minimum of 80 percent of the total area of the stalls shall be shaded by vine-covered pergola, canopy, or trellis. Solar panels and their related support structures may be utilized to provide required shading.

PDF A.2-6: Non-reflective materials shall be used on the roofs of all structures constructed as part of the Proposed Project.

3. FINDINGS

CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Pub. Resources Code, § 21099, subd. (d)(1).) The project meets these requirements and, thus, aesthetic impacts are considered less than significant.

The Proposed Project will have a less than significant impact with respect to aesthetic character. No mitigation is required. The Proposed Project's impacts on views would be less than significant and no mitigation is required. Potential impacts associated with nighttime illumination and glare from reflected sunlight would be less than significant. No mitigation is required. The Proposed Project's impacts regarding shade and shadows would be less than significant. No mitigation is required. The Proposed Project would be substantially consistent with applicable guidelines or regulations related to aesthetics or visual quality. Impacts would be less than significant. No mitigation is required. The Proposed Project would have a less than significant cumulative impact on aesthetics. No mitigation is required. Incorporation of Project Design Features PDF A.1-1 and PDF A.1-2, as well as PDF A.2-1 through PDF A.2-6, will ensure that aesthetic impacts remain less than significant.

4. RATIONALE FOR FINDINGS

With regard to visual character, in accordance with Project Design Features A.1-1 and A.1-2, temporary fencing would be placed along the periphery of the Project Site to screen views of the construction activity from the ground level, and would be visually maintained through regular inspections. Furthermore, construction-related visual impacts would only occur on a short-term basis, and the Proposed Project would not substantially alter, degrade or eliminate the existing visual character of the area. Thus, construction-related visual character impacts would be less than significant. No mitigation is required.

The Proposed Project would contribute to the diversity of building heights and would not substantially change the existing character of the Project Site and surrounding area. New structures would replace aging on-site commercial structures while preserving the existing on-site historical structures, and new open space, public gathering spaces, pedestrian improvements, and landscaping would be provided. Furthermore, the Proposed Project would remove the existing fencing that surrounds the perimeter of the Project Site and would provide increased points of entry from adjacent neighborhoods, creating new and enhanced pedestrian and bicycle connections and amenities. While a substantial increase in signage is proposed at the Project Site, the amount of signage proposed is consistent with all of the applicable provisions of the Los Angeles Municipal Code (LAMC) and is part of the Proposed Project's overall design to reinvent the Project Site with a unique and unified character at a location that is adjacent to a Crenshaw/LAX Line light rail station under construction and, as a result, support the design guidelines in the Community Plan Update which calls for the creation of a "signature urban village of regional distinction that encourages pedestrian activity and economic vitality." As the Proposed Project would not substantially alter, degrade, or eliminate the existing visual character of the Project Site or surrounding area, including valued existing features or resources, or introduce elements that substantially detract from the visual character of the Project Site or surrounding area, the Proposed Project's impacts on aesthetics and visual character would be less than significant.

The Proposed Project would contribute to further infill development within a highly urbanized area of the City of Los Angeles and would not obstruct scenic vistas of valued view sources. Thus, impacts on views of the downtown Los Angeles urban skyline and the Hollywood Hills, including the Hollywood sign and the Griffith Park Observatory from the immediate vicinity of the Project Site would be less than significant. With regard to views from scenic highways, as the Proposed Project would be constructed on the west side of Crenshaw Boulevard, the Proposed Project would not affect the existing northeast views of the downtown skyline from this Scenic Principal Major Highway.

With regard to the views available from the private residential vantage points within the View Park/Baldwin Hills Estates/Windsor Hills communities, the three locations that were selected for detailed analysis in the Final EIR reflect conditions that could be experienced from a large number of locations within the overall View Park/Baldwin Hills Estates/Windsor Hills area whose viewshed includes the Project Site. However, given the multitude of viewing angles that are available within the View Park/Baldwin Hills Estates/Windsor Hills area, the potential exists that Proposed Project development may result in view obstructions from individual properties or locations that may be greater than those shown in the analysis presented in the Final EIR. While this may be the case, the Proposed Project when viewed from the perspective of the overall View Park/Baldwin Hills Estates/Windsor Hills area would not have a substantial adverse effect on views of the existing view resources that are currently available within this community (i.e., downtown Los Angeles skyline and the Santa Monica Mountains including the individual view resources of the dome of the Griffith Observatory and the Hollywood sign) with the reduction in building height for the proposed office building in the North Area of the Project Site and the proposed hotel building in the South Area of the Project Site. Thus, Project-related development would not result in a substantial obstruction to an existing view. Therefore, impacts related to view obstruction would be less than significant. No mitigation is required.

Project implementation would increase the total number of light sources at the Project Site as a result of a more dense development with more floor area being constructed compared to the existing on-site structures. Non-reflective materials would be used to minimize the impact of the interior lighting from the residential, office, and hotel uses on surrounding neighborhoods. In accordance with City regulatory requirements, exterior light sources and building materials would not cause more than 2 foot-candles of lighting intensity at the property line of the nearest

residential property or light-sensitive receptor. Furthermore, the Proposed Project is located along Crenshaw Boulevard in an urban area that already has substantial sources of nighttime lighting. Given these existing urban surrounding conditions and existing regulatory requirements, the additional light sources from the Proposed Project would not be excessive or incompatible with the surrounding land uses. The Proposed Project would also not include exterior materials that would create glare impacts, such as reflective metal or glass. Instead, non-reflective and non-glare glass would be employed. Compliance with the LAMC's reflective materials design standards, which limit reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact from window glass glare. Implementation of the Proposed Project would therefore not produce glare which would create a visual nuisance, a hazard or result in differential warming of adjacent properties. Thus, light and glare levels from the Proposed Project would not substantially alter the character of the off-site areas surrounding the Project Site. Therefore, operational light and glare impacts would be less than significant, and no mitigation measures would be required.

With regard to shade impacts, the greatest off-site shading from the Proposed Project would occur during the winter solstice. Proposed on-site buildings would shade the Baldwin Villa Plaza senior housing complex and residential uses to the west at 9:00 A.M. but would subside before 12 P.M., when the shadows would extend across the Marlton Avenue right-of-way but would not reach the senior housing property or the nearby residences. Winter shadows would partially shade the multi- and single-family housing units to the east of the Project Site across Crenshaw Boulevard between noon and 3 P.M. However, these shadows would not persist for longer than 3 hours. Thus, Proposed Project shading on sensitive uses during the winter would not occur for more than the significance threshold of 3 hours between the time frame of 9:00 A.M. and 3:00 P.M., and shading impacts during the winter would be less than significant.

During the fall and spring equinoxes, the Baldwin Villa Plaza senior housing complex would be partially shaded between 9 A.M. and noon, and the multi- and single-family residential uses to the east of the Project Site would be shaded between 3 P.M. and 5 P.M. Thus, the shade-sensitive uses would not be shaded during the spring and fall for more than the significance threshold of four hours between 9:00 A.M. and 5:00 P.M., and shading impacts during the fall and spring would be less than significant.

The Proposed Project would be consistent with the applicable policies, guidelines, and regulations related to aesthetics or visual quality as set forth in the City of Los Angeles General Plan Framework, Citywide Design Guidelines, and the West Adams-Baldwin Hills-Leimert Community Plan.

As each related project would be designed to be substantially consistent with the General Plan Framework and the West Adams–Baldwin Hills–Leimert Community Plan Urban Design policies, it is not anticipated that future development inclusive of the Proposed Project and nearby related projects would substantially alter, degrade, or eliminate the existing visual character of the Project Site or surrounding area, including valued existing features or resources, or introduce elements that substantially detract from the visual character of the area. Based on the characteristics of the nearby related projects, the Proposed Project's contribution to cumulative view impacts would not be considered cumulatively considerable. As the Project Site and surrounding area is highly urbanized, the additional artificial light sources introduced by the related projects and the Proposed Project would not significantly alter the existing medium-high to high lighting environment. Cumulative glare impacts are anticipated to be less than significant as the Proposed Project and the related projects would not utilize building materials that produce significant glare impacts. While the related projects may have significant shading impacts, the related projects in proximity to the Project Site would not have the potential to shade shadow-sensitive uses in conjunction with the Proposed Project for more than three

hours during the winter or more than four hours during the remainder of the year. Thus, Proposed Project cumulative impacts with regard to visual character, views, light and glare, and shading would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of aesthetics impacts, please see the following: (1) Section IV.A.1, Aesthetics - Visual Character/Views of the Draft EIR; (2) Section IV.A.1, Aesthetics - Light, Glare, and Shading of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

B. AIR QUALITY - PLAN CONSISTENCY AND LOCALIZED OPERATIONAL AIR QUALITY EMISSIONS AND AIR TOXICS

1. AIR QUALITY MANAGEMENT PLAN CONSISTENCY AND CONSISTENCY OF THE PROJECT WITH APPLICABLE PLANS AND POLICIES

a) DESCRIPTION OF EFFECTS

Construction and operation of the Proposed Project would not conflict with the growth projections in the South Coast Air Quality Management District's ("SCAQMD") Air Quality Management Plan ("AQMP") and would comply with applicable control measures.

Proposed Project construction would comply with SCAQMD requirements in a manner consistent with, and that meets or exceeds, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the Proposed Project would not conflict with the control strategies intended to reduce emissions from construction equipment, the Proposed Project would not conflict with or obstruct implementation of the AQMP. Further, operation of the Proposed Project would be consistent with the growth projections in the AQMP and would be supportive of relevant AQMP Transportation Control Measures aimed at reducing vehicle trips.

Proposed Project land uses, including residential, commercial, hotel, retail, office, and restaurant uses, would also be consistent with adopted regulatory policies and guidance regarding air quality. The City's General Plan defines Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. The Proposed Project implements the air quality goals and policies set forth in the City's General Plan by providing a broad array of shopping and dining choices, entertainment opportunities, and outdoor spaces and amenities, combined with new office and residential development, to enhance the Project site and surrounding area as a walkable community with options to live, play, work, and shop in an area that is already an established regional employment center. The development of the Proposed Project at the Project Site offers the opportunity to provide residential uses in the middle of a highly urbanized regional employment center and does so via the use of existing infrastructure, proximity to existing and planned regional and local transit facilities, encouragement of pedestrian activity, and location near existing and planned commercial uses that would meet many of the needs of the Proposed Project's future residents. The evaluation of consistency and rationale set forth in the Draft EIR with respect to the Original Project applies equally to the currently Proposed Project, which reflects the same variety and extent of uses.

b) PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

c) FINDING

Impacts of the Proposed Project related to consistency with the SCAQMD's AQMP and with applicable City plans and policies would be less than significant. No mitigation is required.

d) RATIONALE FOR FINDING

As discussed above and in the EIR, the Proposed Project would not conflict with or obstruct implementation of the AQMP. The City finds that impacts related to consistency with the AQMP are therefore less than significant, and no mitigation measures are required. In addition, as set forth in detail in the EIR, the Proposed Project is consistent with the applicable air quality goals, objectives, and policies in the Air Quality Element of the City's General Plan. The City finds that the proposed mix of land uses (i.e., retail, restaurant, hotel, office, and residential) within a Community Plan designated regional center in proximity to existing and planned regional and local transit facilities allows the Proposed Project to meet several of the goals and objectives of the General Plan, including those related to energy consumption, energy efficiency, air quality, and other matters, as described in more detail in the EIR. Based on this information, the City finds that air quality impacts associated with consistency with plans and policies would be less than significant. No mitigation is required.

2. LOCALIZED OPERATIONAL AIR QUALITY EMISSIONS AND AIR TOXICS

a) DESCRIPTION OF EFFECTS

The Proposed Project would generate localized emissions during Proposed Project operations as well as air toxics during both construction and operations. A localized operational air quality analysis was conducted using the methodology described in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008), as described in the EIR. The applicable screening criteria were used to determine localized operational emissions thresholds for the Proposed Project. The maximum daily localized emissions and localized significance thresholds are presented in Table IV.B-5 of the Draft EIR. As shown therein, maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for nitrogen dioxide and nitric oxide (collectively NOx), carbpn monoxide (CO), and particulate matter (PM10 and PM2.5). This analysis and conclusion also applies to the Revised Draft EIR as the changes to the Proposed Project which were analyzed in the Revised Draft EIR do not change the on-site activities which generate the emission levels presented in Table IV.B-5 of the Draft EIR. Further, as discussed in the EIR, the Proposed Project would not result in significant health effects from air toxics during either Proposed Project construction or operations. In addition, on-site receptors (e.g., employees, residents, patrons, visitors, etc.) would not be exposed to levels of toxic air contaminants that would result in a significant health risk as a result of their presence at the Project Site.

Cumulative development is not expected to expose sensitive receptors to substantial pollutant concentrations based on emissions from the Proposed Project, future ambient growth, and related projects in the Project area. Therefore, impacts of cumulative localized air emissions would be less than significant. As the SCAQMD CEQA guidance document does not require a health risk assessment for short-term construction emissions, cumulative toxic air contaminant (TAC) emission impacts during construction would be less than significant. The Proposed

Project and the related projects would likely generate minimal TAC emissions. The SCAQMD has adopted numerous rules that have resulted in and will continue to result in substantial Basin-wide TAC emission reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Proposed Project would not result in any new sources of TACs that have been identified under the California Air Resources Board's (CARB) Land Use Guidelines, and thus would not contribute to a cumulative impact.

b) PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

c) FINDING

Proposed Project impacts related to localized operational air quality emissions and air toxics would be less than significant. No mitigation is required.

d) RATIONALE FOR FINDING

Operation of the Proposed Project would not exceed SCAQMD localized significance thresholds at nearby sensitive receptors for NOx, CO, PM10, or PM2.5. Operation of the Proposed Project would not result in traffic congestion that would cause or contribute to the formation of localized CO hotspots that exceed the ambient air quality standards. Thus, operation of the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and operational impacts would be less than significant. No mitigation is required.

Construction and operation of the Proposed Project would not result in substantial emissions of toxic air contaminants at nearby sensitive receptors and thus, would not result in significant health effects from air toxics. On-site receptors (e.g., employees, residents, patrons, visitors, etc.) would also not be exposed to levels of toxic air contaminants that would result in a significant health risk. Thus, impacts associated with air toxics would be less than significant. No mitigation is required.

As cumulative development is not expected to expose sensitive receptors to substantial pollutant concentrations, cumulative localized air emissions would be less than significant. As the Proposed Project and the related projects would likely generate minimal TAC emissions, cumulative TAC emissions during construction and long-term operations would be less than significant.

3. AIR QUALITY – CONSTRUCTION: TOXIC AIR CONTAMINANTS

a) DESCRIPTION OF EFFECTS

The greatest potential for emissions of TACs during construction would be diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to a concentration of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the Proposed Project's short-term construction schedule of approximately 67 months, the Proposed Project would not result in a long-term (i.e., 70 years) source of TAC emissions. In addition, many of the Proposed Project's construction months would generally involve interior construction and renovation and not exterior construction activity that utilizes diesel equipment. Further, the SCAQMD's CEQA guidance document does not require a health risk assessment for short-term construction emissions as the SCAQMD has

determined that it is not meaningful to evaluate long-term cancer impacts from construction activities since they occur over a relatively short duration. For these reasons, construction TAC emissions would result in a less than significant impact.

Similar to the Proposed Project, the greatest potential for TAC emissions at each related project would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. As the SCAQMD CEQA guidance document does not require a health risk assessment for short-term construction emissions, as described above, cumulative TAC emission impacts during construction would be less than significant.

b) PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

c) FINDINGS

Proposed Project impacts related to the emission of toxic air contaminants during Proposed Project construction would be less than significant. No mitigation is required.

d) RATIONALE FOR FINDINGS

Impacts associated with TACs are based on an exposure to such emissions over a 70-year period. In this context, Proposed Project construction would occur for a relatively limited duration. In addition, the SCAQMD's CEQA guidance document does not require a health risk assessment for short-term construction emissions as it is not meaningful to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. For these reasons, construction TAC emissions attributable to the Proposed Project on an individual as well as cumulative basis would be less than significant.

4. REFERENCE

For a complete discussion of air quality impacts, please see Section IV.B, Air Quality, of the Draft EIR and Section III, Corrections and Additions, of the Revised Draft EIR.

C. GEOLOGY AND SOILS

1. DESCRIPTION OF EFFECTS

a) GEOLOGIC HAZARDS

Geologic hazards associated with surface fault rupture, liquefaction, landslides, and expansive soils would be less than significant given compliance with applicable building codes and seismic design standards, and implementation of proposed Project Design Features.

The Project Site is not located within a proposed State-designated Alquist-Priolo earthquake fault zone and no active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the Project Site. Thus, the potential for surface ground rupture at the Project Site is considered low. Based on current information, development of the Proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault.

The Project Site is within an area identified by the City of Los Angeles as being prone to liquefaction. Although liquefaction-induced ground settlement could occur at the Project Site, future structures built at the Project Site would be constructed in accordance with City and State Building Codes and would adhere to all modern earthquake standards, including those relating to soil characteristics. Thus, development of the Proposed Project would not expose people to significant liquefaction impacts such as seismic settlement and differential compaction.

With regard to potential impacts associated with landslides, the Project Site is relatively flat. The Project Site includes existing commercial buildings with adjacent paved parking areas, and is surrounded by urban development. In addition, per the Safety Element of the City of Los Angeles General Plan, the Project Site is not located in an area at risk for on- or off-site landslides and a review of the published Seismic Hazard Evaluation Report for the Hollywood Quadrangle indicates the Project Site does not lie within a designated Landslide Hazard Zone.

Perched groundwater was encountered at an approximate depth of 25 feet along the northern portion of the Project Site, and at deeper depths of about 59 to 60 feet in other areas of the Project Site. Therefore, the Project Site may be susceptible to shallow perched water conditions especially along the northern portion of the Project Site. If shallow perched water is encountered in shallow excavations, filter sump pumps would be placed within pits in the bottoms of the excavations as a method of construction dewatering.

Settlement and expansive soils or collapsible soils were not encountered during on-site field explorations described in the EIR.

b) SEDIMENT AND EROSION

The Project Site is located in an urbanized area and as such the proposed development would be infill development. Construction activities would be required to comply with Los Angeles Municipal Code Sections 64.70.01 and 64.72, which would ensure implementation of appropriate measures, or Best Management Practices ("BMPs"), during Proposed Project grading activities to reduce soil erosion. Following construction of proposed structures, driveways, and hardscape areas, all remaining non-paved, exposed areas would be landscaped. The installation of landscaping would serve to protect the soil and preclude potential erosion and sedimentation.

c) LANDFORM ALTERATION

The Project Site is currently completely developed with urban uses and does not contain any distinct or prominent geologic or topographic features that could be destroyed, permanently covered, or materially and adversely modified as a result of the Proposed Project. The Project Site is relatively flat. The Project Site includes the existing commercial buildings with adjacent paved parking areas, and is surrounded by urban development. No distinct or prominent geologic or topographic features are located on the Project Site such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands.

d) CUMULATIVE IMPACTS

Impacts associated with geologic and soil issues are typically confined to a Project Site or within a very localized area. Cumulative development in the area would, however, potentially increase the number of people exposed to seismic hazards. The related projects would be subject to established guidelines and regulations pertaining to seismic hazards, and any other nearby projects would be required to implement construction procedures that would avoid adverse effects at the Project Site.

2. PROJECT DESIGN FEATURES

The following Project Design Features are relevant to geology and soils:

PDF E-1: A final design-level geotechnical, geologic, and seismic hazard investigation report that complies with all applicable State and local code requirements shall be prepared for the Proposed Project by a qualified geotechnical engineer and certified engineering geologist and shall be submitted to the Los Angeles Department of Building and Safety, consistent with City of Los Angeles Building Code requirements. The site-specific geotechnical report shall be prepared to the written satisfaction of the City of Los Angeles Department of Building and Safety. The site-specific geotechnical report shall address each of the recommendations provided in the *Preliminary Geotechnical Engineering Exploration and Analysis, Baldwin Hills Crenshaw Plaza Crenshaw Boulevard and M. L. King Jr. Boulevard, Los Angeles, California*, prepared by Giles Engineering Associates, Inc., October 22, 2008, including, but not limited to the requirements set forth in Project Design Features E-2 through E-18.

PDF E-2: Clearing operations shall include the removal of all existing structural features such as building foundations and floor slabs, asphaltic concrete pavement, concrete walkways within the area of the proposed buildings, parking structures and site improvements.

PDF E-3: Existing pavement within areas of proposed development shall be removed or processed to a maximum of 3-inch size and stockpiled for use as compacted fill or stabilizing material for the new buildings and parking structures.

PDF E-4: Due to moisture sensitivity of the on-site soils, the pavement shall remain in-place, per the requirements of the final design-level geotechnical report required pursuant to PDF E-1, to protect the subgrade area from construction.

PDF E-5: Shoring shall be required for certain excavations pursuant to conditions established by the City of Los Angeles Department of Building and Safety.

PDF E-6: A mat foundation shall be utilized throughout the Project Site as permitted by the City of Los Angeles Department of Building and Safety.

PDF E-7: Heavily loaded portions of the proposed development shall be supported by straight shaft piers.

PDF E-8: Deep foundations for heavily loaded areas shall be supported by auger cast piles.

PDF E-9: Walls below-grade shall be designed to resist the applicable lateral earth pressures

PDF E-10: All walls shall be designed to support any adjacent structural surcharge loads imposed by other nearby walls or footings in addition to the above recommended active and at-rest earth pressures.

PDF E-11: Backfill behind shallow retaining walls or walls below grade shall consist of appropriate materials and shall be properly compacted.

PDF E-12: Below-grade wall backfill shall be drained to reduce the lateral earth pressures and help control wall dampness.

PDF E-13: An appropriate drainage system shall be incorporated in the wall design along the base of the wall or foundation.

PDF E-14: Portland Cement Concrete pavements shall be used in areas where traffic is concentrated such as the entrance/exit aprons as well as areas subjected to heavy loads such as the trash enclosure loading zone, the approach ramp within the truck wells of the loading docks, at sharp corners and where heavy trucks might be parked.

PDF E-15: Portland Cement Concrete pavements in high stress areas shall be at least 6 inches thick and contain No. 4 bars at 10-inch on-center spacing each way with a properly prepared subgrade.

PDF E-16: In the event that shallow perched water is encountered in shallow excavations, filter sump pumps placed within pits in the bottoms of excavations shall be used for construction dewatering.

PDF E-17: If perched water conditions are encountered during shoring operations, a dewatering system shall be installed prior to the subterranean area being excavated below the ground water level.

PDF E-18: When periods of extended rainfall are forecast (i.e., two days or more), work shall be stopped for the day or earlier, to ensure proper compaction of all fill that has been spread and awaits compaction. The construction contractor shall maintain a record of any rainfall and of discontinued of work. The daily log shall be made available to the Construction Monitor.

3. FINDINGS

Incorporation of Project Design Features PDF E-1 through PDF E-18 will ensure that geology and soils impacts remain less than significant.

4. RATIONALE FOR FINDINGS

No known active or potentially active faults underlie the Project Site, and the potential for surface ground rupture at the Project Site is therefore considered low. Development of the Proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Thus, impacts regarding surface fault rupture would be less than significant, and no mitigation measures would be necessary.

Although liquefaction-induced ground settlement could occur at the Project Site, future structures built at the Project Site would be constructed in accordance with City and State Building Codes and would adhere to all modern earthquake standards, including those relating to soil characteristics. Thus, the Proposed Project would not expose people to significant liquefaction impacts, and impacts associated with liquefaction and ground failure would be less than significant. No mitigation is required.

Landslides are not expected to pose a risk to people or structures on the Project Site. As such, impacts associated with landslides or other forms of natural slope instability would be less than significant, and no mitigation is required.

Settlement and expansive soils or collapsible soils were not encountered during on-site field explorations. With adherence to the City's standards, and compliance with building code provisions, potential impacts regarding expansive soils would be less than significant. No mitigation is required.

Implementation of the Proposed Project would not result in substantial erosion or sedimentation given compliance with applicable regulations. The Proposed Project would be an infill development. BMPs would be implemented during Proposed Project grading activities to reduce soil erosion. Following construction of proposed structures, driveways, and hardscape areas, all remaining non-paved, exposed areas would be landscaped, which would serve to protect the soil and preclude potential erosion and sedimentation. Therefore, given compliance with applicable regulations during construction and operation, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation is required.

The Project Site is currently completely developed with urban uses and does not contain any distinct or prominent geologic or topographic features that could be destroyed, permanently covered, or materially and adversely modified as a result of the Proposed Project. No distinct or prominent geologic or topographic features are located on the Project Site such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Therefore, no impact from landslides or other forms of natural slope instability, or landform alteration would occur on the Project Site. No mitigation is required.

Impacts associated with geologic and soil issues are typically confined to a Project Site or within a very localized area. In addition, related projects would be subject to established guidelines and regulations pertaining to seismic hazards, and any other nearby projects would be required to implement construction procedures that would avoid adverse effects at the Project Site. As such, adherence to applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of geology and soils impacts, please see Section IV.E, Geology and Soils, of the Draft EIR, and Section III, Corrections and Additions, of the Revised Draft EIR.

D. GREENHOUSE GAS EMISSIONS

1. DESCRIPTION OF EFFECTS

a) EMISSIONS

Construction and operation of the Proposed Project would generate greenhouse gas (GHG) emissions. Detailed calculations were performed in accordance with SCAQMD and CARB guidance and were included in the EIR as summarized in Section IV.C., Greenhouse Gas Emissions, of the Draft EIR and Section III, Corrections and Additions of the Revised Draft EIR. As shown therein, the Proposed Project would achieve an 18 percent reduction from "business-as-usual" – the standard for measurement articulated by CARB to determine if a project can be consistent with AB 21 and therefore not have a significant impact. With the achievement of an 18 percent total reduction from "business-as-usual," the Project's climate change impacts with regard to GHG emissions would be less than significant. That reduction is attributable to the principles of smart growth and sustainability evidenced in the Proposed Project's mixed-use nature, the Project Site's accessibility to transit and the availability of existing infrastructure to service the Proposed Project uses. The project is consistent with CARB's Climate Change Scoping Plan for the implementation of AB 32, Executive Orders S-3-05 and B-30-15; SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Code. However, it should be noted that the Proposed Project would result in an increase of approximately 35,092 metric tons of CO2e in comparison to that generated by the future No Project condition.

b) CONSISTENCY WITH GHG REDUCTION PLANS

Construction and operation of the Proposed Project would not conflict with applicable GHG emissions reductions plans, policies, or regulations. The project is consistent with CARB's Climate Change Scoping Plan for the implementation of AB 32, Executive Orders S-3-05 and B-30-15; SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Code. The Proposed Project is consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The location and design of the Proposed Project reflect and support these core objectives. In addition, as recommended by CARB's Climate Change Scoping Plan, the Proposed Project would use "green building" features as a framework for achieving emissions reductions.

The Proposed Project also would comply with the City of Los Angeles Green Building Ordinance. This program emphasizes improving energy conservation, energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Proposed Project's design features would advance these objectives.

c) CUMULATIVE IMPACTS

CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs from even relatively small (on a global basis) increases in GHG emissions. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and therefore significant. A cumulatively considerable impact is the impact of a proposed project in addition to the related projects. However, in the case of global climate change, the proximity of a project to other GHG-generating activities is not directly relevant to the determination of a cumulative impact. Although the State requires Metropolitan Planning Organizations and other planning agencies to consider how region-wide planning decisions can impact global climate change, there is currently no established non-speculative method to assess the cumulative impact of proposed independent private- party development projects.

The Proposed Project would be consistent with applicable GHG reduction strategies recommended by the City and State. In addition, the Proposed Project would support and be consistent with relevant and applicable GHG emission reduction strategies as set forth in SCAG's Sustainable Communities Strategy. These strategies include providing residences, and a range of shopping, entertainment and services in an urban infill location and within a relatively short distance of existing and proposed transit stops; providing employment near current and proposed transit stops; and supporting alternative and electric vehicles via the installation of on-site electric vehicle charging stations. Given the Proposed Project's consistency with State and City of Los Angeles GHG emission reduction goals and objectives, Executive Orders S 3 05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance, the Proposed Project's contribution to the cumulative impact of global climate change would be less than significant and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

2. PROJECT DESIGN FEATURES

The Proposed Project is based on principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the Project Site's accessibility to public transit, and the

availability of existing infrastructure to serve the proposed uses. Implementation of these sustainability features serves to reduce the Proposed Project's air quality emissions via a reduction in vehicle trips, vehicle miles traveled, embodied energy associated with water usage, etc. These, as well as a number of other project design features set forth in Section II, Project Description, of the Revised Draft EIR, would also serve to reduce the air emissions generated by the Proposed Project, which in turn would reduce GHG emissions. In addition, the air quality mitigation measures set forth in Section IV.B, Air Quality, of the Draft EIR would result in further substantive reductions in the Proposed Project's GHG emissions. As GHG emissions are generated from a wide array of sources, implementation of the Proposed Project's water conservation and transportation demand management features as set forth in Section IV.M.2, Utilities—Water Supply, and Section IV.L, Transportation and Circulation, of the Draft EIR, respectively, would also reduce the Proposed Project's GHG emissions.

3. FINDINGS

Impacts associated with greenhouse gas emissions would be less than significant. No mitigation is required.

4. RATIONALE FOR FINDINGS

Construction and operation of the Proposed Project would achieve an 18 percent reduction from "business-as-usual." In addition, the Proposed Project contains numerous Project Design Features that would reduce the Proposed Project's emissions profile and would represent improvements above what can be considered "business as usual." The Proposed Project's GHG emissions reduction of 18 percent compared to the "business as usual" scenarios constitutes a larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020).

Therefore, the Project would not have a significant impact on the environment due to its GHG emissions. No mitigation is required.

Construction and operation of the Proposed Project would also not conflict with applicable GHG emissions reductions plans, policies, or regulations. The proposed Project would be consistent with the goals set forth in AB 32, as well as in CARB's Climate Change Scoping Plan. Implementation of the Proposed Project would incorporate water conservation, energy conservation, tree- planting, and other features consistent with the City's Green Building Code and applicable greenhouse gas reduction strategies. Thus, construction and operation of the Proposed Project would not have a significant impact with respect to consistency with GHG reduction plans and impacts would be less than significant. No mitigation is required.

With regard to cumulative impacts, the Proposed Project would be consistent with applicable GHG reduction strategies recommended by the City and State. The Proposed Project would be consistent with the State's goals and result in a GHG emissions profile that constitutes a larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020).

Given that the Proposed Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the City finds that the Proposed Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of aesthetics impacts, please see Section IV.C., Greenhouse Gas Emissions, of the Draft EIR, and Section III, Corrections and Additions, of the Revised Draft EIR.

E. HAZARDS AND HAZARDOUS MATERIALS

1. DESCRIPTION OF EFFECTS

a) ROUTINE TRANSPORT, USE OR DISPOSAL OF HAZARDOUS MATERIALS

Construction of the Proposed Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils.

Operation of the Proposed Project's residential, hotel, office, retail, and restaurant uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance.

b) ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS

The Proposed Project would involve the demolition and removal of Outbuildings A, C, and E through K, parking areas, and landscaping. Certain structures at the Project Site are known to contain Asbestos-Containing Materials (ACMs), including the building occupied by Walmart at 4101 Crenshaw Boulevard. Based upon the age of the Macy's and Walmart buildings, it is possible that several painted building surfaces on these buildings—primarily exterior building surfaces—contain lead-based paint (LBP). Those buildings will not be demolished as part of the Proposed Project. Based upon the dates of construction (1988–2011) of the remaining buildings located at the Project Site (mall outbuildings, movie theater and grocery store), it is unlikely that their painted surfaces contain lead-based paint. According to the Phase I Environmental Site Assessment (ESA), it is possible, though not likely, that polychlorinated biphenyls (PCBs) may exist at the Project Site. As part of the proposed grading and excavation activities it is also possible for the Proposed Project to encounter contaminated soils during construction activities. Should contaminated soils be encountered during Proposed Project construction, the Project Applicant would implement a Soil Management Plan (SMP) to the satisfaction of the Regional Water Quality Control Board, which would ensure the remediation of contaminated soils, if encountered.

c) LOCATION OF THE PROJECT SITE ON A REGULATORY LIST OF HAZARDOUS MATERIALS SITES

A search of the 2005 Resource Conservation and Recovery Act (RCRA) facilities database identified 15 small quantity generator sites, including the Project Site, and one large quantity generator site within the Project Site's 0.25-mile database search range. The on-site facility located on the list was a dry cleaning facility which was removed from the Project Site in 2003. It is unlikely that the off-site locations have contaminated the Project Site due to their distance from the Project Site, groundwater flow direction (which is likely to the north, based on topographic gradient), and since identification on this list does not indicate that a site has impacted the environment. The Project Site is also listed on the State's Underground Storage Tanks (USTs) database. The two USTs on the Project Site that are listed were removed from the Project Site prior to its redevelopment as the Baldwin Hills Crenshaw Plaza and, based on

subsurface investigations, require no further investigation. In addition, the Project Site has several tenant spaces listed on the Hazardous Waste Information System Database (HAZNET). Inclusion on this list identifies a site as a likely generator of hazardous waste. However, identification on this list does not indicate that a site has impacted the environment. Further, inspection of the tenant spaces at the Project Site identified in the HAZNET database did not reveal improper chemical use or storage.

c) PROXIMITY TO SCHOOLS

One school, Marlton School, is located within one quarter mile of the Project Site. Any hazardous materials that may occur on the Project Site would be properly removed and disposed of during the construction phase in accordance with all applicable federal, state, and local laws and regulations which govern the identification, handling, removal, transport, and disposal of such materials. Operation of the Proposed Project would involve the use of minimal amounts of hazardous materials for routine cleaning typical of residential, commercial, hotel, retail, and restaurant land uses.

d) CUMULATIVE IMPACTS

Development of the Proposed Project, in combination with the 39 related projects has the potential to increase the use, storage, transport, and/or accidental release of hazardous materials during construction and operation. Since hazardous materials and risk of upset conditions are largely site-specific, each related project would undergo an evaluation for potential threats to public safety, including those associated with routine transport, use, or disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials into the environment; and hazardous materials site listing. Further, the related projects would require compliance with federal, State, and local laws regarding hazardous materials and other hazards.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

The Proposed Project will have a less than significant impact with respect to the routine transport, use or disposal of hazardous materials, the accidental release of hazardous materials, and the location of the Project Site on a regulatory list of hazardous materials sites. No mitigation is required.

4. RATIONALE FOR FINDINGS

Any risk associated with the routine transport, use, and disposal of hazardous materials during Proposed Project construction and operations would be adequately managed through compliance with applicable regulatory standards and regulations. Therefore, the potential impact associated with the routine transport, use, and disposal of hazardous materials during Proposed Project construction and operation would be less than significant. No mitigation is required.

When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal is limited. In accordance with the EPA's National Emission Standard for Hazardous Air Pollution regulation and SCAQMD's Rule 1403, all materials which are identified as ACMs and may be disturbed by construction activities would be removed by a trained and licensed asbestos abatement contractor under the surveillance of a certified third-

party consultant. In addition, all on-site construction workers that would be working with coated or glazed building components or potential on-site PCBs would need to be knowledgeable about LBP and PCB removal and abatement. Therefore, while construction workers and the general public could be exposed to hazardous materials during demolition activities, which would involve the disposal of materials potentially containing ACMs, and possibly PCBs and LBP, Proposed Project construction would occur in accordance with established regulatory compliance measures which would address these potentially significant impacts and reduce any potential impacts to a less than significant level. In addition, with implementation of the SMP, contaminated soils, if present and exported from the Project Site, would not result in a significant hazard to construction workers and the general public, or the environment and this impact would be considered less than significant. No mitigation is required.

As discussed above, construction of the Proposed Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site. As such, impacts would be less than significant and no mitigation is required.

Operation of the residential, hotel, commercial, retail, and restaurant uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, neither construction nor operation of the Proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As such, impacts would be less than significant and no mitigation is required.

As the Proposed Project would be constructed and operated in compliance with federal, State, and local laws pertaining to hazards and hazardous materials and would not result in a significant hazardous materials impact that would be cumulatively considerable, cumulative impacts would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of hazards and hazardous materials impacts, please see Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, and Section III, Corrections and Additions, of the Revised Draft EIR.

F. HYDROLOGY AND SURFACE WATER QUALITY

1. DESCRIPTION OF EFFECTS

a) WATER QUALITY STANDARDS AND WASTE DISCHARGE REQUIREMENTS

Temporary construction activities would entail the demolition of existing structures, the removal of existing paved areas and landscaping, site grading and excavation, and building construction. Throughout these activities, on-site soil could be exposed to water- and wind-borne erosion, which could increase siltation in stormwater flows leaving the Project Site. Similarly, operation of construction vehicles and equipment could also introduce pollutants to on-site soils or other surfaces that could be conveyed off-site by stormwater flows during rain events. In addition, given the new uses and improvements proposed as part of the

Proposed Project, long-term operational water quality impacts could occur. With compliance with existing regulatory requirements, Proposed Project impacts would be reduced to a less than significant level.

b) GROUNDWATER SUPPLY

The Los Angeles Department of Water and Power ("LADWP") is the water purveyor for the City. Water is supplied to the City from three primary sources, one of which is groundwater. Groundwater levels in the City of Los Angeles are maintained through an active process via spreading grounds and recharge basins. Although open spaces throughout the City do allow for seepage of water into smaller unconfined aquifers, the larger groundwater sources within the City of Los Angeles are actively recharged and contribute to supplying the City with its water supply. Since the Project Site has been previously developed and currently contains 13 buildings and adjacent hardscape/paved parking areas, the Project Site does not currently provide an opportunity for the recharge of groundwater. As the Proposed Project's design would not result in a substantive change in the amount of on-site impervious surfaces, existing conditions regarding the lack of groundwater recharge would also occur under the Proposed Project. In addition, similar to existing conditions at the Project Site, the Project Site is not a source of groundwater pumping for potable water usage as no groundwater extraction wells are located on-site. Furthermore, the Proposed Project includes over 138,000 square feet of landscaped areas. Thus, except for potential dewatering activities necessary for Proposed Project construction, groundwater supplies would not be substantially altered from existing conditions.

c) DRAINAGE AND SURFACE WATER RUNOFF

During storm events, all stormwater that comes in contact with the Project Site runs off from the Project Site and discharges to landscaped areas or to the local storm drain system. The storm drain system then conveys the surface water runoff to the City of Los Angeles storm drain infrastructure which conveys surface water flows to the Los Angeles River Flood Control Channel and ultimately the Pacific Ocean. As required by the City's Low Impact Development (LID) Ordinance, the Proposed Project would implement a project- specific water quality management plan (WQMP) that would retain stormwater flows from a 0.75-inch storm event on-site, or the 85th percentile storm event, whichever is larger, as well as treat on-site stormwater prior to discharge to the City's storm drain system. Under the Proposed Project, stormwater flows generated on-site would be conveyed through the on-site collection, conveyance, and treatment BMPs before entering the existing storm drains which serve the Project Site.

While the Proposed Project is under construction, the rate and amount of surface runoff generated at the Project Site would fluctuate to a limited extent. Stormwater runoff following the completion of Proposed Project construction, during both 25-year and 50-year storm events, would be reduced relative to existing conditions with the development of the Proposed Project. Further, the Proposed Project would implement site drainage features pursuant to the City's LID Ordinance, which provides for storm water retention to preclude flooding.

d) INUNDATION BY SEICHE, TSUNAMI, OR INUNDATION

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of the sea floor associated with large, shallow earthquakes. The Project Site is located approximately 7.5 miles inland from the Pacific Ocean and is not located in a coastal area. Therefore, tsunamis are not considered to be a significant hazard at the Project Site. Further, per the Safety Element of the City of Los Angeles

General Plan, the Project Site does not lie within areas of the City that have been identified to be potentially impacted by tsunamis.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. Per the Safety Element of the City of Los Angeles General Plan, the Project Site is identified as being located within the potential inundation area associated with the Silver Lake Reservoir, which is located over 6 miles north from the Project Site. Due to the fact that the area between the Silver Lake Reservoir and the Project Site is heavily developed with urban infrastructure and separated by several miles of roadways, gutters and stormdrains that direct water flows toward the Los Angeles River Channel and away from the Project Site, flooding, mudflows, or inundation associated with the failure of a levee or dam is considered remote.

e) CUMULATIVE IMPACTS

Each of the related projects, individually and cumulatively, could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff reaching the City's storm drain system, resulting in cumulative impacts to hydrology and surface water quality. However, as with the Proposed Project, each of the related projects would also be subject to State NPDES and City Permit requirements for both construction and operation. Thus, cumulative impacts to hydrology and surface water quality would be less than significant.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

The Proposed Project will have a less than significant impact with respect to water quality standards, waste discharge requirements, groundwater supply, drainage and surface water runoff, as well as inundation by a tsunami, seiche, or reservoir failure. No mitigation is required.

4. RATIONALE FOR FINDINGS

Proposed Project construction would be required to comply with the conditions of the City's General Construction Permit, issued by the Los Angeles Regional Water Quality Control Board ("RWQCB"), which requires the preparation and implementation of a site-specific Stormwater Pollution Prevention Plan ("SWPPP") for construction activities. The SWPPP requires that all potential on-site stormwater pollution sources are addressed through the implementation of applicable stormwater quality Best Management Practices ("BMPs"), including BMPs to minimize erosion and sedimentation and the generation and transport of other construction-related pollutants. As such, with implementation of an approved site-specific SWPPP, short-term construction activities would not result in a violation of water quality standards or waste discharge requirements and impacts would be less than significant. No mitigation is required.

Per LID requirements for water quality, the Proposed Project would be required to implement a project-specific WQMP that includes a variety of BMPs, including site design, source control, and treatment control BMPs that would reduce the generation, release, and transport of water pollutants in stormwater flows leaving the Project Site. The WQMP, subject to review and approval by the City of Los Angeles Department of Public Works, would ensure that the Proposed Project would not violate any water quality standards or

waste discharge requirements and impacts would be less than significant. No mitigation is required.

With regard to groundwater supply, the extent of impervious surfaces under existing conditions and with development of the Proposed Project limits the Project Site's potential to substantially contribute to the recharge of groundwater sources in the area. In addition, Proposed Project construction may require groundwater dewatering. In the event that groundwater dewatering is required, impacts with regard to groundwater extraction would be minimal and would not affect long- term water table conditions. Therefore, the Proposed Project would not substantially deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Impacts would be less than significant and no mitigation is required.

Given implementation of a project-specific WQMP, the Proposed Project would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant and no mitigation is required. Further, because the construction period is temporary and an on-site storm drain system would be constructed in conjunction with the development, the potential for flooding during construction would be less than significant. No mitigation is required.

Following the completion of Proposed Project construction, the runoff flow rate across the Project Site would be reduced, and as such, the Proposed Project would not require upgrades to any off-site storm drains. Additionally, because the existing and proposed on-site storm drain system and existing off-site storm drain system could accommodate post-Project flows, no on- or off-site flooding following the completion of Proposed Project construction would occur. Therefore, Proposed Project operational impacts related to stormwater drainage and on- and off-site flooding would be less than significant. No mitigation is required.

The Proposed Project would comply with the City's LID Ordinance, which requires the implementation and maintenance of project-specific BMPs that not only retain stormwater flows from a 0.75-inch storm event (or 85th percentile storm event, whichever is larger) on-site, but would also serve to capture and treat all stormwater prior to discharge to the public storm drain system. As such, given the adequacy of existing stormwater drainage infrastructure in the area and implementation of site-specific BMPs for water quality, the Proposed Project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant. No mitigation is required.

Due to the Project Site's distance from the Pacific Ocean and information presented in the City's General Plan Safety Element, impacts from tsunamis at the Project Site would be less than significant. Since the area between the Silver Lake Reservoir and the Project Site is heavily developed with urban infrastructure and separated by several miles of roadways, gutters and storm drains that direct water flows toward the Los Angeles River Channel and away from the Project Site, flooding, mudflows, or inundation associated with the failure of a levee or dam is considered remote and therefore is less than significant. Further, due to the location and design of the Proposed Project, risks associated with inundation would be considered remote and impacts would be less than significant. No mitigation is required.

Each of the related projects, as with the Proposed Project, would be subject to State NPDES and City Permit requirements for both construction and operation. Each qualifying project would be required to develop SWPPPs and Standard Urban Stormwater Mitigation Plans (SUSMPs) and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface water quality. In addition, the LADPW reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is

available. Thus, cumulative impacts to hydrology and surface water quality would be less than significant.

5. REFERENCE

For a complete discussion of hydrology and surface water quality impacts, please see Section IV.G, Hydrology and Surface Water Quality, of the Draft EIR, and Section III, Corrections and Additions, of the Revised Draft EIR.

G. LAND USE AND PLANNING

1. DESCRIPTION OF EFFECTS

a) CONSISTENCY WITH APPLICABLE PLANS AND POLICIES

The Proposed Project would be consistent with adopted regulatory policies and guidance governing the relationship between land uses in the Project vicinity. Specifically, as detailed further in the EIR, the Proposed Project is consistent with the following applicable regulations, plans and policies.

(1) City of Los Angeles General Plan Framework Element

The Proposed Project would be consistent with the objectives of the Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, and Transportation Chapters of the General Plan Framework Element. Specifically, the Proposed Project is identified as a Regional Center on the Framework's Long-Range Land Use Diagram (South Los Angeles) and would serve the needs of existing and possible future residents and as well as expanding the diversity of uses within this Regional Center. As defined in the Framework Land Use Element, Regional Centers are expected to contain a diversity of uses and to serve as the focal points of regional commerce, identity, and activity. The Proposed Project includes a mix of retail, hotel, residential, office and other commercial uses that will allow the Project Site to serve as point of commerce and activity consistent with that designation. The Proposed Project would increase the vitality in the area through the provision of 821,715 square feet of net new commercial retail, entertainment, office, and hotel uses that would provide numerous job opportunities and support visitors. The Proposed Project also introduces residential uses to the Project Site, increasing housing opportunities. The concentration of development would support the area's existing range of services and commercial activities and would be consistent with the Regional Center designation. The development of the Proposed Project within a Regional Center as well as within a primary transit corridor served by the future Metro Crenshaw/LAX Line station (under construction) and by existing Metro bus service of more than 30 bus lines, DASH service, and nearby freeways supports the Framework Element's policies to encourage retail, residential, commercial, office, and hotel uses along primary transit corridors. In addition, the Proposed Project would provide streetscape improvements and pedestrian amenities including enhanced pedestrian circulation paths, outdoor seating, gathering spaces, thematic elements, landscaping, street trees, pedestrian lights, common open areas, and marked street crossings along pedestrian routes that would enhance pedestrian activity.

(2) West Adams–Baldwin Hills–Leimert Community Plan

The Community Plan currently designates the vast majority of the Project Site for Regional Center Commercial land uses. The Project Applicant is proposing to redevelop the Baldwin Hills Crenshaw Plaza to include a mixed-use retail, commercial, office, hotel, and residential project totaling up to approximately 3,072,956 square feet, conforming to the allowable floor area ratio

(FAR) established for the Commercial Regional land use designation of the Community Plan. However, Regional Center uses are limited to Height District 1 by Footnote 1 to the Community Plan Land Use Map. Height District 1 establishes a maximum FAR of 1.5:1. As such, to develop the Project as proposed, a General Plan Amendment (GPA) is required. The requested GPA is to add Height District 2 to the Land Use Map legend and apply this footnote to the Project Site. Thus, with the approval of the requested GPA, the Proposed Project would be consistent with the Community Plan land use designation for the Project Site. Implementation of the requested GPA would support the intent of the Community Plan with regard to the amount of development and range of land uses for development sites that serve regional commercial needs. In addition, all other regional centers in the City are designated Height District 2. In addition, the Proposed Project would implement a number of Community Plan policies, thereby assisting the City in meeting many of the Community Plan's goals and objectives. Particularly important policies that the Proposed Project would implement include those addressing residential, commercial, open space and recreation, police protection, fire protection, schools/education, libraries, transportation, historic and cultural amenities, and urban design policies.

(3) Redevelopment Plan for the Crenshaw Redevelopment Project

The Project Site is located within the boundaries of the Redevelopment Plan. The Proposed Project would conform to the planning objectives identified in the Redevelopment Plan by creating high-density mixed-use hotel, office, residential, and retail opportunities. With respect to the land use and development requirements of the Redevelopment Plan, the land uses proposed under the Proposed Project would conform to the allowable uses identified in Section 402 of the Redevelopment Plan under the Regional Center land use designation. Furthermore, the Proposed Project would comply with the Redevelopment Plan requirement under Section 410, which limits the number of buildings in the Project Site area to 350 and to a maximum of 1,600 dwelling units. In addition, the Proposed Project would be consistent with the limitations on type, size, height of buildings, which in accordance with Exhibit C of the Redevelopment Plan, limits building intensities within the Plan Area to not exceed three times the buildable area of the Project area, which applies in aggregate across the entire Project Site.

(4) City of Los Angeles Municipal Code

In accordance with Section 12.14 of the LAMC, all of the land uses that are proposed under the Proposed Project are permitted by right in the C2 zone and the Proposed Project would be consistent with the setback requirements set forth in the LAMC. Pursuant to the current "D" Development Limitation, the Project Site has an allowable FAR of 3:1 for each building or structure, but the total floor area of the entire Project Site shall not exceed a FAR of 1.5:1. The Project Site consists of 24 parcels totaling 1,839,884 square feet of land area and, thus, allows 2,759,826 square feet of building area. However, under the Redevelopment Plan, the Project Site has an allowable FAR of 3:1, which allows 5,519,653 square feet of building area. The Proposed Project exceeds the allowable FAR under the LAMC "D" Development Limitation by approximately 313,130 square feet, or by 11 percent, but is 2,446,697 square feet less than the total floor area permitted under the Redevelopment Plan. As such, the Project Applicant is seeking a zone change to amend the "D" Development Limitation on all parcels within the Project area, in order to make it consistent with the floor area permitted for the Project Site by the Redevelopment Plan. For entitlement purposes, and to provide consistency between the Project Site's zoning and the Redevelopment Plan, the Project Applicant is also including a request for approval of a CUP for a unified development with the floor area to be averaged across the Project Site. As such, with approval of a zone change to amend the "D" Development Limitation, the allowable floor area for the Project would be 5,519,653 square feet,

and with the approval of the CUP for floor area averaging, the Proposed Project would be consistent with LAMC zoning requirements, and with the provisions of the Redevelopment Plan. In addition, the Proposed Project would accommodate the minimum required amount of open space required on-site pursuant to LAMC Section 12.21(G); provide parking in accordance with LAMC and Advisory Agency Parking Policy requirements subject to the granting of the Project Applicant's request to reduce parking as appropriate for transit-proximate uses; and proposed signage would also comply with the City's sign regulations. In addition, the Project Applicant is requesting to amend the existing "Q" condition that applies to the Project Site, which requires parking for commercial and office uses to be provided at a rate of 3 spaces per 1,000 square feet within a small area at the northwest corner of the Project Site to instead require parking to be provided at a rate of 2 spaces per 1,000 square feet, consistent with the parking requirements applicable to the majority of the Project Site.

(5) Walkability Checklist

The City of Los Angeles Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote a high-quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Proposed Project is substantially consistent with the walkability guidelines by providing pedestrian amenities along the perimeter of the Project Site as well as pedestrian connections internal to the Project Site; providing landscaping to buffer the sidewalks that run parallel to the Project Site and from the entrances to the parking garage; providing street furnishings including interior and perimeter landscaping, street canopies, pedestrian corridors, open spaces, street furniture, and decorative elements; situating pedestrian entrances to the buildings at grade level; and concentrating new development adjacent to the future Metro Crenshaw Line as well as within immediate walking distance of 13 bus routes/lines, including eight Metro lines and three DASH routes, thus, providing substantial access to mass transit.

(6) Southern California Association of Governments 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (2012-2035 RTP/SCS) and Southern California Compass Blueprint Growth Vision (Compass Growth Vision)

The Proposed Project would be consistent with the goals set forth in the 2012–2035 RTP/SCS. Specifically, the Proposed Project would focus new residential and commercial development within an area that is designated as a high quality transit area (HQTA) and is well-served by public transit (see description above). With regard to the Compass Growth Vision, the Proposed Project would reduce vehicle trips, vehicle miles travelled (VMT), greenhouse gas, and related emissions by developing, revitalizing, and expanding a mixed-use commercial project, with retail stores and restaurants, offices, a hotel, and other entertainment uses on a site with 961 multi-family dwelling units, near existing and proposed transit service, while also creating a mobility hub on the Project Site and supporting transit improvements. Therefore, the Proposed Project would be consistent with the Compass Growth Vision.

b) CUMULATIVE IMPACTS

As the Proposed Project would not result in significant land use impacts and would implement important local and regional planning goals and policies for the Crenshaw community, no significant cumulative land use impacts from future development would occur.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

Project impacts associated with land use would be less than significant. No mitigation is required.

4. RATIONALE FOR FINDINGS

The Proposed Project combines retention of the existing Baldwin Hills Crenshaw Plaza enclosed mall and selected Outbuildings with a mixed-use master plan that enhances the restaurant and retail offerings on the Project Site while introducing a hotel use, office use, and apartment and condominium apartment uses in an infill location that fulfills the City's General Plan Framework vision for Regional Centers in a location that is situated on a new rail transit corridor and a mature existing bus transit corridor. The Proposed Project will introduce new jobs and a housing population that will occupy up to 961 new high quality residences to the Project Site, and will do so in a manner that demonstrates the land use policies set forth in City's General Plan Framework Element, the West Adams - Baldwin Hills - Leimert Community Plan, the Redevelopment Plan for the Crenshaw Redevelopment Project, the City Planning Department's Walkability Checklist, and the SCAG's Regional Transportation Plan/Sustainable Communities Strategy and Southern California Compass Blueprint Growth Vision. In addition to the array of uses that will revitalize the Project Site, benefits to the community associated with the Proposed Project include enhanced open space, improved pedestrian access to and within the Project Site, a cohesive and well-articulated architectural and landscape vision, a mobility hub that connects the Project Site with the wealth of surrounding transit options including safe and integrated access to the Crenshaw/LAX Line light rail station, and activation of the pedestrian interface with existing commercial and residential uses in the Project vicinity. The City finds that the Proposed Project maintains and improves continuity within the Project Site and between the Project Site and surrounding properties and land uses.

In addition, the City finds that the GPA and zone change to amend the Project Site's "D" limitation would create consistency between the allowable FAR for the Project Site and the FAR set forth in the Crenshaw Redevelopment Plan as well as being consistent with the allowable FAR within Regional Centers throughout the City. The City also finds that the Proposed Project's parking plan would establish a comprehensive and integrated parking supply for the Project Site that would meet the needs of all existing and proposed land uses, particularly given the availability of public transit adjacent and in proximity to the Project Site (light rail and buses) and as such, would support the following additional requested actions: (1) zone change to amend the Project Site's "Q" condition, (2) conditional use permit to permit a parking reduction for transit-proximate uses, and (3) Zoning Administrator's Determination to permit shared parking. The City also finds that the Proposed Project represents an integrated and unified mixed-use development whose implementation would be facilitated by the conditional use permit to permit floor area averaging.

With the approval of the requested actions, the City finds that the Proposed Project is consistent with the applicable regulations, plans and policies of the City's General Plan Framework, the Redevelopment Plan for the Crenshaw Redevelopment Project, the West Adams–Baldwin Hills–Leimert Community Plan, the LAMC, the SCAG 2012 - 2035 Regional Transportation Plan/Sustainable Communities Strategy and Compass Blue Print Growth Vision, and the AQMP. Thus, impacts would be less than significant, and no mitigation is required.

With regard to cumulative impacts, the types of land uses associated with the related projects are consistent with the existing land use pattern in the area and are not expected to result in any cumulative changes in land use patterns. Further, these related projects would be reviewed by that City and are expected to be consistent with the City's General Plan and zoning regulations. Therefore, land use impacts associated with these projects would not cumulatively affect land use patterns in the project area. Cumulative land use impacts would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of land use and planning impacts including side-by-side analysis of Project consistency with the applicable policies of the General Plan Framework Land Use Element, Community Plan, Redevelopment Plan and Walkability Checklist, please see Section IV.H., Land Use and Planning, of the Draft EIR; and Section III, Corrections and Additions, of the Revised Draft EIR.

H. NOISE – CONSTRUCTION: GROUND-BORNE VIBRATION; AND OPERATION: ON-SITE STATIONARY NOISE, OFF-SITE ROADWAY NOISE, GROUND-BORNE VIBRATION, AND SITE COMPATIBILITY (PROPOSED RESIDENTIAL USES)

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION: GROUND-BORNE VIBRATION

The use of heavy construction equipment (e.g., a large bulldozer) would generate vibration levels of 0.089 inch per second at a distance of 25 feet. Proposed Project construction activity would not include pile driving. A field survey of the Project area identified those off-site noise sensitive uses that could be affected by Proposed Project construction. The Draft EIR utilized a set of sensitive receptor sites located near but off site. The nearest off-site sensitive land use to the Project Site would be the Baldwin Villa Plaza development located approximately 80 feet west of the Project Site. Occasional heavy equipment activity could result in vibration levels of 0.02 inch per second at this closest sensitive receptor. Vibration levels at this receptor and other receptors located further from the Project Site would not exceed the FTA potential building damage threshold of 0.2 inch per second. As such, impacts would be less than significant.

A construction vibration annoyance impact would result if sensitive receptors would be exposed to vibration levels of 72 root mean square velocity in in decibels (VdB RMS) or greater. Typical heavy equipment (e.g., a large bulldozer) generates vibration levels of 87 VdB RMS at a distance of 25 feet. At the Baldwin Villa Plaza development, the nearest off-site sensitive receptor, typical construction equipment would generate vibration levels of approximately 71.8 VdB RMS. This vibration level would not exceed the Federal Transit Administration (FTA) annoyance threshold of 72 VdB RMS. As such, impacts would be less than significant.

b) OPERATION: ON-SITE STATIONARY NOISE

Proposed Project operations would generate noise from the following on-site sources: (1) parking areas, (2) mechanical equipment, and (3) outdoor entertainment areas.

Proposed Project parking includes a mix of subterranean and above-ground parking structures. Subterranean parking activity would not generate audible noise levels at any off-site sensitive receptor. The nearest above-ground parking structure to an off-site sensitive receptor would be located on the north side of the Project Site, beneath the residential uses. This location is

approximately 110 feet from the nearest sensitive receptor, the Baldwin Villa Plaza. Proposed Project parking activity would generate a maximum noise level increase of 0.3 decibel equivalent energy noise level (dBA L_{eq}) at this nearest off-site sensitive receptor. Thus, Proposed Project parking activity would not increase ambient noise levels by more than the 5 dBA significance threshold established by the City of Los Angeles.

Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 60 dBA L_{eq} at 50 feet. Proposed Project mechanical equipment would be screened from view, as necessary. The highest ambient noise increase due to Proposed Project mechanical equipment noise would occur at the single- and multi-family residences located northwest of the Project Site. The operation of Proposed Project mechanical equipment would not increase ambient noise levels by 5 dBA or more at these or any other off-site noise sensitive use.

The Proposed Project may include an open-air entertainment area within the southeast portion of the Project Site. A detailed analysis was completed to ascertain if entertainment activity would increase noise levels at sensitive receptors. This entertainment area would not have a direct line-of-site to any off-site noise sensitive receptors. It is assumed that amplified sound would be 15 dBA above the future ambient noise level at 25 feet. In addition, both on-site and off-site buildings would act as barriers further reducing potential noise levels from this particular source by 5 to 15 dBA or more. Further, amplification equipment would be positioned away from those receptors to have a substantial effect on reducing noise levels. These factors taken collectively would limit potential increases in noise levels at all off-site sensitive receptors to less than 5 dBA over existing ambient noise levels.

c) OPERATION – OFF-SITE ROADWAY NOISE

Mobile source noise levels have been calculated along the roadway segments near the Project Site. The roadway segments selected for analysis are those that are expected to be most directly impacted by Project-related traffic, and are also adjacent to the identified off-site noise receptors. Future, noise levels were forecasted along 10 roadway segments along Crenshaw Boulevard, Martin Luther King Jr. Boulevard, Stocker Street, Santa Rosalia Drive, Marlton Avenue, and Vernon Avenue during the peak Proposed Project traffic periods during both weekdays and weekends (i.e., Saturday Midday). The greatest mobile noise increase would be 0.5 dBA in terms of the community noise equivalent level (CNEL) and would occur along Marlton Avenue between Martin Luther King Jr. Boulevard and Santa Rosalia Drive. As such, mobile noise generated by the Proposed Project would not cause the ambient noise level to increase by 3 dBA CNEL, meaning the Proposed Project falls below the most stringent of the significance thresholds.

d) OPERATION – GROUND-BORNE VIBRATION

As a mixed-use Regional Center, the Proposed Project would not include large stationary sources of ground-borne vibration, such as heavy equipment operations. In the case of the Proposed Project, operational ground-borne vibration would be generated by vehicle travel on local roadways. Proposed Project vibration impacts were forecasted both in terms of potential building damage and annoyance to humans. Off-site sensitive land uses would be more than 25 feet from heavy vehicles traveling on area roadways as a result of the Proposed Project's operational activity. A large rubber-tired vehicle (e.g., a bus) traveling 30 miles per hour generates a vibration level of 0.017 inch per second at a distance of 25 feet. Thus, vibration levels would not exceed the potential building damage threshold of 0.3 inch per second. An operational vibration annoyance impact would result if sensitive receptors would be exposed to vibration levels of 72 VdB RMS or greater. Heavy vehicles (e.g., trucks) would generate the

highest vibration levels. The nearest off-site sensitive receptor would be at least 40 feet from heavy vehicles traveling on area roadways related to Proposed Project operations. At this distance, typical heavy vehicles would generate vibration levels of approximately 65.9 VdB RMS. This vibration level would not exceed the annoyance threshold of 72 VdB RMS.

e) OPERATION - SITE COMPATIBILITY (PROPOSED RESIDENTIAL USES)

On-site noise sensitive uses include the proposed residential uses located in the North and South Areas of the Project Site as well as the proposed hotel located in the South Area of the Project Site. Exterior noise levels at the on-site noise sensitive use locations within the northeastern and southeastern areas of the Project Site would be classified as "normally unacceptable," whereas exterior noise levels at the on-site noise sensitive uses located within the southwestern area of the Project Site would be classified as "conditionally acceptable." Exterior noise levels at the on-site noise sensitive uses located within the northwestern area of the Project Site would be classified as "normally acceptable" in terms of the 65-dBA City standard for multi-family and hotel uses. Based on the City's criteria, noise sensitive uses proposed for locations which are exposed to noise levels that are classified as either "conditionally acceptable" or "normally unacceptable" require a detailed analysis of the noise reduction requirements that must be made, and the needed noise insulation features, that would be included in the design for these buildings. As such, without special design features noise impacts at the on-site noise sensitive uses within the northeastern and southeastern areas of the Project Site would be significant. However, with compliance with the City's noise standards, impacts would be reduced to less than significant levels.

f) CUMULATIVE IMPACTS

The cumulative increase in future traffic noise levels at Project build out relative to the existing baseline, would be 1.1 dB or less in areas that can potentially be affected by the Proposed Project. This increase would be below the most stringent 3 dBA significance threshold. Heavy vehicle travel on area roadways attributable to cumulative development, as is the case with the Proposed Project, would result in operational vibration levels that would be below the significance thresholds for both building damage and human annoyance. Cumulative operational vibration impacts attributable to the Proposed Project and related project growth when combined are also anticipated to be below the significance thresholds for both building damage and human annoyance.

2. PROJECT DESIGN FEATURES

The following Project Design Features are relevant to operational on-site stationary noise:

PDF I-4: All rooftop mechanical equipment (i.e., HVAC units) shall be screened/enclosed and a rooftop parapet shall be provided to further shield the rooftop mechanical equipment from view.

PDF I-5: The building mechanical/electrical equipment shall be designed not to exceed 50 dBA L_{eq} (or 56.7 dBA CNEL) noise levels at the Project's exterior property lines. The building mechanical design shall be reviewed by a qualified acoustical consultant to ensure that the design meets the stated criteria. At Plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

3. FINDINGS

The Proposed Project will have a less than significant impact with respect to the following noise issues: (1) construction – ground-borne vibration, (2) operation – on-site stationary noise, (3) operation - off-site roadway noise, (4) operation – ground-borne vibration, and (5) site compatibility (proposed residential uses). No mitigation is required.

Incorporation of Project Design Features PDF I-4 and PDF I-5, will ensure that operational noise levels from on-site stationary noise sources remain less than significant.

4. RATIONALE FOR FINDINGS

The maximum vibration levels associated with the operation of on-site construction equipment are 0.089 inch per second and approximately 71.8 VdB RMS at the nearest off-site sensitive receptor which is the Baldwin Villa Plaza development located approximately 80 feet west of the Project Site. Sensitive receptors located further away from the Project Site would experience vibration levels which are lower than those identified above. These vibration levels would not exceed the FTA potential building damage threshold of 0.2 inch per second or the human annoyance threshold of 72 VdB RMS. As such, construction vibration impacts would be less than significant. No mitigation is required.

Proposed Project operations would generate noise from the following on-site sources: (1) parking areas, (2) mechanical equipment, and (3) outdoor entertainment areas. With regard to on-site parking facilities, subterranean parking facilities would not generate audible noise levels at any off-site sensitive receptor. The Baldwin Villa Plaza multi-family residential development is the nearest off-site noise sensitive receptor to an on-site area proposed for an above ground parking structure. Parking activity during Proposed Project operations would generate a maximum noise level increase of 0.3 dBA L_{eq} at the Baldwin Villa Plaza development. This maximum noise level increase would be inaudible in the context of the community noise environment. Therefore, parking activity during Proposed Project operations would result in a less than significant noise impact.

The highest ambient noise increase due to mechanical equipment noise would occur at the single- and multi-family residences located northwest of the Project Site. Operation of mechanical equipment at the Project Site would not increase ambient noise levels by 5 dBA or more, and would result in a less than significant noise impact.

The Proposed Project may include an open-air entertainment area within the southeast portion of the Project Site. Amplified sound equipment, if used during Proposed Project operations, would be positioned away from the off-site noise sensitive receptors. In addition, Proposed Project buildings would act as a noise barrier further reducing off-site noise levels generated by the use of on-site amplified noise equipment. These factors taken collectively would result in potential increases in noise levels at all off-site sensitive receptors from amplified sound equipment would be less than 5 dBA over existing ambient noise levels. For the reasons stated above, noise impacts from on-site stationary noise sources (parking areas, mechanical equipment, and outdoor entertainment areas) would be less than significant and no mitigation is required.

The maximum off-site roadway noise impact generated by Proposed Project operations during both the weekday and weekend peak travel periods would be 0.5 dBA CNEL, which would occur along Marlton Avenue between Martin Luther King Jr. Boulevard and Santa Rosalia Drive. Thus, increases in noise levels from Proposed Project operational mobile noise sources would not cause the ambient noise level to increase by 3 dBA CNEL, the most stringent of the

significance thresholds. As the maximum off-site roadway noise impact generated by Proposed Project traffic would be below the most stringent significance threshold, the Proposed Project would result in less than significant off-site mobile noise impacts during Proposed Project operations. No mitigation is required.

The Proposed Project would not include large stationary sources of ground-borne vibration, such as heavy equipment operations. In the case of the Proposed Project, operational ground-borne vibration would be generated by vehicular travel on the local roadways. Forecasted vibration levels would not exceed the established standards with regard to both building damage and human annoyance. Thus, impacts would be less than significant and no mitigation is required.

Multi-family and hotel uses, which are considered noise sensitive land uses, would be located on the Project Site. These on-site noise sensitive uses would be exposed to exterior noise levels that range from 51.3 to 74.7 dBA CNEL. Noise levels within the on-site noise sensitive uses located in the northwestern portion of the Project Site would be exposed to noise levels that are classified as "normally acceptable." Noise levels within the on-site noise sensitive uses located in the northeastern, southeastern, and southwestern portions of the Project Site would be exposed to noise levels that are classified as either "conditionally acceptable" or "normally unacceptable." Without special design features, noise impacts for the on-site noise sensitive uses that are located within areas that are classified as either "conditionally acceptable" or "normally unacceptable" would be significant. However, with compliance with the City's noise standards, impacts would be reduced to less than significant levels. No mitigation is required.

The Project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from lawn maintenance activities, mechanical equipment (e.g., air conditioning systems), and vehicle travel, among other typical community noise sources. As demonstrated above, noise impacts related to Project development would be less than significant. In addition, the related projects are of sufficient distance from the Project Site such that operational noise levels from these projects would not be audible at the Project Site and vice versa. As such, cumulative noise impacts related to long-term Proposed Project operations would be less than significant.

Related project development would also generate motor vehicle travel along area roadways. As the maximum cumulative increase in future traffic noise levels at Project build out relative to the existing baseline would be 1.1 dB or less in areas that can potentially be affected by the Proposed Project, cumulative off-site roadway noise impacts would be less than significant, as these levels of increase in roadway noise levels would be below the most stringent 3 dBA significance threshold. Cumulative operational vibration levels would not exceed the established thresholds for building damage and human annoyance. Thus, cumulative impacts would be less than significant and no mitigation is required.

5. REFERENCE

For a complete discussion of noise impacts with regard to off-site roadway noise and ground-borne vibration during Proposed Project operations, please see Section IV.I, Noise, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

I. POPULATION, HOUSING, AND EMPLOYMENT

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

The Proposed Project's construction phase would have no impact on the supply of housing units or population growth. The short-term employment opportunities would contribute to the local and regional economy but would not cause substantial population growth due to the temporary and highly specialized nature of the employment.

b) OPERATION

Operation of the Proposed Project would not result in impacts regarding growth projections or regarding consistency with the regulatory framework. The Proposed Project would create 961 new housing units and generate a new residential population of approximately 2,518, as well as generate a net increase of approximately 1,760 on-site employees (i.e., total on-site employment at Proposed Project build out is forecasted to be 3,887 employees). Both the projected residential and jobs growth are consistent with SCAG's short-term and long-term growth projections for the City of Los Angeles, and help the City meet its housing obligation under the SCAG Regional Housing Needs Assessment allocation.

The Proposed Project also would be consistent with growth projections in other applicable plans and thus not result in impacts to those plans. The Proposed Project represents a mixed-use development that would add residential, office, commercial, hotel, retail and restaurant uses to a developed area within the West Adams–Baldwin Hills–Leimert Community Plan area. The types and amounts of proposed on-site development would be within the range anticipated in applicable policies and growth projections, including the City's General Plan Framework, West Adams–Baldwin Hills–Leimert Community Plan, General Plan Housing Element, and regional/SCAG policies. The Proposed Project also represents infill development that supports the development of increased population density within an existing urbanized area of the City and provides enhanced retail and restaurant uses as well as new hotel, residential, and office uses to serve the existing nearby population.

The Proposed Project would not result in any significant impacts regarding the introduction of unplanned infrastructure. The Proposed Project is an infill development in an urban area with an established infrastructure system. The Proposed Project would add no new infrastructure other than that needed to serve the Project Site. The Proposed Project would also link with, and tie into, an existing infrastructure system. New infrastructure that would be required (e.g. service connections to local water and sewer systems) would be sized to serve the Proposed Project's needs. No new off-site roadways would be created as part of the Proposed Project. The Proposed Project would also not open a new area currently underserved by infrastructure nor add new facilities that would encourage growth, not otherwise planned in the Project vicinity.

c) CUMULATIVE IMPACTS

The analysis of cumulative development in the EIR included related projects in the Project vicinity within the West Adams–Baldwin Hills–Leimert Community Plan area. The cumulative impact analysis addresses the impacts of known and anticipated development in the Project vicinity, in combination with the Proposed Project, with respect to the projected amounts and distribution of population, housing, and employment. As set forth in detail in the EIR, cumulative population and housing increases represented by the related projects combined with the Proposed Project are within SCAG's growth projections for the West Adams–Baldwin Hills–Leimert Community Plan area and the City as a whole for SCAG's planning horizon and would not result in cumulatively significant impacts with respect to growth in these areas.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

Project impacts related to population, housing, and employment would be less than significant. No mitigation is required.

4. RATIONALE FOR FINDINGS

Proposed Project construction would not result in housing, population, or employment growth that substantially exceeds projected/planned levels, resulting in a significant adverse physical change in the environment. The Proposed Project's construction phase would have no impact on the supply of housing units or population growth and would create work for a large number of construction workers over the course of Proposed Project development. Construction workers would be drawn from a regional pool of workers. The short-term and highly specialized employment opportunities would contribute to the local and regional economy. For these reasons, impacts would be less than significant, and no mitigation is required.

Proposed Project operation would also not result in housing, population, or employment growth that substantially exceeds projected/planned levels, resulting in a significant adverse physical change in the environment.

Proposed Project operation would not result in impacts regarding growth projections or consistency with the regulatory framework. The Proposed Project would create housing units, would not displace existing housing units, and would generate new residential population and employment opportunities consistent with SCAG's short-term and long-term growth projections for the Community Plan area and the City of Los Angeles, which helps the City meet its housing obligation under the SCAG RHNA allocation. Thus, impacts regarding the relationship of the Proposed Project to SCAG growth projections would be less than significant, and no mitigation is required.

The Proposed Project also would not result in impacts regarding consistency with growth projections in other applicable plans. The types and amounts of development proposed under the Proposed Project would be within the range anticipated in applicable policies and growth projections, including the City's General Plan Framework, West Adams–Baldwin Hills–Leimert Community Plan, General Plan Housing Element, and regional/SCAG policies. Therefore, impacts regarding consistency with the land use regulatory framework would be less than significant, and no mitigation is required.

The Proposed Project would not result in any significant impacts regarding the introduction of unplanned infrastructure. The Proposed Project would not add any new infrastructure other than that needed to serve the Project Site. New infrastructure that would be required would be sized to serve the Proposed Project's needs. Therefore, impacts regarding growth associated with the provision of new infrastructure would be less than significant, and no mitigation is required.

Cumulative population and housing increases represented by the related projects combined with the Proposed Project are within SCAG's growth projections for the West Adams–Baldwin Hills–Leimert Community Plan area and the City as a whole and would not result in cumulatively significant impacts with respect to growth in these areas. Therefore, the Proposed Project's incremental contribution to growth would therefore be less than cumulatively considerable, and

would not contribute to a cumulatively significant impact with respect to growth projections. No mitigation is required.

5. REFERENCE

For a complete discussion of population, housing, and employment impacts, please see Section IV.J., Population, Housing, and Employment, of the Draft EIR; and Section III, Corrections and Additions, of the Revised Draft EIR.

J. PUBLIC SERVICES – FIRE PROTECTION

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

Proposed Project construction would result in an increased demand for fire services due to the potential exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources such as machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, construction managers and personnel would be trained in fire prevention and emergency response in compliance with Occupational Safety and Health Administration ("OSHA") and Fire and Building Code requirements. Implementation of fire safety measures would reduce the effects of construction on the demand for fire protection services. The Proposed Project's construction activities may also involve temporary lane closures and construction-related traffic could result in increased travel time for emergency response vehicles due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction as well as other Project-related construction activities.

b) OPERATION

The Proposed Project would increase occupancy of the Project Site and would generate a greater demand for fire protection services than under existing conditions. The Proposed Project would provide hydrants capable of delivering 12,000 gallons per minute (gpm) to meet the Los Angeles Fire Department's (LAFD) fire flow requirements for the proposed development and would implement all LAFD requirements related to fire-resistant building materials and fire-safe building design. The Project Site is within 0.6 mile of Fire Station No. 94, which houses a truck and engine company; therefore, the Project Site is within the Los Angeles Municipal Code (LAMC) maximum response distance for residential land uses and for commercial land uses. Nonetheless, all applicable structures would be equipped with automatic sprinkler systems. Emergency access to the Project Site would be provided by the adjacent roadways and interior roads within the Project Site. In addition, a project design feature has been proposed that would provide access for LAFD apparatus and personnel to and into all proposed structures. Additionally, to ensure adequate fire protection services to the Project Site, as a condition of approval the Project Applicant would be required to submit a plot plan to the LAFD for approval during the Los Angeles Department of Building and Safety plan check process which would identify the minimum fire flow requirements and the location of fire hydrants to ensure adequate fire flow to the Project Site. The Proposed Project would also include implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The provision of adequate fire flow and fire safety design would reduce fire hazard and demand for fire safety services. The LAFD has indicated that existing facilities and equipment are adequate to meet the current demand for LAFD services in the Project area and the development of the Proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Furthermore, the Proposed Project would comply with

all applicable State and local codes and ordinances as well as guidelines found in the Safety Element of the General Plan. In addition, increased traffic on local roadways attributable to the Proposed Project could potentially affect response times in the area during Proposed Project operation.

c) CUMULATIVE IMPACTS

The 39 related projects would cumulatively generate the need for additional fire protection and emergency medical services from the LAFD that would be provided by Fire Station Nos. 94, 34, and 66 (see Draft EIR Section III). Although a cumulative demand on LAFD services would occur, cumulative project impacts on fire protection and medical services would be reduced through regulatory compliance, similar to the Proposed Project. As such, all related projects would be subject to review by the LAFD for compliance with Los Angeles Fire Code and Los Angeles Building Code regulations related to emergency response, emergency access, fire flow, and fire safety requirements. Further, project-by-project traffic mitigation, multiple fire station response, and system-wide upgrades to improve response times among other requirements that are anticipated to be implemented by the LAFD are expected to continue to support adequate response times. Overall, the Proposed Project would not have a cumulatively considerable incremental effect upon fire protection services and the Proposed Project's cumulative impact would be less than significant.

2. PROJECT DESIGN FEATURES

The following Project Design Features are relevant to fire protection:

PDF K.1-1: Prior to recordation of a final map or the approval of a building permit, the applicant shall submit the plot plan for review and approval by the Los Angeles Fire Department.

PDF K.1-2: No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant.

PDF K.1-3: Access for Los Angeles Fire Department apparatus and personnel to and into all structures, including the proposed parking facilities, shall be provided.

3. FINDINGS

The Proposed Project's public service impacts to fire protection and emergency medical services would be less than significant. No mitigation is required.

Incorporation of Project Design Features PDF K.1-1 through PDF K.1-3, will ensure that fire protection and emergency medical service impacts remain less than significant.

4. RATIONALE FOR FINDINGS

The implementation of Best Management Practices (BMP) associated with construction mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. While Proposed Project construction could have the potential to adversely affect fire access to and around the Project Site, these impacts are considered to be less than significant for the following reasons: (1) emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD; (2) construction impacts are temporary in nature and do not cause lasting effects; and (3) partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles,

the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. In addition, flagmen, as required, would be used to facilitate traffic flow until construction is complete. Based on the above reasons, construction of the Proposed Project would not be expected to affect fire protection service and emergency medical services (EMS) to the extent that there would be a need for any additional new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Thus, construction-related impacts to fire protection and EMS would be less than significant. No mitigation is required.

With regard to Proposed Project operations, the increased occupancy that would occur under the Proposed Project would require fire protection and EMS services. Even though the Project Site is within the LAMC maximum response distance for residential and commercial land uses, all applicable structures would be equipped with automatic sprinkler systems. The LAFD has also indicated that existing facilities and equipment are adequate to meet the current demand for LAFD services in the Project area and the development of the Proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain acceptable levels of fire protection service. Furthermore, the Proposed Project would comply with all applicable State and local codes and ordinances as well as guidelines found in the Safety Element of the General Plan that address fire and life safety issues. As such, impacts would be less than significant and no mitigation is required.

Water for fire flows in the vicinity of the Project Site is provided by the Los Angeles Department of Water and Power (LADWP). The LADWP indicates that the following infrastructure is currently in place to serve the Proposed Project: an 8-inch main in Stocker Street, an 8-inch main in Santa Rosalia Drive, an 8-inch main in Marlton Avenue, a 6-inch main in 39th Street, a 24-inch main in Crenshaw Boulevard, and an 8-inch main in Martin Luther King Jr. Boulevard. Furthermore, the maximum static pressure to the area is 118 psi with a minimum static pressure of 87 psi. The LADWP indicates that the current water pressure and water supply meet the requirements of the LAFD for the provision of fire flow to the Project Site with the development of the Proposed Project. Final fire flows would be reviewed through the Los Angeles Department of Building and Safety's standard review and permitting procedures to ensure that they are adequate and meet the requirements of the LAMC, the Los Angeles Fire Code, and the requirements of the LAFD. As such, impacts would be less than significant and no mitigation is required.

While Project-specific intersection and roadway improvements would help to reduce Project-related traffic impacts on area intersections and roadways, traffic conditions would not be mitigated to less than significant levels for four intersections as discussed in Section IV.L, Transportation and Circulation, of the Draft EIR. These effects could potentially affect response times in the area during Proposed Project operation. However, increases in traffic would not greatly affect emergency vehicle travel since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. This impact is not considered significant since emergency response times would not be substantially affected given that there is a significant traffic impact at limited locations as well as the availability of alternative routes within the street pattern in the area surrounding the Project Site. Based on the above considerations, it is anticipated that the LAFD would be able to respond to on-site and off-site areas within the established response time. In addition, Proposed Project development incorporates provisions to ensure emergency access (vehicles and personnel) to all portions of the Project Site. As such, impacts would be less than significant and no mitigation is required.

Operation of the related projects is anticipated to increase the overall demand for fire protection services provided by Fire Station Nos. 94, 34, and 66. Specifically, there would be increased

demands for additional LAFD staffing, equipment, and facilities at these stations over time to serve these additional land uses. These needs would be funded via existing mechanisms (i.e., property taxes and government funding), to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be subject to Title 24 of the State building code regulations and individually subject to LAFD review and compliance with all applicable construction-related and operational fire safety requirements of the LAFD and the City, including the City's Building and Fire Codes. With regard to emergency access, emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in lanes of opposing traffic. Overall, the Proposed Project would not have a cumulatively considerable incremental effect upon fire protection services and the Proposed Project's cumulative impact would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of fire protection impacts, please see Section IV.K.1, Public Services – Fire Protection, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

K. PUBLIC SERVICES – POLICE

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

The Proposed Project would result in an increased demand for police services due to the temporary, on-site storage of equipment and building materials, which could result in theft and vandalism. This could potentially necessitate police involvement unless adequate safety and security measures are implemented to secure the Project Site. As Proposed Project construction would include security features such as fencing all construction areas prior to the start of construction, providing security lighting at construction areas, and providing on-site security personnel at construction sites, demand on police protection services during Proposed Project construction would be reduced. The Proposed Project's construction activities may also involve temporary lane closures and construction-related traffic could result in increased travel time for emergency response vehicles due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction as well as other Project-related construction activities.

b) OPERATION

The Proposed Project's residential population of 2,518 residents would result in a 1.32 percent increase in the current Southwest Community Police Station's service population of approximately 190,693 residents. This increase in residents would decrease the current officer-to-resident ratio of 1.85 officers per 1,000 residents to 1.82 officers per 1,000 residents. Therefore, the Proposed Project's increase in resident population would result in a negligible change to the Southwest Community Police Station's officer-to-resident ratio if no additional officers were added to the station. Further, a substation operates on the Project Site for reporting non-emergency crimes. Nonetheless, it is important to note that the Proposed Project is expected to increase human activity on the Project Site. Therefore, the potential for crime on and around the Project Site may increase. The Proposed Project, in response to this potential, would include features to incrementally reduce the increase in impacts to Los Angeles Police Department (LAPD) services. In addition, increased traffic on local roadways attributable to the Proposed Project could potentially affect response times in the area during Proposed Project operation.

c) CUMULATIVE IMPACTS

The 39 related projects would cumulatively generate the need for police services. Cumulative development under the Proposed Project would decrease the Southwest Community Police Station's officer-to-resident ratio from 1.85 officers per 1,000 residents to 1.76 officers per 1,000 residents if no additional officers were added to the station. It is not anticipated that expansion, consolidation, or relocation of LAPD station(s) would be needed to address this change. Furthermore, the Proposed Project's contribution to the increase in service population would represent approximately 1.32 percent of the current Southwest Community Police Station's service population. During operation, the Proposed Project and the related projects would increase traffic levels in the LAPD's service area, as discussed in Section IV.L, Transportation and Circulation, of the Draft EIR. These effects could potentially affect response times in the area after build out of the Proposed Project and related projects. Similar to the Proposed Project, the related projects would generate revenue to the City's general fund that could be used to fund LAPD expenditures as necessary to offset the cumulative incremental impact on police services. Furthermore, the larger related projects would likely have on-site security personnel and safety features like those of the Proposed Project that would further reduce demands on police services.

2. PROJECT DESIGN FEATURES

The following Project Design Features are relevant to police protection:

PDF K.2-1: During construction activities, the Project Applicant shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging that are adjacent to existing public roadways be secured to prevent trespass.

PDF K.2-2: The Project Applicant shall develop and implement a Security Plan in consultation with the LAPD outlining the security services and features to be provided in conjunction with the Proposed Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD Southwest Area Commanding Officer. Said security plan may include some or all of the following components:

- Provisions for an on-site private security force for the Proposed Project On-site security services shall provide a 24-hour presence. Security officers shall be responsible for patrolling all common areas including the service corridors and alleys, parking garages and lots, and stairwells.

- The parking garages shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that would provide a direct connection with the on-site security force or LAPD 911 emergency response system.

- The proposed security plan shall incorporate low-level and directional security lighting features to effectively illuminate Project entryways, seating areas, lobbies, elevators, service areas, and parking areas with sufficient illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

3. FINDINGS

The Proposed Project's public service impacts to police services would be less than significant. No mitigation is required.

Incorporation of Project Design Features PDF K.2-1 and PDF K.2-2, will ensure that police service impacts remain less than significant.

4. RATIONALE FOR FINDINGS

With the implementation of construction site security measures the Proposed Project would result in a less than significant impact on police protection services during construction, as temporary changes would not generate a demand for police facilities or services that could not be accommodated by the LAPD, and the Proposed Project would provide on-site security during construction. No mitigation is required.

The Proposed Project's increase in resident population would result in a negligible change to the Southwest Community Police Station's officer-to-resident ratio if no additional officers were added to the station. Consequently, it is not anticipated that any additional officers would be required at the Southwest Community Police Station to generally maintain current resident service ratios, or that expansion, consolidation, or relocation of this station would be needed. While the LAPD has stated that a project of this size would have a less than significant impact on police services in the Southwest Area, the LAPD recommends that it is available to provide input on crime prevention features appropriate for the Proposed Project. While Project-specific intersection and roadway improvements would help to reduce Project-related traffic impacts on area intersections and roadways, traffic conditions would not be mitigated to less than significant levels for four intersections as discussed in Section IV.L, Transportation and Circulation, of the Draft EIR. These effects could potentially affect response times in the area during Proposed Project operation. However, increases in traffic would not greatly affect emergency vehicle travel since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. This impact is not considered significant since emergency response times would not be substantially affected given that there is a significant traffic impact at limited locations, as well as the availability of alternative routes within the street pattern in the area surrounding the Project Site. As such, impacts to police services during Proposed Project operation would be less than significant. No mitigation is required.

The 39 related projects are anticipated to increase the overall demand for police services within the Southwest Area Community Police Station service area. Cumulative development would decrease the Southwest Community Police Station's officer-to-resident ratio from 1.85 officers per 1,000 residents to 1.76 officers per 1,000 residents if no additional officers were added to the station. It is not anticipated that expansion, consolidation, or relocation of LAPD station(s) would be needed to address this change. Furthermore, the Proposed Project's contribution to the increase in service population would represent approximately 1.32 percent of the current Southwest Community Police Station's service population. This incremental contribution to the cumulative effect is not considered significant. With regard to emergency access, emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in lanes of opposing traffic. Overall, as the Proposed Project would not result in a substantial incremental contribution to the cumulative demand for police protection services, the Proposed Project would have a less than significant cumulative police protection impact. No mitigation is required.

5. REFERENCE

For a complete discussion of police impacts, please see Section IV.K.2, Public Services – Police, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

L. PUBLIC SERVICES – SCHOOLS

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

The Project Site is located within the jurisdiction of the Los Angeles Unified School District ("LAUSD"). The LAUSD school closest to the Project Site is the Marlton School, located at 4000 Santo Tomas Drive, which is an elementary school that is located approximately a quarter mile south of the project site.

During Proposed Project construction, no increase in student enrollment at the local schools serving the Project Site is anticipated as construction workers are not anticipated to change their place of residence as a result of working at the Project Site. On-site construction activities, as well as construction traffic (e.g., worker travel, hauling activities, and the delivery of construction materials), could affect existing school traffic, pedestrian routes, or transportation safety in the Project vicinity. Construction staging and construction-related vehicle parking would occur on-site, and thus, not on or near school property. Further, the Project Applicant would implement Project Design Features K.3-1 and K.3-2 to maintain pedestrian and vehicular safety, and to avoid substantial inconvenience to pedestrians walking to and from the schools located in the Project vicinity.

b) OPERATION

According to the LAUSD, the schools that would provide educational services to the Project Site are Hillcrest Drive Elementary School, Audubon Middle School, and Dorsey High School. As the Proposed Project would introduce new residents to the Project Site, through new multi-family residential development and introduce new jobs and thus new employees who might move to the area to reside close to such new employment opportunities, the Proposed Project could generate new students who would attend nearby LAUSD schools. These new students would increase demand for school facilities and services. Based on student generation factors provided by the LAUSD, the proposed on-site residential and commercial uses would generate an increase of 655 elementary school students, 163 middle school students, and 327 high school students for a total of 1,145 students. None of the public schools serving the project site would have adequate capacity to accommodate the students generated by the Proposed Project. However, at the time the Draft EIR was prepared, the LAUSD was planning to construct four additional schools in the Project area that would increase student capacity beyond that currently available at the existing schools that would serve the project site. In addition, several public charter schools, private schools and magnet programs operated by LAUSD are in the Project vicinity. Should students generated by the Proposed Project choose to attend these schools, then the impacts identified above would be reduced. Thus, the analysis presented in the EIR is conservative in terms of identifying the potential impacts to the three identified LAUSD schools that serve the project site.

c) CUMULATIVE IMPACTS

A cumulative increase in the demand for school services is anticipated to occur with the development of future residential and non-residential projects, the Proposed Project itself, and

more specifically, the future household growth within the school boundaries of the LAUSD schools currently servicing the Project Site. Due to the various locations of the related projects and the local district boundaries determined by LAUSD, only 4 of the related projects would be served by Hillcrest Drive Elementary School, 11 related projects would be served by Audubon Middle School, and 8 related projects would be served by Dorsey Senior High School. These related projects would generate approximately 582 elementary school students, 144 middle school students, and 288 high school students, for a total of 1,014 students. Because the LAUSD schools that would serve the Proposed Project and the related projects would not have adequate capacity to accommodate the cumulative student generation, new or expanded elementary, middle, and high schools may be needed.

2. PROJECT DESIGNFEATURES

The following Project Design Features are relevant to public service impacts to schools:

PDF K.3-1: With regard to school bus access, the Applicant shall do the following:

- Prior to construction, contact the LAUSD Transportation Branch regarding potential impacts to school bus routes;
- Maintain unrestricted access around the Project Site for school buses during construction; and
- Comply with the provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

PDF K.3-2: The Proposed Project shall implement the following project design feature related to Pedestrian/Traffic Safety Access to ensure that:

- The Proposed Project shall not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- Maintain safe and convenient pedestrian routes to LAUSD schools (School Pedestrian Route Maps are available at www.lausd-oehs.org/saferoutestoschools.asp).
- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Install appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes shall avoid affected school sites, except when school is not in session. If that is infeasible, haul routes shall avoid affected schools during arrival and dismissal times.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, adjacent to school sites.

- The Proposed Project shall provide crossing guards when the safety of students may be compromised by construction-related activities at impacted school crossings.

- The Proposed Project shall install barriers and/or fencing to secure construction equipment and the Project Site to prevent trespassing, vandalism, and attractive nuisances.

- The Proposed Project shall provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

3. FINDINGS

The Proposed Project's public service impacts to schools would be less than significant. No mitigation is required.

Incorporation of Project Design Features PDF K.3-1 and PDF K.3-2, will ensure that public service impacts to schools remain less than significant.

4. RATIONALE FOR FINDINGS

During Proposed Project construction, no increase in student enrollment at the local schools serving the Project Site is anticipated as construction workers are not anticipated to change their place of residence as a result of working at the Project Site. On-site construction activities, as well as construction traffic (e.g., worker travel, hauling activities, and the delivery of construction materials), could affect existing school traffic, pedestrian routes, or transportation safety in the Project vicinity. Construction staging and construction-related vehicle parking would occur on-site, and thus, not on or near school property. In response to these issues, the Project Applicant would implement project design features to maintain pedestrian and vehicular safety, and to avoid substantial inconvenience to pedestrians walking to and from the schools located in the Project area. Thus, impacts to schools during Project construction would be less than significant and no mitigation is required.

The Proposed Project, as well as cumulative development, would result in student generation levels that exceed the available capacity at the existing traditional public schools that serve the Project Site. In response to these capacity constraints, the LAUSD is planning to build four new schools in the Project vicinity that would augment the student capacity that is available at the existing LAUSD-run schools that serve the Project Site. In addition, the Proposed Project and the related projects are required by State law, including Government Code Section 65995 and Education Code Section 17620, to pay fees at a specified rate for the funding of improvements and the expansion of school facilities prior to the issuance of building permits. In accordance with Senate Bill 50 (SB 50) enacted in 1998, payment of these fees is deemed to fully mitigate any Proposed Project, as well as related project, impacts to school facilities under CEQA. Therefore, with the payment of the required fees set forth by the Government Code and Education Code, both Proposed Project and cumulative impacts on schools would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of school impacts, please see Section IV.K.3, Public Services – Schools, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

M. PUBLIC SERVICES – RECREATION AND PARKS

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

According to the Community Plan Update Draft EIR, there are 19 parks and/or recreational facilities dispersed throughout the West Adams–Baldwin Hills–Leimert Community Plan Area (approximately 414.39 acres), including 11 pocket parks, 2 neighborhood parks, 5 community parks, and 1 regional park. Leimert Park, the closest park or recreational facility to the Project Site, is located approximately 0.7 mile southeast of the Project Site. No aspect associated with the construction of the Proposed Project would occur within or adjacent to Leimert Park and vehicular access to the park would be maintained at all times. The same is true with regard to all other parks located in the Project area. Proposed Project construction would result in a temporary increase in the number of workers to the Project area, thus, there is the potential for workers to utilize local park facilities. Generally, this increase is anticipated to be negligible, as construction workers are highly transient in their work location and would likely utilize park facilities near their place of residence and because lunch break times are typically not long enough (30 to 60 minutes) for the construction workers to take advantage of park facility services and return to work within the allotted time.

b) OPERATION

The majority of the park usage attributable to the Proposed Project would be by individuals who permanently reside at the Project Site, and the non-residential uses attributable to the Proposed Project would result in negligible, if any, increased demand at City recreation facilities. The Proposed Project would provide approximately 3.55 acres of useable common open space areas, including landscaped public areas, balconies. The Proposed Project also incorporates areas with recreational amenities and landscaped areas to help meet the park and recreational needs of the Proposed Project's residents within the areas of the Project Site dedicated to the new residential uses.

Regarding recreation capacity in the Project vicinity, within the West Adams–Baldwin Hills–Leimert Community Plan area, the 2020 parks-to-person ratio would be 0.64 acre per 1,000 residents. While the City has no plans to increase park and recreation facilities within the Community Plan area, the increase in residents under the Proposed Project would not be substantial enough to cause a substantial reduction in the parks-to-person ratio within the West Adams–Baldwin Hills–Leimert Community Plan area. The City's Public Recreation Plan (PRP) establishes long-range as well as short-/intermediate-range parkland standards. In order to meet the PRP's long range standard (i.e., 4 acres/1,000 residents), the Proposed Project would need to provide 6.55 additional acres of open space. However, it should be noted, that the PRP parkland standards are Citywide goals and are not requirements for individual development projects. The Proposed Project would be consistent with the PRP's short- and intermediate parkland standards when considering the park and recreational value of the Proposed Project's common open space areas. In addition, the Proposed Project's common open space areas would include extensive landscaping and outdoor seating areas and gathering spaces, and would create an inviting, aesthetically pleasing environment by converting what is currently an underutilized hardscape to a revitalized and publicly accessible pedestrian and recreational environment in an area of the City where such spaces are in limited supply. The Proposed Project would also meet the LAMC requirement for useable open space in that it would provide a total of 154,825 square feet (3.55 acres) of useable common open space, while also providing open space in the form of private balconies and a roof terrace that would be accessible to residents of the Project's residential units. In addition, the Proposed Project would pay the fees

required under LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax) to support the City's efforts to acquire and develop new community parks and recreational facilities.

c) CUMULATIVE IMPACTS

Of the 39 related projects (Draft EIR Section III), 16 are located within the boundaries of the West Adams–Baldwin Hills–Leimert Community Plan area and eight include residential development. Cumulative growth within the West Adams–Baldwin Hills–Leimert Community Plan area, would require a total of 15.92 acres of combined neighborhood and community parkland to meet the PRP's long-range objectives and 7.96 acres to achieve the PRP's short- and intermediate-range goals for parkland. When the population generated by the Proposed Project is added to the population of the related projects, the total cumulative increase in resident population would cause the park-per-person ratio to drop from 0.64 to 0.62 acre per 1,000 residents within the West Adams–Baldwin Hills–Leimert Community Plan area. However, this is a conservative analysis because it does not include the acreages of the 8.33-acre Martin Luther King Jr. Park and the 0.6-acre Monteith Park, which are located further than 0.25 mile outside the Community Plan area but within 2 miles of the Project Site and would serve the Proposed Project as well as relieve the demand on parks within the Community Plan area. Furthermore, the 285.59-acre Kenneth Hahn State Recreation Area, which is a regional park and is, therefore, not accounted for in the PRP's goals, is located 1 mile from the Project Site.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

The Proposed Project's public service impacts to recreation and parks would be less than significant. No mitigation is required.

4. RATIONALE FOR FINDINGS

During Proposed Project construction there is a potential for construction workers to utilize nearby parks. However, any resulting increase in park usage would be negligible, temporary, and would occur during off-peak park usage hours. In addition, Proposed Project construction would not interfere with existing park usage in a manner that would reduce the ability of the public to access and use each facility. As such, construction-related impacts associated with park facilities would be less than significant. No mitigation is required.

Whereas the Project Site is currently dominated by hardscape, including surface parking, the Proposed Project would provide 3.55 acres of common open space areas as well as landscaped public areas, balconies and other open space areas to help meet the park and recreational needs of the Proposed Project's residents. Through the introduction of extensive landscaping, and outdoor seating areas and gathering spaces, the Proposed Project would create a more inviting, aesthetically pleasing environment on the Project Site, converting what is currently an underutilized and aging site to an upgraded and publicly accessible community gathering space for visitors, residents and employees.

The Draft EIR considers potential use of off-site park facilities by Proposed Project employees and concludes such use would be limited by the amount of time it would take for on-site employees to access off-site local parks during the workday when the amount of time a typical employee has available for lunch is constrained. Further, employees would likely utilize parks facilities near their place of residence, rather than utilize park facilities within the Project vicinity

on their commute to and from the Project Site. Therefore, while some employee usage is anticipated to occur, impacts, if any, would be less than significant and no mitigation is required.

While the City indicated no plans to increase park and recreation facilities within the Community Plan area, the increase in residents to the area associated with the Proposed Project would not be substantial enough to cause a substantial reduction in the parks-to-person ratio within the West Adams–Baldwin Hills–Leimert Community Plan area, and as noted previously, the Proposed Project includes resident-only recreation and outdoor spaces.

The Proposed Project would not meet the PRP's long range standard (i.e., 4 acres/1,000 residents). However, the PRP parkland standards are Citywide goals and are not requirements for individual development projects. Notwithstanding, the Proposed Project would be consistent with the PRP's short- and intermediate standards when considering the park and recreational value of the Proposed Project's common open space areas. Applying the useable open space requirements set forth in LAMC Section 12.21, the Proposed Project is required to provide approximately a minimum of 154,825 square feet (3.55 acres) of useable open space. The Proposed Project would meet this requirement in that it would provide approximately 3.55 acres of useable common open space. The Proposed Project would also provide open spaces that would be accessible to residents of the Proposed Project's residential units. As such, the Proposed Project would meet and exceed the open space requirements of LAMC Section 12.21. In addition, the Proposed Project would pay the requisite fees required under LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). Pursuant to the provisions set forth therein, the payment of fees pursuant to LAMC Section 17.12 or the dedication of parkland or recreational facilities would be credited towards the fees required under LAMC Section 21.10.3(a)(1). The Proposed Project would comply with these LAMC requirements. Based on the analyses provided above, and expanded upon in the Draft EIR, Proposed Project impacts with regard to recreation and park facilities would be less than significant. No mitigation is required.

The Proposed Project in conjunction with future development projects would cumulatively generate the need for additional parks and recreation facilities. In response to this increased need for park space, the related projects would be required to comply with the parks and recreation requirements of the state Quimby Act discussed in the EIR and the LAMC. Furthermore, as with the Proposed Project, the related projects would be subject to review and permitting by the City and as part of that review would be required to pay fees or dedicate open space to address the park and recreational demands associated with those projects. Therefore, cumulative impacts on parks and recreational services would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of recreation and park impacts, please see Section IV.K.4, Public Services – Recreation and Parks, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

N. PUBLIC SERVICES - LIBRARIES

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

Project construction would result in a temporary increase in the number of workers to the Project area. Any increase in library usage by construction workers is anticipated to be

negligible, as construction workers are not likely to seek housing in the Project vicinity given the short-term and highly specialized nature of such employment and would likely utilize library facilities near their place of residence, and because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities near their worksites and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service (e.g., the hours of operation for the Baldwin Hills Branch Library are from 10:00 A.M.–8:00 P.M. (Mon. and Wed.), 12:30 P.M.–8:00 P.M. (Tue. and Thu.), 10:00 A.M.–6:00 P.M. (Fri. and Sat.), and closed Sunday).

b) OPERATION

Given the limitations of their work schedules, employees of the on-site commercial uses are not likely to patronize local libraries during work hours, as they are more likely to use libraries near their homes and during non-work hours. Additionally, the Los Angeles Public Library (LAPL) has indicated that non-residential development does not generally result in an increase in demand on library services.

Demand for library access and services will primarily be associated with the residential uses of the Proposed Project. The LAPL estimates that population within the Baldwin Hills Branch Library service area is 79,510 persons based on 2010 Census data. Based on forecasted growth rates, the Baldwin Hills Branch Library service area would have a 2020 population of 86,537. The Proposed Project would involve the construction of a total of 961 additional residential units. These additional residential units would result in a direct population increase of approximately 2,518 residents. To provide a conservative analysis, it is assumed that all population growth under the Proposed Project would be new to this library's service area. Under these forecasts, the Proposed Project's population growth would increase the 2020 service population of the Baldwin Hills Branch Library to approximately 89,055 persons.

According to the LAPL's *Branch Facilities Plan*, a service population of over 45,000 people requires a library facility of at least 14,500 square feet. The Baldwin Hills Branch Library is a 12,500-square-foot branch facility with a materials collection of approximately 45,477 items. Although the facility is undersized for the estimated service population based on these standards, the LAPL has indicated that the Baldwin Hills Branch Library currently meets the area's demand for library services. Additionally, the Exposition Park–Dr. Mary McLeod Bethune Regional Library, Jefferson Branch Library, Washington Irving Branch Library, Angeles Mesa Branch Library, Hyde Park Miriam Matthews Branch Library, and Vermont Square Branch Library, are all located nearby (within 4 miles) and, thus, would also be available for use by Proposed Project residents. Use of these libraries would reduce the Proposed Project's demand on the Baldwin Hills Branch Library.

c) CUMULATIVE IMPACTS

Of the 39 related projects, only 15 related projects would generate permanent residents who would potentially utilize the services of the Baldwin Hills Branch Library. As the LAPL has indicated that non-residential development does not increase demand on library services, only the residential development included in the related projects are utilized to assess cumulative impacts. The residential related projects would generate a total of approximately 6,635 residents. However, this number is overstated as it does not consider the extent to which the growth associated with the Proposed Project and related projects is already accounted for in the service population projections made by the LAPL. This cumulative population increase within the service area of the Baldwin Hills Branch Library would increase the demand for the services provided by this library.

2. PROJECT DESIGNFEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

The Proposed Project's public service impacts to libraries would be less than significant. No mitigation is required.

4. RATIONALE FOR FINDINGS

During construction, construction workers would likely utilize library facilities near their place of residence rather than near the Project Site, as their lunch break times are typically not long enough to take advantage of library facilities and return to work within the allotted time, and the libraries in the area are not open when construction workers are on their way to work. Therefore, construction-related impacts associated with LAPL library services would be less than significant. No mitigation is required.

During Proposed Project operations, employees of businesses on the Project Site are not likely to patronize the local libraries during work hours and are more likely to use libraries near their homes during non-work hours. Consistent with this conclusion, LAPL has indicated that non-residential development does not generally result in an increase in demand on library services. Library demand is therefore primarily associated with the Proposed Project residential units. Based on a conservative analysis in which it is assumed all population growth under the Proposed Project would be new to the Baldwin Hills Branch Library's service area, the service population of the area would be greater than the service population guidelines set forth in the LAPL's *Branch Facilities Plan.* Although the facility is undersized for the estimated service population based on these standards, the LAPL has indicated that the Baldwin Hills Branch Library currently meets the areas demand for library services. Additionally, there are 6 additional libraries located within 4 miles of the Project Site which would reduce the Proposed Project's demand on the Baldwin Hills Branch Library. Therefore, considering the LAPL facilities available within the Project area and the Proposed Project's nominal increased demand for library services, impacts would be less than significant. No mitigation is required.

As the LAPL has indicated that non-residential development does not increase demand on library services, only the residential development included in the related projects would increase the demand for library services in the Project area. It is anticipated that the related projects, as is the case with the Proposed Project, would be reviewed on a case-by-case basis to ensure that no significant impacts to library services would occur, and that some portion of the future residents are already residing within the service area. As such, cumulative impacts on libraries would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of library impacts, please see Section IV.K.5, Public Services – Libraries, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

O. TRANSPORTATION AND CIRCULATION – CONSTRUCTION; AND OPERATION - LOS ANGELES COUNTY CONGESTION MANAGEMENT PLAN, AND BICYCLE/PEDESTRIAN/VEHICULAR SAFETY

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

Construction traffic is expected to be generated by two primary sources: construction worker trips to and from the Project Site at the beginning and end of the workday, and haul truck traffic to and from the site throughout the day. Construction worker traffic would depend on not only the level of effort during various construction phases, but also on the mode and time of travel of the workers. Construction workers would be on-site before 6:00 A.M. and leave the site after 4:00 P.M. Therefore, the construction workers would be on-site before the morning commute peak period and would leave the site during the afternoon commute peak period. At most, there would be 167 construction workers on the Project Site on a given day. Those workers, according to the analysis completed for and integrated with the Draft EIR, would generate a maximum of 334 daily trips, with 167 outbound trips during the afternoon peak hour using a conservative set of assumptions for forecasting. Maximum forecasted on-site construction activity would generate 225 haul trips to and from the Project Site per day. Assuming a uniform distribution of haul trucks throughout the workday, the Project Site would generate a maximum of 90 passenger car equivalent (PCE) trips (45 inbound, 45 outbound) during each hour of the workday. When combined, construction worker trips and haul trips are expected to result in a total of 90 morning peak-hour trips (45 inbound, 45 outbound) and 257 afternoon peak-hour trips (45 inbound, 212 outbound). During construction, approximately 77,933 square feet of existing on-site commercial uses are expected to be closed and demolished. While all demolition is not anticipated to occur at the same time, a reduction of the trip-generating activity on the Project Site commensurate with the amount of demolition would occur. Since the construction worker and haul truck trips expected to be generated during the peak stages of construction are lower than the trips generated by the existing uses that will be removed, traffic from construction workers is not expected to result in a significant impact on the street system. During construction, an adequate number of parking spaces for construction workers would be available at all times either on the Project Site or in the Project vicinity. If needed, a shuttle to an off-site parking location for the construction workers would be provided.

Potential impacts associated with the physical construction of the Proposed Project, e.g., partial lane or sidewalk closures or loss of bus stops or parking, would be limited to those roadways immediately adjacent to the Project Site. Lane closures on the roadways would require a temporary reduction in lane capacity (one lane in one direction) and would cause delays for vehicles traveling in that direction and sidewalk closures would require the temporary rerouting of pedestrian traffic. Where possible, sidewalks and bus stops would remain open under protective construction shielding. On-street parking is currently only allowed on portions of Santa Rosalia Drive and Marlton Avenue, and qualitative observations indicate that this parking is seldom used. As such, the physical effects of Proposed Project construction would be limited.

b) OPERATION - LOS ANGELES COUNTY CONGESTION MANAGEMENT PLAN – ARTERIAL INTERSECTIONS AND MAINLINE FREEWAY LOCATIONS

The Los Angeles County Congestion Management Plan (CMP) is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in Los Angeles County. The CMP requires that a Traffic Impact Analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours.

There are five CMP arterial monitoring locations within the Proposed Project's traffic study area. Of the five arterial monitoring stations, only one (Intersection No. 25, Crenshaw Boulevard and Manchester Avenue) is forecasted to fall above the 50-trip CMP analysis threshold during one of the peak hours. Therefore, an arterial impact analysis was completed for that intersection alone. No further CMP analysis is required at the following four CMP arterial monitoring stations: (1) La Cienega Boulevard & Jefferson Boulevard, (2) La Cienega Boulevard & Stocker Street, (3) La Brea Avenue & Manchester Avenue, and (4) La Cienega Boulevard & Centinela Avenue. At the Crenshaw Boulevard and Manchester Avenue intersection, the Proposed Project is conservatively estimated to increase traffic by 51 trips (half in the northbound direction and half in the southbound direction) during the afternoon peak hour. Similarly, the Proposed Project is expected to increase traffic by 18 trips in the northbound direction and 17 trips in the southbound direction during the morning peak hour. The intersection of Crenshaw Boulevard and Manchester Avenue would operate at LOS C during the morning peak hour and LOS E during the afternoon peak hour in Year 2020 factoring in traffic from all sources. Because the intersection does not operate at LOS F, it does not meet the minimum threshold for identification of a significant impact.

Proposed Project traffic was also forecasted along three freeway locations along the I-10 freeway. Specifically, analyses were conducted on the I-10 east of Overland Avenue, the I-10 east of La Brea Avenue, and the I-10 at Budlong Avenue. None of the three freeway mainline monitoring stations are expected to experience Proposed Project trips above the 150-trip threshold during either peak hour. Therefore, no further freeway mainline analysis is required.

c) OPERATION – BICYCLE/PEDESTRIAN/VEHICULAR SAFETY

The Proposed Project's driveways would be designed pursuant to LAMC requirements that would ensure adequate sight distance, as well as bicycle and pedestrian safety. The Proposed Project incorporates transit hubs that offer safe and well-lit bicycle storage among other facilities. No hazard issues are expected to result due to the Proposed Project's access locations.

d) CUMULATIVE IMPACTS

Most of the related projects are not located in close proximity to the Project Site and may or may not be developed within the same construction schedule as the Project. Potential cumulative construction impacts for those related projects that are located in proximity of the Project Site would be addressed during the building permit process of the respective projects to ensure that any cumulative construction traffic impacts would be appropriately addressed. As, such, cumulative construction traffic impacts would be less than significant.

The Proposed Project's contribution to cumulative traffic conditions would result in trip levels and intersection operations that are below the CMP impact thresholds for both arterial monitoring stations and freeway locations.

The design for the Proposed Project's driveways take into consideration cumulative traffic conditions in the Project area. The Proposed Project's driveways would be designed pursuant to LAMC requirements that would ensure adequate sight distance, and bicycle and pedestrian safety, taking into consideration cumulative traffic conditions in the Project area.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

The Proposed Project will have a less than significant impact with respect to the following transportation and circulation issues: (1) construction, (2) Los Angeles County Congestion Management Plan arterial monitoring stations and freeway segments during Proposed Project operation, (3) bicycle, pedestrian, and vehicular safety during Proposed Project operations. No mitigation is required.

4. RATIONALE FOR FINDINGS

Construction traffic is expected to be generated by construction worker trips and haul truck traffic. Based on the Proposed Project's daily construction hours, construction workers would be on-site before the morning commute peak period and would leave the site during the afternoon commute peak period. Maximum daily construction worker and haul trips, when combined, are expected to result in a total of 90 morning peak-hour trips (45 inbound, 45 outbound) and 257 afternoon peak-hour trips (45 inbound, 212 outbound). The vehicle trips that would be eliminated due to demolition of existing uses on the Project Site as part of the Proposed Project are expected to be greater than the construction worker and haul truck trips that would occur during the peak stages of construction. Thus, there would be a net reduction in vehicle trips during Proposed Project construction. As vehicle trips would be reduced, Proposed Project construction traffic impacts would be less than significant.

During construction, an adequate number of parking spaces for construction workers would be available at all times either on the Project Site or in the Project vicinity. If needed, a shuttle to an off-site parking location for the construction workers would be provided. Thus, parking impacts during Proposed Project construction would be less than significant.

Potential impacts associated with physical construction of the Proposed Project, e.g., partial lane or sidewalk closures or loss of bus stops or parking, would be limited to those roads immediately adjacent to the Project Site. As the physical effects of Proposed Project construction would be limited, physical construction impacts would be less than significant. As Proposed Project construction impacts on an individual and overall basis would be less than significant, no mitigation is required.

The CMP analysis identified five arterial monitoring stations and three freeway locations within the traffic study area that required analysis pursuant to the CMP guidelines. Of the five arterial monitoring stations, only one (Intersection #25, Crenshaw Boulevard and Manchester Avenue) is expected to fall above the 50-trip CMP analysis threshold during one of the peak hours. Therefore, impacts would be less than significant at the other four arterial monitoring locations (La Cienega Boulevard & Jefferson Boulevard, La Cienega Boulevard & Stocker Street, La Brea Avenue & Manchester Avenue, and La Cienega Boulevard & Centinela Avenue). As the intersection of Crenshaw Boulevard and Manchester Avenue would operate at LOS C during the morning peak hour and LOS E during the afternoon peak hour in Year 2020 with traffic from all sources factored in, it does not meet the minimum threshold for identification of a significant CMP arterial monitoring station impact. At all three freeway monitoring locations (I-10 east of Overland Avenue, I-10 east of La Brea Avenue, and I-10 at Budlong Avenue), Proposed Project trips would be below the CMP 150-trip threshold during either peak hour. Therefore, Proposed Project impacts at the five CMP arterial monitoring stations and three CMP freeway locations within the traffic study area would be less than significant. No mitigation is required.

No hazard issues are expected to result at the Proposed Project's access locations at all Proposed Project driveways would be designed pursuant to LAMC requirements which would

ensure adequate sight distance, and bicycle and pedestrian safety. As such, impacts would be less than significant and no mitigation is required.

Cumulative construction traffic impacts would only occur to the extent that Proposed Project construction occurs at the same as the construction of those related projects that are located in proximity to the Project Site. In these cases, potential cumulative construction traffic impacts would be addressed during the building permit process of the respective projects to ensure that any cumulative construction traffic impacts would be appropriately addressed. As, such, cumulative construction traffic impacts would be less than significant and no mitigation is required.

The Proposed Project's contribution to cumulative traffic conditions would result in less significant impacts at the five Los Angeles County Congestion Management Plan arterial monitoring stations and at the three freeway locations located in the Project area.

The design for the Proposed Project's driveways take into consideration cumulative traffic conditions in the Project area. As the Proposed Project's driveways would be designed pursuant to LAMC requirements which would ensure adequate sight distance, and bicycle and pedestrian safety, no hazard issues are expected based on cumulative traffic conditions in the Project area. As such, cumulative impacts would be less than significant and no mitigation is required.

5. REFERENCE

For a complete discussion of transportation and circulation impacts with regard to construction, Los Angeles County Congestion Management Plan arterial monitoring stations and freeway segments, and bicycle, pedestrian, and vehicular safety during Proposed Project operations, please see Section IV.L, Transportation and Circulation, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

P. UTILITIES AND SERVICES—WASTEWATER

1. DESCRIPTION OF EFFECTS

a) WASTEWATER TREATMENT FACILITIES

The Proposed Project would not involve the discharge of any chemicals or pollutants into the sewer treatment system beyond those commonly associated with residential and commercial land uses including retail, restaurant, hotel, and office uses. No point source pollution sources, such as industrial or manufacturing facilities are proposed as part of the Proposed Project. Wastewater generated by the Proposed Project would be discharged into the sanitary sewer and conveyed to the Hyperion Treatment Plant (HTP), where the effluent would be treated to acceptable Los Angeles Regional Water Quality Control Board (RWQCB) water quality and treatment standards prior to being discharged into the Pacific Ocean.

The Proposed Project is estimated to generate a net increase of 271,135 gallons per day (gpd) of wastewater, without taking into account wastewater reductions due to water conservation measures. As a result actual wastewater generation would be anticipated to be less than the forecast presented above. The HTP has a remaining capacity of 88 million gallons per day (mgd). Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the City's Integrated Resources Plan (IRP).

b) WASTEWATER CONVEYANCE FACILITIES

The Proposed Project would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. The City of Los Angeles Bureau of Sanitation has provided recommendations with regard to how the Proposed Project would connect to the sewer lines serving the North and South Areas of the Project Site. Specifically, within the North Area, the Bureau of Sanitation has advised that Proposed Project sewer flows from this area would be split among the existing sewer lines located in Marlton Avenue, Martin Luther King Jr. Boulevard, and Crenshaw Boulevard. Within the South Area, while the 10-inch line beneath Crenshaw Boulevard has a remaining capacity of 12 percent (44,520 gpd), the Bureau of Sanitation has advised that this line is currently flowing at full capacity between Martin Luther King Jr. and Stocker Street and no new connections would be made to that sewer line. Accordingly, the South Area sewer flows would need to be split among existing sewer lines located on Marlton Avenue and Martin Luther King Jr. Boulevard. A table summarizing the existing sewer lines in the North Area and South Area is included as Table IV.M.1-1 in the Draft EIR.

The combined available capacity remaining within the 8-inch lines under Marlton Avenue and Martin Luther King Jr. Boulevard is approximately 392,780 gpd. Since gauging data is not currently available for the Crenshaw lines, it is not possible to determine if additional capacity is available to serve the North Area. Nevertheless, based on the Proposed Project's net increased flows of 271,135 gpd within the entire Project Site (which would be split among the existing North and South Area infrastructure), and the remaining capacity of 392,780 gpd within the two sewer lines for which data is available, it has been determined that the Proposed Project's wastewater flows from the North Area can be adequately accommodated by the existing infrastructure serving the North Area.

In the South Area, the 12-inch sewer line under Marlton Avenue has a remaining flow capacity of 283,880 gpd. No gauging information is available at this time to determine the available capacity of the 10-inch line under Martin Luther King Jr. Boulevard. Nevertheless, based on the anticipated net increase of 271,135 gpd for the entire Project Site), there is currently adequate capacity remaining in the Marlton Avenue sewer line to accommodate the increased flows generated by the Proposed Project. Thus, no infrastructure upgrades would be needed to connect to the local wastewater infrastructure adjacent to the Project Site.

c) CUMULATIVE IMPACTS

Each of the related projects (see Section III of the EIR), individually and cumulatively, will result in cumulative increases in wastewater generation and demand for wastewater treatment service. However, implementation of the IRP would enable the City to adequately convey wastewater to the treatment plants with minimal potential for sewage spills. The IRP also sets forth the measures that will enable the City to treat future wastewater flows in a way that protects public health and safety and meets regulatory requirements, thereby protecting the environment. As such, the cumulative impact of the related projects in combination with the Proposed Project and other anticipated growth within the HTP service area on wastewater facilities would be less than significant.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. FINDINGS

Impacts to wastewater facilities with the development of the Proposed Project would be less than significant. No mitigation is required.

4. RATIONALE FOR FINDINGS

As discussed above and in the Draft EIR, the Proposed Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the IRP. As such, impacts are less than significant and no mitigation is required.

Additionally, the Proposed Project's wastewater flows can be adequately accommodated by the existing infrastructure serving the Project vicinity. Further, the Proposed Project would comply with all applicable regulatory requirements which include the Proposed Project obtaining approval of a sewer permit from the City and the payment of Sewerage Facilities Charges pursuant to Los Angeles Municipal Code Sections 64.11 and 64.12. As such, impacts are less than significant and no mitigation is required.

With regard to cumulative impacts, implementation of the IRP would enable the City to adequately convey wastewater to the City's treatment plants with minimal potential for sewage spills, thereby protecting public health and safety. Further, the IRP also sets forth the measures that would enable the City to treat future wastewater flows in a way that protects public health and safety and meets regulatory requirements, thereby protecting the environment. Therefore, the wastewater impacts of the related projects in combination with the Proposed Project would result in a less than significant cumulative impact. No mitigation is required.

5. REFERENCE

For a complete discussion of utilities and services impacts with regard to wastewater, please see Section IV.M.2, Utilities and Services - Wastewater, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

Q. UTILITIES AND SERVICES—ENERGY

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

During the Proposed Project's construction phase, existing on-site electrical and natural gas service equipment would be relocated and reconfigured as part of the Proposed Project's overall site improvement plan. Additional electrical conduits, wiring, and associated infrastructure would be installed. Infrastructure required for natural gas service would also be installed. All improvements to the electrical and natural gas infrastructure, including a potential new on-site electrical transformer, would occur on-site. No substantive utility outages are expected when hooking up the Proposed Project to the area infrastructure. In the unlikely event that a service disruption does occur, it would be for a short duration. No roadway closures or access restrictions would be required during the implementation of upgrades to the electricity or natural gas distribution systems that would support Proposed Project development.

b) OPERATION - ELECTRICITY

Development of the Proposed Project would increase the existing demand for electricity service in the Project vicinity. Electrical service to the Project Site is delivered by LADWP. The Proposed Project would be able to hook up to, and be served by, the existing power grid. The estimated net increase in electricity consumption by the Proposed Project would be approximately 17,503,347 kilowatt hours (kWh) per year.

LADWP has indicated that there are no known problems or deficiencies in the Project vicinity. LADWP has also indicated the Proposed Project would require on-site facilities that would facilitate the delivery of electrical service to each of the future buildings located within the Project Site. In addition, LADWP has stated the cumulative effects of this and other projects in the area would require LADWP to construct additional distribution facilities in the future. However, there are currently no identified infrastructure projects directly related to the potential implementation of the Proposed Project, and, thus, it would be highly speculative to analyze potential impacts related to the potential need for additional distribution facilities. To address this issue, LADWP has recommended that the Project Applicant should contact a LADWP-approved engineering office to determine the Proposed Project infrastructure needs at the time when a connection to the electrical infrastructure system would occur.

c) OPERATION - NATURAL GAS

The Proposed Project would increase demand for natural gas service in the Project vicinity. The Proposed Project's net natural gas demands are estimated to be approximately 7,013,677 cubic feet (cf) per month of natural gas. The Southern California Gas Company (SCG) manages the pipelines adjacent to the Project Site. There are no known natural gas service problems or deficiencies in the Project vicinity. If problems/deficiencies were to exist, appropriate actions (e.g., pressure betterments, natural gas supplies) would be initiated by the SCG to solve any unanticipated problems that may arise. While regional supplies and the local off-site infrastructure are anticipated to be available and sufficient to meet the needs of the Proposed Project, the adequacy of the local infrastructure system would need to be confirmed at the time a connection to the off-site infrastructure system occurs. While no disruptions to service is anticipated when these connections occur, "hooking-up" disruptions may occur. In the unlikely event that a service disruption does occur, it would be for a short duration.

In addition, the Proposed Project would comply with the City of Los Angeles Green Building Code which would reduce energy consumption by requiring the Proposed Project to include energy conservation, energy efficiency, and increasing renewable energy use at the Project Site.

d) CUMULATIVE IMPACTS

All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24 of the California Code of Regulations and the City's Green Building Code. It is possible that implementation of the related projects (and other development in the greater Los Angeles area) could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Thus, it is possible that with implementation of some of the related projects and other development, the resulting demand for electricity and natural gas supply could be the same or less than the existing condition. Nonetheless, both LADWP and the SCG undertake expansion or modification of service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electricity and natural gas service. Any potential cumulative impacts related to

electricity and natural gas service would be addressed through this process. For these reasons, cumulative impacts related to electricity and natural gas supply would be less than significant.

Development of the Proposed Project, in combination with the related projects, could create an increased demand for electricity and natural gas supplied by LADWP and SCG, respectively. The cumulative effect of the Proposed Project and other new and added demand on the electricity and natural gas distribution system may require near term and/or future additions to distribution system capacity. These cumulative effects may require LADWP and SCG to construct additional distribution facilities.

2. PROJECT DESIGN FEATURES

The Proposed Project would implement the following project design features to reduce on-site electricity and natural gas consumption:

- The Applicant shall meet or exceed all Title 24 energy conservation requirements as they apply in the City of Los Angeles.

- The Project shall reduce electricity needs for new facilities associated with the Project by at least 10 percent from current rates associated with existing facilities. Energy conservation measures may include: education on energy conservation; energy efficient lighting; use of solar panels; or participation in LADWP's Green Power Program.

3. FINDINGS

The Proposed Project will have less than significant impacts with respect to electricity consumption. No mitigation is required.

The Proposed Project will have less than significant impacts with respect to natural gas consumption. No mitigation is required.

The Proposed Project will have less than significant impacts with respect to construction and improvements to electrical and natural gas infrastructure. No mitigation is required.

4. RATIONALE FOR FINDINGS

The Proposed Project is located in an area already served by existing electricity and natural gas infrastructure, and would likely not require extensive infrastructure improvement to serve the Project Site. Construction and operation of the Proposed Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities.

Further, all new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24 of the California Code of Regulations and the City's Green Building Code. The City of Los Angeles Green Building Ordinance emphasizes improving energy conservation, energy efficiency, and increasing renewable energy generation. The Proposed Project's design features would advance these objectives. For these reasons, impacts associated with energy would be less than significant. No mitigation is required.

With regard to cumulative impacts, LADWP and SCG undertake expansion or modification of service infrastructure and distribution systems to serve future growth in the City as required in

the normal process of providing electricity and natural gas service. Therefore, cumulative impacts related to electricity and natural gas supply would be less than significant. No mitigation is required.

5. REFERENCE

For a complete discussion of utilities and services impacts with regard to energy usage, please see Section IV.M.4, Utilities and Services - Energy, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

V. IMPACTS THE EIR FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact areas were concluded by the Draft EIR and the Revised Draft EIR to be less than significant with implementation of the mitigation measures described in the Final EIR. Based on that analysis and other evidence in the administrative record relating to the Proposed Project, the City finds and determines that mitigation measures described in the Final EIR will reduce potentially significant impacts identified for the following environmental impact categories to below the level of significance.

A. AIR QUALITY – CONSTRUCTION – LOCALIZED IMPACTS

1. DESCRIPTION OF EFFECTS

Localized construction emissions are a subset of overall regional construction emissions and consist of those emissions which are only generated at the Project Site. Project-related sources of localized emissions include fugitive dust and equipment exhaust. The Proposed Project's localized construction analysis was conducted in accordance with the methodology and guidelines set forth by the SCAQMD, the regional agency with jurisdiction over air quality conditions within the South Coast Air Basin, which includes the Project Site. Pursuant to the SCAQMD's guidance, localized construction emissions were forecasted for nitrogen oxides (NOx), carbon monoxide (CO), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Based on this analysis, Proposed Project construction would result in less than significant localized air quality impacts with regard to CO, PM_{10}, and $PM_{2.5}$ emissions. Localized impacts with regard to NOx emissions would exceed the significance threshold established by the SCAQMD and thus, Proposed Project localized construction NOx emissions would constitute a significant impact without mitigation.

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions. As described above, Proposed Project construction would result in a significant localized impact with regard NOx emissions. As such, based on the SCAQMD's guidance, the Proposed Project would also have a cumulative significant impact with regard to NOx emissions without the implementation of mitigation measures.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this specific environmental issue.

3. MITIGATION MEASURES

Mitigation Measure B-4: Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications. The contractor shall keep

documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

Mitigation Measure B-5: Contractors shall utilize electricity from power poles and solar generators rather than temporary diesel or gasoline generators if power poles are available at construction area.

Mitigation Measure B-6: Construction parking shall be configured to minimize traffic interference.

Mitigation Measure B-7: Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours.

Mitigation Measure B-9: During plan check, the Proposed Project representative shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of all off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 3 off-road emissions standards for equipment rated at 50 horsepower or greater during the grading, concrete pouring and building construction phases of Proposed Project construction where commercially available. The use of Tier IV equipment shall be considered for use at the Project Site if Tier IV equipment is readily available at the time Proposed Project construction commences.

Mitigation Measure B-10: Contractors shall utilize alternative fueled off-road equipment where possible. The construction contractor shall maintain a daily log of off-road equipment used and whether they utilize alternative fuel. The daily log shall be made available to the Construction Monitor.

Mitigation Measure B-14a: Diesel haul trucks used during Proposed Project construction (e.g., material delivery trucks and soil import/export) shall be 2010 model year or newer. In the event that diesel haul trucks 2010 model year or newer are not available, diesel haul trucks that meet EPA 2007 model year NOx emissions requirements shall be used during Proposed Project construction.

Mitigation Measure B-14b: For off-road construction equipment equal to or greater than 50 horsepower, a copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or SCAQMD operating permit shall be available on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit.

4. FINDINGS

Changes or alterations and mitigation measures have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the potentially significant impacts associated with localized air quality impacts during Proposed Project construction, as identified in the Draft EIR, to less than significant levels.

5. RATIONALE FOR FINDINGS

Proposed Project localized construction emissions would result in less than significant impacts with regard to CO, PM_{10}, and $PM_{2.5}$. Localized construction NOx emissions would exceed the threshold levels established by the SCAQMD and as a result, a significant impact would occur. Implementation of the mitigation measures identified above would reduce localized construction

NOx emission levels, although localized construction NOx emissions would remain in exceedance of the SCAQMD LST screening threshold for this pollutant. Therefore, pursuant to the SCAQMD's LST methodology, detailed dispersion modeling was conducted using the United States Environmental Protection Agency's preferred regulatory Gaussian Plume Air Dispersion Model (AERMOD) to further evaluate potential localized construction NOx impacts. The results of this detailed dispersion modeling indicate that localized construction NOx impacts would be below the SCAQMD localized significance thresholds (LST). As such, the Proposed Project would result in less than significant localized construction impacts with the incorporation of the identified mitigation measures. In addition, actual construction activities would, on average, occur at a somewhat reduced level compared to the maximum construction day which is the basis of the analysis described above and, as such, would have a corresponding reduction in pollutant emissions. As the SCAQMD has determined that individual construction projects that exceed the SCAQMD's recommended thresholds for project-specific impacts would cause a cumulatively considerable impact, Proposed Project localized significant construction impacts would be less than significant since its project-specific impacts would be less than significant.

The potentially significant Proposed Project impacts with respect to localized air quality during Proposed Project construction would be reduced to a less than significant level through the implementation of Mitigation Measures B-4 through B-7, B-9, B-10, B-14a, and B-14b. With the implementation of these mitigation measures, no significant impacts associated with localized air quality during Proposed Project construction are anticipated.

6. REFERENCE

For a complete discussion of air quality impacts, please see Section IV.B, Air Quality, of the Draft EIR and Section III, Corrections and Additions, of the Revised Draft EIR.

B. CULTURAL RESOURCES - HISTORIC RESOURCES

1. DESCRIPTION OF EFFECTS

a) DEMOLITION

Two structures on the Project Site have been identified as being potentially significant historic resources pursuant to CEQA. The former Broadway building appears to be eligible for listing in the National Register of Historic Places and, as such, is eligible for listing in the California Register. The former May Company building was previously determined eligible for the National Register and because of this status, is automatically listed in the California Register. For purposes of CEQA, both buildings are considered historic resources. Proposed Project development would not result in the demolition of either of these two buildings.

b) RELOCATION

The Proposed Project does not involve the relocation of significant historic resources, as the Proposed Project is the revitalization of the Baldwin Hills Crenshaw Plaza. Under the Proposed Project, the Broadway and May Company buildings would be preserved and may be rehabilitated and incorporated into the Proposed Project. Neither building would be relocated under the Proposed Project.

c) INTERNAL CHANGES

Rehabilitation and alteration of the former Broadway and May Company buildings may occur during the development of the Proposed Project. Potential rehabilitation and alteration of these buildings could include both interior and exterior improvements. While it is likely that tenant improvements would occur in the future to the interior of the Broadway and May Company buildings and there are no specific plans for the rehabilitation of the two buildings at this time, it is possible the buildings may be significantly impacted by inappropriate alterations that could further degrade their integrity if alterations are not performed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). Therefore, a potentially significant impact with respect to potential interior changes to the former Broadway and May Company buildings could occur.

d) EXTERIOR CHANGES

Numerous additions have been made to the exterior of the former Broadway and May Company buildings over the decades. These changes included the enclosure of display windows on the exterior of the Broadway building; construction of mall buildings to the south of the Broadway building; demolition of original mall structures to the south of the Broadway building; the construction of an enclosed mall to the southwest of the Broadway building; the construction of the pedestrian bridge across Martin Luther King Jr. Boulevard which obscured both the south façade of the May Company building and the north façade of the Broadway building; various signage changes to reflect the different tenants throughout the years; and the filling of original long display windows on the May Company building above the canopy. Other changes throughout the years include the on-site landscaping, surface and structured parking, as well as the security fence installed in the 1990s. Even with the continuous evolution of the Broadway and May Company buildings in relation to numerous physical changes which have caused the buildings to evolve over time, they still retain their primary use as commercial retail stores and, as such, would be consistent with the Secretary of the Interior's Standards for Rehabilitation which indicate that the historic purpose of the property be retained. While some changes to the exteriors of these two buildings are discussed in the Draft EIR, currently there are no plans to modify the exterior of these buildings as part of the Proposed Project.

Based on information provided by the South Central Coastal Information Center, several historic resources have been identified in the immediate vicinity. Four properties within a 0.5-mile radius of the Project Site are designated as City of Los Angeles Historic Cultural Monuments. With respect to the off-site historic resources, since none of the off-site resources are located immediately adjacent to or within the primary viewshed of the Project Site, no indirect impacts would occur with regard to these resources as a result of the Proposed Project. The redevelopment of the Project Site would thus have no direct or indirect impacts upon these historic resources.

e) CUMULATIVE IMPACTS

It is anticipated that historic resources that are potentially affected by the related projects would also be subject to the same requirements of CEQA as the Proposed Project. Determinations would be made on a case-by-case basis and the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Nevertheless, impacts attributable to related project development could be significant and unavoidable. However, as the Proposed Project would include project-specific mitigation measures to ensure impacts on historic resources would be less than significant, the Proposed Project would not have a cumulatively considerable contribution to a significant cumulative impact with regard to historic resources.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. MITIGATION MEASURES

Mitigation Measure D.1-1: Interior alterations to the two historic resources, the Broadway building and the May Company building, shall comply with the Secretary of the Interior's Standards for the Treatment for Historic Properties.

Mitigation Measure D.1-2: A qualified historic preservation consultant shall monitor the design and construction of the Proposed Project as it relates to historic resources to ensure that it complies with the Secretary of Interior's Standards for the Treatment of Historic Properties. The consultant shall prepare a report at the conclusion of the design and development phase of the Proposed Project analyzing compliance with the Standards. That report shall be submitted to the City of Los Angeles Office of Historic Resources for its review and approval. The consultant shall monitor the construction of the Proposed Project periodically.

4. FINDINGS

Changes or alterations and mitigation measures have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the potentially significant impacts associated with historic resources, as identified in the Draft EIR, to less than significant levels.

5. RATIONALE FOR FINDINGS

Two structures on the Project Site have been identified as being potentially significant historic resources pursuant to CEQA. The former Broadway building appears to be eligible for listing in the National Register of Historic Places and, as such, is eligible for listing in the California Register. The former May Company building was previously determined eligible for the National Register and because of this status, is automatically listed in the California Register. For purposes of CEQA, both buildings are considered historic resources.

The Proposed Project would not demolish, destruct, relocate or alter a historical resource on the Project Site such that the significance of the historical resource would be materially impaired. While there would be demolition of Outbuildings A, C, and E through K, neither the former May Company nor the Broadway buildings would be demolished, and these two buildings are the only potentially significant resources on-site. The Proposed Project would not involve a relocation of a significant historical resource. The Broadway and May Company buildings would be preserved, rehabilitated and incorporated into the Proposed Project, and neither building would be relocated. Exterior modifications to the former Broadway and May Company buildings may occur during the development of the Proposed Project. These modifications are not anticipated to adversely impact historical resources such that the significance of the historical resources would be materially impaired. Future interior tenant improvements could result in interior modifications to the former Broadway and May Company buildings that could degrade the integrity of these buildings if alterations are not performed in accordance with the Standards. Without conformance with the Standards, a significant impact would result. The potentially significant impact with respect to potential interior changes to the former Broadway and May Company buildings would, however, be reduced to a less than significant level through the implementation of Mitigation Measures D.1-1 and D.1-2.

None of the identified off-site historic resources are located immediately adjacent to or within the primary viewshed of the Project Site. As such, the redevelopment of the Project Site under the Proposed Project would thus have no direct or indirect impacts upon these historic resources.

Any significant impacts resulting from the development of the identified related projects would be evaluated on a case-by-case basis with potential impacts to historic resources mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Nevertheless, related project development could result in significant and unavoidable impacts to historic resources. Since Proposed Project impacts would be mitigated to a less than significant level, the Proposed Project would not have a cumulatively considerable contribution to a significant impact, and thus, cumulative impacts would be less than significant.

The potentially significant impact with respect to potential interior changes to the former Broadway and May Company buildings would be reduced to a less than significant level through the implementation of Mitigation Measures D.1-1 and D.1-2. With the implementation of these mitigation measures, no significant impacts associated with historic resources are anticipated.

6. REFERENCE

For a complete discussion of historic resource impacts, please see Section IV.D.1, Cultural Resources – Historic Resources of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

C. CULTURAL RESOURCES - ARCHAEOLOGICAL AND PALEONTOLOGICAL RESOURCES

1. DESCRIPTION OF EFFECTS

a) ARCHAEOLOGICAL RESOURCES

There are two known archaeological resource sites within the Project Site and one City of Los Angeles Historic-Cultural Monument is within 500 feet west of the southern portion of the Project Site. Archaeological site survey records indicate the presence of archaeological remains and artifacts including abalone shells, mollusk shells, chipped stone points, and other unidentified material within the Project Site. Construction activities associated with the Proposed Project would include excavation and grading, and thus could disturb previously undiscovered archaeological resources.

The Proposed Project would not disturb the previously recorded on-site sites or the City of Los Angeles Historic-Cultural Monument located near the Project Site. As such, no impact to these resources would occur. However, because the Proposed Project would include excavation and earthwork activity in other areas across the Project Site, the likelihood of encountering other undiscovered archaeological resources during construction is considered high. Therefore, the Proposed Project would have a potentially significant impact with respect to the uncovering of archaeological resources during construction.

b) PALEONTOLOGICAL RESOURCES

There are no known paleontological sites within the Project Site. Furthermore, the Project Site is not located in an area designated by the City of Los Angeles General Plan Framework Element EIR or the Environmental and Public Facilities Maps of the City of Los Angeles Department of City Planning as a paleontological site or survey area, nor is there any information to indicate whether any potential undiscovered paleontological resource is of

regional or statewide significance. Nevertheless, excavations anticipated for the Proposed Project associated with subterranean parking, foundations, and utilities installation, could create the potential for a significant impact by disturbing any existing, but undiscovered, paleontological resources.

c) CUMULATIVE IMPACTS

Development of the Proposed Project in combination with the related projects would result in the increased potential for encountering archaeological resources in the Project vicinity. It is not known at this time if future development of the related project sites would involve archaeological or paleontological resources. However, similar to the Proposed Project, the related projects would be subject to the requirements of CEQA, and City archeological resource protection ordinances. As such, the related projects would be evaluated on a case-by-case basis and any potential impacts to archeological and paleontological resources would be addressed at that time. Nevertheless, while considered remote, impacts attributable to the development of the related projects with regard to archaeological and paleontological resources is conservatively determined to be significant and unavoidable.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. MITIGATION MEASURES

Mitigation Measure D.2-1: A covenant and agreement between the Project Applicant and the City of Los Angeles shall be recorded prior to obtaining a grading permit stating that if any archaeological materials are encountered during the course of Project development, construction shall be halted, as set forth in California Public Resources Code Section 21083.2.

Archaeological monitoring shall be implemented during Proposed Project construction. Monitoring shall be conducted by a qualified archaeological monitor who is working under the direct supervision of a Project Manager or Principal Investigator certified by the Register of Professional Archaeologists (RPA). A pre-construction information and safety meeting shall be held to make construction personnel aware of archaeological monitoring procedures and the types of archaeological resources that might be encountered.

The services of an archaeologist shall be secured by contacting the Center for Public Archaeology—Cal State University Fullerton, a member of the Register of Professional Archaeologists (RPA), or an RPA-qualified archaeologist to assess the resources, evaluate the potential impact (if any), and prescribe an appropriate method for preserving the resource either by removing the resource from where it is found or by documenting the resource before construction may again commence. Copies of the archaeological survey, study, or report shall be submitted to the South Central Coastal Information Center (SCCIC), located at the Cal State University Fullerton Department of Anthropology.

Mitigation Measure D.2-2: A covenant and agreement between the Project Applicant and the City of Los Angeles shall be recorded prior to obtaining a grading permit stating that if any paleontological materials are encountered during the course of Project development, construction shall be halted, as set forth in California Public Resources Code Section 21083.2. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology—USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Natural History Museum of Los Angeles County to assess the resources, evaluate the potential impact (if any), and prescribe an appropriate method for preserving the resource either by removing the

resource from where it is found or by documenting the resource found before construction may again commence. Copies of the paleontological survey, study, or report shall be submitted to the Natural History Museum of Los Angeles County.

4. FINDINGS

Changes or alterations and mitigation measures have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the potentially significant impacts associated with archaeological and paleontological resources, as identified in the Draft EIR, to less than significant levels.

5. RATIONALE FOR FINDINGS

The presence of known archaeological resources within the Project Site as well as within proximity of the Project Site indicates that the likelihood of encountering other undiscovered archaeological resources at the Project Site is considered high. Thus, construction activities associated with the Proposed Project, which include excavation and grading, could disturb previously undiscovered archaeological resources.

No known paleontological sites are known to occur within the Project Site and the Project Site is not located in an area designated by the City of Los Angeles as a paleontological site or survey area. As such, it is not expected that the Proposed Project would result in the permanent loss of, or loss of access to, a paleontological resource. Nevertheless, excavations anticipated to occur under the Proposed Project would be those associated with subterranean parking, foundations, and utilities installation, thereby creating the potential for a significant impact by disturbing any existing, but undiscovered, paleontological resources.

Each related project would be evaluated by the City and any potential impacts to archeological and paleontological resources would be addressed at that time. While considered remote, impacts to archaeological and paleontological resources associated with the development of the related projects could be determined to be significant and unavoidable. However, as the Proposed Project would include a mitigation measures to ensure impacts on archeological and paleontological resources would be less than significant, the Proposed Project would not have a cumulatively considerable contribution to a significant impact, and thus, cumulative impacts would be less than significant.

The potentially significant Proposed Project impacts with respect to archaeological and paleontological resources would be reduced to a less than significant level through the implementation of Mitigation Measures D.2-1 and D.2-2. With the implementation of these mitigation measures, no significant impacts associated with archaeological and paleontological resources are anticipated.

6. REFERENCE

For a complete discussion of archaeological and paleontological resource impacts, please see Section IV.D.2, Cultural Resources – Archaeological and Paleontological Resources of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

D. UTILITIES AND SERVICES – WATER SUPPLY

1. DESCRIPTION OF EFFECTS

a) WATER SUPPLY

The Proposed Project's net potable water demand is estimated by to be approximately 247,147 gallons per day (gpd) and 278.75 acre-feet per year. This estimate takes into consideration the water conservation measures that would be implemented for the Proposed Project, which would reduce the potable water demand of the Proposed Project by approximately 77.71 acre-feet per year, or approximately 15 percent from the amount that would otherwise be required by the Proposed Project. The Proposed Project's annual water demand falls within the City's Urban Water Management Plan's (UWMP) projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 and falls within the UWMP's 25-year water demand growth projection. Therefore, the Proposed Project is consistent with the City's 2005 UWMP. This conclusion is based on the information presented within the Proposed Project's Water Supply Assessment (WSA), which was adopted by the Los Angeles Board of Water and Power Commissioners on October 20, 2009. The Proposed Project's development program presented in the Draft EIR included minor changes to the development program that formed the basis of the Proposed Project's WSA. LADWP staff determined on April 29, 2014 that the current development program for the Proposed Project results in an overall reduction in water demand, and does not exceed the prior approved WSA's net increase in water consumption and that no additional water supply assessment is required for the current development program for the Proposed Project per section 10910(h)(1) of the California Water Code.

b) CUMULATIVE IMPACTS

In terms of the City's overall water supply, the water demands for projects that are consistent with the City's General Plan have been taken into account in the 2005 UWMP. For projects that are not consistent with the General Plan or that meet the requirements established in Sections 10910–10915 of the State Water Code, a WSA demonstrating sufficient water availability exists to serve the project would be required on a project-by-project basis. It is anticipated that the projected water supplies during normal, single-dry, and multiple-dry water years as included in the 20-year projection contained in the City's UWMP will meet the expected water demands associated with the Proposed Project in addition to the demands of current and future related projects.

2. PROJECT DESIGN FEATURES

The following Project Design Feature is relevant to water supply:

PDF M.2-1: All on-site landscaping would be designed to reduce water use through the use of water-efficient landscaping features and drought-tolerant plant species.

3. MITIGATION MEASURES

Mitigation Measure M.2-1: Develop the Project with cooling towers that provide a minimum of 5.5 cycles of concentration, as applicable;

Mitigation Measure M.2-2: Install high-efficiency toilets (i.e., 1.28 gallons per flush or less, includes dual flush);

Mitigation Measure M.2-3: Install high-efficiency urinals (i.e., 0.5 gallon per flush or less, includes waterless);

Mitigation Measure M.2-4: Install faucets with self-closing fixtures providing a flow rate of 0.5 gallon per minute or less in all public restrooms;

Mitigation Measure M.2-5: Install residential kitchen and restroom faucets with a flow rate of 1.5 gallons per minute or less;

Mitigation Measure M.2-6: Install low-flow residential showerheads with a flow rate of 2.0 gallons per minute or less and no more than one showerhead per stall;

Mitigation Measure M.2-7: Install high-efficiency community clothes washers with a water factor of 5.0 or less;

Mitigation Measure M.2-8: Install high-efficiency residential dishwashers;

Mitigation Measure M.2-9: Integrate domestic water heating systems located in close proximity to the point of use (as feasible);

Mitigation Measure M.2-10: Provide individual metering and billing for water use in all dwelling units and commercial uses where feasible;

Mitigation Measure M.2-11: Utilize efficient irrigation systems that include weather-based irrigation controllers with rain and wind shutoff;

Mitigation Measure M.2-12: Use native and drought tolerant plant materials in the landscape plan with 50 percent of landscape area (square feet) and plant count; and

Mitigation Measure M.2-13: Provide separate metering or sub-metering for irrigated landscapes of 5,000 square feet or more.

4. FINDINGS

Incorporation of Project Design Feature PDF M.2-1 would reduce the Proposed Project's demand for potable water. In addition, changes or alterations and mitigation measures have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the potentially significant impacts associated with water supplies, as identified in the Draft EIR, to less than significant levels.

5. RATIONALE FOR FINDINGS

The Los Angeles Board of Water and Power Commissioners adopted the Proposed Project's WSA on October 20, 2009 which concluded that the Proposed Project's annual water demand falls within the UWMP projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 and falls within the UWMP's 25-year water demand growth projection. Therefore, the Proposed Project is consistent with the City's 2005 UWMP. In addition, LADWP staff has determined that the current development program for the Proposed Project results in an overall reduction in water demand, compared to that covered by the 2009 WSA and, as such, does not exceed the prior approved WSA's net increase in water consumption and that no additional water supply assessment is required per section 10910(h)(1) of the California Water Code. It is also anticipated that the projected water supplies during normal, single-dry, and multiple-dry water years as included in the 20-year projection contained in the City's UWMP will

meet the expected water demands associated with the proposed Project in addition to the demands of current and future related projects. These conclusions are predicated on implementation of the Proposed Project's project design feature and mitigation measures, which reduce the Proposed Project's potable water demand.

The water conservation measures that are identified above as mitigation measures were incorporated into the Proposed Project's WSA. As such, the determination that adequate water supplies are available is predicated upon the implementation of Mitigation Measures M.2-1 through M.2-13. Thus, Proposed Project water supply impacts are less than significant with the implementation of Mitigation Measures M.2-1 through M.2-13.

6. REFERENCE

For a complete discussion of water supply impacts, please see Section IV.M.2, Utilities and Services – Water Supply, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

E. UTILITIES AND SERVICES – SOLID WASTE

1. DESCRIPTION OF EFFECTS

a) CONSTRUCTION

Construction of the Proposed Project would require demolition of Outbuildings A, C, and E through K and existing on-site parking facilities as well as excavation and construction of the new buildings on the Project Site. Each of these activities would generate demolition waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in the Los Angeles County's inert landfill site (Azusa Land Reclamation) or one of several inert debris engineered fill operations that are located throughout Los Angeles County.

Pursuant to the Waste Hauler Permit Program, all construction and demolition ("C&D") waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution. The City-certified waste processing facilities recycle amounts varying from 70 percent to 94 percent of the waste stream. The project is committed to achieving a 75 percent reduction to the amount of solid waste that would be generated during the construction period via a waste diversion plan that would be implemented during the construction process. Assuming a minimum 75 percent reduction is achieved by these efforts, the amount of solid waste generated by the Proposed Project that would be disposed of in area landfills would be approximately 2,915 tons or approximately 486 tons per year. The daily construction waste that would end up in any particular landfill would vary depending on daily and weekly demolition and construction schedules. As discussed in the EIR, the Los Angeles County's inert landfills would have adequate capacity to accommodate Proposed Project generated construction waste.

b) OPERATIONS

The Proposed Project includes the development of 821,715 square feet of net new commercial floor area and 961 residential units. The net solid waste generation of the Proposed Project, absent mitigation, would be approximately 13.7 tons per day and 5,002 tons per year. This increase in disposal would represent an approximate 0.16 percent increase in the City's annual solid waste disposal quantity based on the 2012 disposal rate of approximately 3.083 million tons. Project-generated solid waste would be collected by a private solid waste hauler and

taken for disposal at one of the Los Angeles County's Class III landfills open to the City of Los Angeles. Los Angeles County evaluates and updates the remaining landfill capacity and landfill disposal needs in the 2012 Los Angeles County Integrated Waste Management Plan ("ColWMP") Annual Report. As described in the ColWMP 2012 Annual Report, future disposal needs over the next 15-year planning horizon (2027) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. Nonetheless, while it is anticipated that future iterations of the ColWMP Annual Reports would provide for improvements beyond 2027 to serve future waste disposal needs, because the long-term solid waste needs necessary to serve the Proposed Project beyond 2027 have not been resolved, the Proposed Project's long-term impact on solid waste facilities, absent mitigation, could be considered significant and unavoidable.

c) CUMULATIVE IMPACTS

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The State requires that the ColWMP show the provision of a minimum of 15-years of combined disposal capacity through existing or planned solid waste disposal and transformation facilities, or through additional strategies. Projected growth is included in the analysis, and the required Annual Report updates the disposal demand and supply each year. The County's 2012 Annual Report anticipates an 11.4 percent increase in population growth within the County of Los Angeles by 2027 and an increase of 16.4 percent in employment.

The cumulative development in the project area would contribute an increment of the overall projected demand for waste disposal. There are 39 related projects located in the vicinity of the Project Site that would contribute to the demand for solid waste disposal. The cumulative annual solid waste generation (Proposed Project plus related projects), not accounting for diversion, would be a negligible increment to the County's annual waste generation. Future disposal needs over the next 15-year planning horizon (2027) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years.

2. PROJECT DESIGN FEATURES

The following Project Design Feature is relevant to solid waste:

PDF M.3-1: The construction contractor shall only contract for waste disposal services with a company that recycles construction-related solid waste (i.e., debris generated during Project demolition and construction). The construction contractor shall also ensure that a minimum of 75 percent of the construction-related solid waste is recycled and diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished either through the on-site separation of materials or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 75 percent.

3. MITIGATION MEASURES

Mitigation Measure M.3-1: The Project Applicant shall develop a construction and demolition debris recycling program to divert construction-related solid waste from area landfills.

Mitigation Measure M.3-2: The construction contractor shall only contract for waste disposal services with a company that recycles construction-related wastes.

Mitigation Measure M.3-3: To facilitate the on-site separation and recycling of construction-related waste, the construction contractor shall provide temporary waste separation bins on site during construction.

Mitigation Measure M.3-4: The Project Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the Project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

Mitigation Measure M.3-5: Each residence shall receive educational materials on the proper management and disposal of hazardous waste. Such materials shall provide information on how to recycle household hazardous wastes and electronic waste materials and provide information on City-sponsored hazardous waste materials drop-off events.

4. FINDINGS

Incorporation of Project Design Feature PDF M.3-1 would reduce the solid waste generated by the Proposed Project. In addition, changes or alterations and mitigation measures have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the potentially significant impacts associated with Proposed Project's solid waste generation, as identified in the Draft EIR, to less than significant levels.

5. RATIONALE FOR FINDINGS

The Proposed Project would generate construction debris due to the demolition of Outbuildings A, C, and E through K, parking lot paving, excavation, and construction of new buildings. Construction and demolition waste would be disposed of at an inert disposal facility, which has sufficient capacity. Therefore, construction impacts on solid waste would be less than significant. Implementation of PDF M.3-1 and Mitigation Measures M.3-1 through M.3-3 would reduce this less than significant impact. No mitigation is required.

The Proposed Project would generate solid waste as the result of operation of the commercial and retail uses that would occur on the Project Site. The Proposed Project would comply with City requirements regarding waste, such as the provision of space for recycling. With the City and County's ongoing efforts to reduce the amount of waste disposed of at Class III landfills, the Proposed Project would not exceed the permitted capacity of the facilities serving the Proposed Project through 2027. Nonetheless, while it is anticipated that future iterations of the ColWMP Annual Reports would provide for improvements beyond 2027 to serve future waste disposal needs, because the long-term solid waste needs necessary to serve the Proposed Project beyond 2027 have not been resolved, the Proposed Project's long-term impact on solid waste facilities would be considered significant and unavoidable. Implementation of Mitigation Measures M.3.4 and M.3.5 will reduce the anticipated solid waste generated by the Proposed Project, leading to a solid waste generation increase of less than 0.16 percent to the City's annual solid waste disposal of approximately 3.083 million tons (based on the 2012 disposal rate).

Cumulative development in the Project vicinity would contribute an increment of the overall projected demand for waste disposal. The cumulative annual solid waste generation, not accounting for diversion, would be a negligible increment to the County's annual waste generation. Future disposal needs would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would carried out over the years. Therefore, as discussed further in the EIR, cumulative development would not alter the County's ability to address landfill needs via existing capacity and other options for increasing capacity.

Therefore, impacts to the solid waste system from cumulative development would be less than significant and thus, the Proposed Project would not contribute to a cumulatively significant solid waste impact. No mitigation is required.

The potentially significant Proposed Project impacts with respect to solid waste would be reduced to a less than significant level through the implementation of Mitigation Measures M.3-4 and M.3-5. With the implementation of these mitigation measures, no significant impacts associated with solid waste are anticipated as a result of the Proposed Project.

6. REFERENCE

For a complete discussion of solid waste impacts, please see Section IV.M.3, Utilities and Services – Solid Waste, of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

F. TRANSPORTATION AND CIRCULATION – TRANSIT AND PARKING

1. DESCRIPTION OF EFFECTS

a) TRANSIT

The Project Site is located in a multi-modal transportation center. Two transit providers, Metro and Los Angeles Department of Transportation (LADOT) DASH, provide bus service near and to the Project Site. The Metro bus system provides 27 bus lines in the Project vicinity, whereas the LADOT DASH system provides 3 local bus lines in the area. Metro is also currently constructing the Crenshaw/LAX light rail line, which would include a station adjacent to the Project Site scheduled to open in 2019.

The Proposed Project is forecasted to generate approximately 4,056 daily transit trips, including 287 morning peak-hour trips and 393 afternoon peak-hour trips. The Proposed Project proposes several methods to promote alternative modes of travel to and from the Project Site, including carpooling, transit usage (including, but not limited to, connections to the proposed Crenshaw/LAX light rail line station adjacent to the Project Site), bicycling, and walking. The Proposed Project will also construct a mobility hub on the Project Site which would serve to enhance mobility connectivity, including providing bicycle storage, shuttle services, vehicle sharing programs, and having proximity to transit service.

There are a total of seven Metro bus lines and three LADOT Dash lines operating along the periphery of the Proposed Project. Based on the average load factors in the morning and afternoon peak hours in the Proposed Project vicinity (developed from existing ridership data for the Metro lines serving the Project Site), it was determined that there is residual capacity on the existing transit system on all major transit lines serving the Project Site. Assuming that the maximum load on the existing transit lines increase at the ambient growth rate of 0.5 percent per year, the residual capacity on the existing transit system in 2020 without the Proposed Project is expected to be 419 in the morning peak hour and 547 in the afternoon peak hour. The Proposed Project, as a mitigation measure, would provide an additional bus with a seating capacity of 40 and a standing capacity of 50 to supplement the current Metro bus service in the Project area. Accounting for the transit trips generated by the Proposed Project and the additional bus that would be provided with implementation of the Proposed Project's mitigation measure, the residual capacity on the bus system in 2020 with the Proposed Project is forecasted to be 182 in the morning peak hour and 204 in the afternoon peak hour. Therefore, the anticipated transit demand from the Proposed Project on a system wide basis would be met and a less than significant impact to the regional transit system would occur. These forecasts of

additional bus trips are conservative in that it is likely that some of these trips may occur via the Crenshaw/LAX light rail line once the proposed station adjacent to the Project Site is open for service, which is currently scheduled to occur in 2019.

b) PARKING

The Proposed Project, including existing on-site uses, would require a total of 1,968 parking spaces for residential uses and 4,615 spaces for commercial uses. The Proposed Project would provide a total of 6,829 parking spaces, including 4,829 spaces for the commercial land uses on the Project Site and 2,000 spaces for the residential land uses. The North Area of the Project Site would contain 1,059 commercial parking spaces and 1,726 residential parking spaces for a total of 2,785 spaces. This parking would be provided primarily at- and above-grade through a new parking structure located within the northwest corner of the Project Site. The South Area of the Project Site would provide 3,770 commercial parking spaces and 274 residential parking spaces for a total of 4,044 spaces. The existing parking deck in the South Area would be retained as an open-air structure and in a new structure would be built at the south end of the Project Site. Another existing parking structure would be modified to connect to the proposed retail anchor at the southeast corner of Martin Luther King Jr. Boulevard and Marlton Avenue. The proposed parking supply of 2,000 residential spaces and 4,550 commercial spaces would meet the LAMC parking requirements as well as the requirements set forth in the Advisory Agency Parking Policy for the Proposed Project's residential and commercial uses.

While the parking requirements of the LAMC as well as the requirements set forth in the Advisory Agency Parking Policy are met for the Proposed Project's residential and commercial uses, the Proposed Project's parking requirements are not necessarily reflective of the parking demand generated by the Proposed Project's commercial land uses; that is, the parking requirements may not be the same as the actual peak parking demand. The forecasted peak commercial parking demand on a weekend in June of 4,476 spaces, which represents a typical month, would be accommodated by the proposed 4,829 spaces on the Project Site. Therefore, in a typical month, the Proposed Project's parking demand would be satisfied. The peak parking demand in the peak month of the year, December, is higher than the proposed supply. On a weekday in December, the peak parking demand is estimated to be 5,551 spaces, 722 spaces greater than the parking supply. On a Saturday in December, the peak parking demand is estimated to be 5,677 spaces, 848 spaces greater than the parking supply. Thus, the proposed commercial parking supply of 4,829 spaces is adequate to satisfy the peak parking demand every month of the year except during the holiday shopping season in late November and all of December. This shortfall in parking is a significant impact. To address this significant impact, the Proposed Project would institute an operational parking program during the holiday shopping season in late November and all of December to ensure that the level of demand for commercial parking spaces can be adequately accommodated.

c) CUMULATIVE IMPACTS

Implementation of the Proposed Project in conjunction with cumulative conditions would increase the demand for transit in the Project area. As the Proposed Project's transit impact would be less than significant with the proposed mitigation measures, the Proposed Project's impact would not be cumulatively considerable and the Proposed Project's cumulative transit impacts would be less than significant. The parking demand associated with the Proposed Project would not contribute to the cumulative demand for parking in the Project area. With the Proposed Project's mitigation measures, the amount of parking provided by the Proposed Project would meet the peak parking demand every month of the year. As such, less than significant parking impacts related to the Proposed Project would occur. The degree to which

the related projects meet applicable parking requirements and parking demands would be determined on a case-by-case basis. Because the Proposed Project would provide sufficient parking, there would not be the potential to contribute to any potential parking shortages associated with the related projects. Therefore, cumulative parking impacts would be less than significant as a result of the Proposed Project.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for this environmental issue.

3. MITIGATION MEASURES

The following mitigation measures would reduce Proposed Project transit impacts.

Mitigation Measure L-1: The Proposed Project shall purchase one new bus for Metro route 210. The Proposed Project shall also pay for total operations and maintenance costs for the new bus during weekday peak hours (7:00 A.M. to 10:00 A.M. and 3:00 P.M. to 6:00 P.M.) and during Saturday midday peak hours (12:00 P.M. to 2:00 P.M.) for the first three years. To ensure continued operations, the Proposed Project shall pay for the unsubsidized portion of these costs for an additional seven years. Farebox revenues and State/federal transit subsidies shall be credited against O&M costs for years one through ten. The buses may be deployed to another route or location within the Study Area if determined by Metro to serve a greater need.

Mitigation Measure L-2: The Proposed Project shall allocate space for, and fund, a mobility hub on, the Project Site.
The following mitigation measure would reduce Proposed Project parking impacts.

Mitigation Measure L-7: The Project will institute an operational parking program that will include one or more of the following mitigation measures as necessary:

- Identification of one or more areas of on-site parking where tandem parking will be operated on a temporary basis with attendant parking for employees.
- Operation of valet parking for customers with tandem parking in certain areas.
- Use of off-site parking for employees with a shuttle van to and from the Project Site.
- A program to encourage employees to rideshare and/or use transit during the peak month of December.

4. FINDINGS

Changes or alterations and mitigation measures have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the potentially significant impacts associated with transit and parking, as identified in the Draft EIR, to less than significant levels.

5. RATIONALE FOR FINDINGS

The Project Site and vicinity is currently served by an extensive transit network consisting of 27 bus lines operated by Metro and 3 bus lines that are part of the LADOT DASH system. This existing transit network will be substantively expanded with the opening of the Metro Crenshaw/LAX Line that will provide direct access to Los Angeles International Airport (LAX) as

well as direct connections to the Metro Expo and Green light rail lines which would enable easy transit travel throughout the Metro light rail system. The Metro Crenshaw/LAX Line includes a station under construction that is adjacent to the Project Site and will be directly accessible from the Proposed Project, further enhancing the Project Site's transit accessibility. The Proposed Project, in addition to being adjacent to the Crenshaw/LAX light rail line, proposes several methods to promote alternative modes of travel to and from the Project Site, including carpooling, transit usage, bicycling, and walking. The Proposed Project will also construct a mobility hub on the Project Site, which would serve to enhance mobility, including providing bicycle storage, shuttle services, vehicle sharing programs, and having proximity to transit service. The Proposed Project is forecasted to generate approximately 4,056 daily transit trips, including 287 morning peak-hour trips and 393 afternoon peak-hour trips. The existing available bus capacity, which would be augmented with the additional bus that would be provided with implementation of the Proposed Project's mitigation measure, would met the demand generated by the Proposed Project with a residual system-wide capacity on the bus system of 182 in the morning peak hour and 204 in the afternoon peak hour. Thus, the Proposed Project, with mitigation, would result in a less than significant impact on the transit system. These forecasts of additional bus trips are conservative in that it is likely that some of these trips may occur via the Crenshaw/LAX light rail line once the station under construction adjacent to the Project Site is open for service, which is currently scheduled to occur in 2019.

The Proposed Project, including existing on-site uses, would require a total of 1,968 parking spaces for the Proposed Project's residential uses and 4,615 spaces for commercial uses based on the parking requirements set forth in the LAMC and the Advisory Agency Parking Policy. The Proposed Project would provide a total of 6,829 parking spaces, including 4,829 spaces for the commercial land uses on the Project Site and 2,000 spaces for the residential land uses. Thus, the Proposed Project's parking supply would meet the LAMC parking requirements as well as the requirements set forth in the Advisory Agency Parking Policy for the Proposed Project's residential and commercial uses. Notwithstanding, the Proposed Project's commercial parking demand would exceed the available on-site parking supply during the holiday shopping season in late November and all of December. This shortfall in parking to meet the Proposed Project's peak commercial parking demand is a significant impact. However, with the establishment of an operational parking program during the holiday shopping season in late November and all of December (Mitigation Measure L-7), this significant impact is reduced to a less than significant level.

The Proposed Project's cumulative transit impacts would not be cumulatively considerable, and as such, the Proposed Project's transit impacts would be less than significant. The parking demand associated with the Proposed Project would not contribute to the cumulative demand for parking in the Project area. As mitigation has been identified that reduces the Proposed Project's parking demand impacts to a less than significant level, the Project's cumulative parking impacts would be less than significant.

The potentially significant Proposed Project impacts with respect to parking would be reduced to a less than significant level through the implementation of Mitigation Measure L-7. With the implementation of this mitigation measure, no significant impacts associated with parking are anticipated as a result of the Proposed Project.

6. REFERENCE

For a complete discussion of transportation and circulation impacts, please see Section IV.L, Transportation and Circulation of the Draft EIR; and (3) Section III, Corrections and Additions, of the Revised Draft EIR.

VI. IMPACTS THE EIR FOUND TO BE SIGNIFICANT AND UNAVOIDABLE AFTER MITIGATION

The following impact areas were concluded by the Draft EIR and the Revised Draft EIR to be significant and unavoidable with the implementation of the mitigation measures described in the Final EIR. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of a public agency allows the occurrence of unavoidable significant impacts, the agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. Specifically, pursuant to CEQA Guidelines Section 15093(b), the decision maker must adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant unavoidable adverse environmental effects would occur. As the Proposed Project would result in significant unavoidable impacts, a Statement of Overriding Considerations that addresses these impacts is presented in Section XII, Statement of Overriding Considerations, of these Findings.

A. AIR QUALITY – REGIONAL EMISSIONS DURING CONSTRUCTION, OPERATION, AND CONCURRENT CONSTRUCTION AND OPERATION

1. DESCRIPTION OF EFFECTS

a) REGIONAL CONSTRUCTION EMISSIONS

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. The forecast of regional construction emissions includes emission levels of the following six criteria pollutants: carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOC), sulfur oxides (SOx), respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). Criteria pollutants are those pollutants for which state and federal ambient air quality standards have been established. All other air pollutants are classified as toxic air contaminants (TACs).

Regional construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The forecast of Proposed Project regional construction emissions is based on conservative assumptions wherein a relatively large amount of on-site construction is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions during those periods when lesser amounts of Proposed Project construction are occurring would be proportionately lower. Peak regional construction emissions would also be reduced if construction occurs over a longer time period than what has been forecasted, and/or more modern and cleaner-burning construction equipment is used. All construction projects within the South Coast Air Basin, which includes the Project Site, must comply with SCAQMD Rule 403 with regard to fugitive dust emissions. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce PM_{10} and $PM_{2.5}$ emissions associated with construction activities by approximately 61 percent. The maximum daily regional construction emissions for the Proposed Project would result in regional VOC and NOx emissions that exceed the SCAQMD's significance thresholds.[5] Proposed Project regional

[5] The SCAQMD's significance thresholds are used by the City for assessing the significance of a project's air quality impacts.

construction emissions for these two pollutants would, therefore, result in a significant impact without mitigation. Regional CO, SOx, PM_{10}, and $PM_{2.5}$ construction emissions would not exceed the SCAQMD's significance thresholds, and thus, regional construction emission impacts with regard to these four criteria pollutants are less than significant.

b) REGIONAL OPERATION EMISSIONS

Regional air pollutant emissions associated with Proposed Project operations would primarily be generated by the operation of on-road vehicles and by the consumption of natural gas. Air emissions are classified as either mobile sources, area sources, or stationary sources. Mobile source emissions would be generated by the increase in motor vehicle trips to and from the Project Site associated with travel by employees, residents, patrons, guests, and service vehicles. Area source emissions are generated by natural gas consumption for space and water heating, maintenance equipment, and consumer products that contain solvents. Landscaping maintenance that uses fuel-powered outdoor equipment is also considered an area source. Stationary sources include the generation of electricity to support the Proposed Project as well as on-site emergency generators and the use of charbroilers within restaurants.

Regional operational emissions for the Proposed Project at build out would result in VOC, NOx, and CO emissions that exceed the SCAQMD's significance thresholds. Proposed Project regional operational emissions for these three pollutants would, therefore, result in a significant impact without mitigation. Regional operational emissions of SOx, PM_{10}, and $PM_{2.5}$ would not exceed the SCAQMD's significance thresholds, and thus, regional operational emission impacts with regard to these three criteria pollutants are less than significant.

c) REGIONAL CONCURRENT CONSTRUCTION AND OPERATION EMISSIONS

Construction of portions of the Proposed Project would be completed and occupied while construction of the later phases would be ongoing. Therefore, concurrent construction and operational impacts were evaluated. Based on a review of the components that comprise the Proposed Project, it was determined that the maximum concurrent regional emissions could potentially occur if construction of the office building in the North Area of the Project Site occurs last and the remainder of Proposed Project development would be operational. Based on this combination of Proposed Project construction and operations, concurrent construction and operational regional emissions of VOC, NOx, and CO would exceed both construction and operational significance thresholds and would, therefore, result in a significant impact without mitigation. Regional concurrent construction and operational emissions of SOx, PM_{10}, and $PM_{2.5}$ would not exceed the SCAQMD's significance thresholds, and thus, regional concurrent construction and operational emissions with regard to these 3 criteria pollutants are less than significant.

d) CUMULATIVE IMPACTS

According to the SCAQMD, development projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions. As such, regional emissions of VOC and NOx would be significant on a cumulative basis during Proposed Project construction, operations, and during concurrent construction and operations. Regional operational emissions of CO would also result in a significant cumulative impact during Proposed Project operations as well as during concurrent construction and operations, but a less than significant cumulative impact with regard to regional construction emissions. Lastly, regional emissions of SOx, PM_{10}, and $PM_{2.5}$ would be less than

significant on a cumulative basis during construction, operations, and concurrent construction and operations.

2. PROJECT DESIGN FEATURES

There are no Project Design Features for these environmental issues.

3. MITIGATION MEASURES

The following mitigation measures reduce the Proposed Project's regional construction emissions:

Mitigation Measure B-1: All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

Mitigation Measure B-2: Heavy-duty equipment operations shall be suspended during first and second stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

Mitigation Measure B-3: Ground cover in disturbed areas shall be replaced as quickly as possible.

Mitigation Measure B-4: Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

Mitigation Measure B-5: Contractors shall utilize electricity from power poles and solar generators rather than temporary diesel or gasoline generators if power poles are available at construction area.

Mitigation Measure B-6: Construction parking shall be configured to minimize traffic interference.

Mitigation Measure B-7: Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours.

Mitigation Measure B-8: Spray equipment with high transfer efficiency, such as the electrostatic spray gun or manual coatings application (e.g., paint brush and hand roller), shall be used to reduce VOC emissions, to the maximum extent feasible. Construction contractor shall maintain a daily log of the spray equipment. The daily log shall be made available to the Construction Monitor.

Mitigation Measure B-9: During plan check, the Proposed Project representative shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of all off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 3 off-road emissions standards for equipment rated at 50 horsepower or greater during the grading, concrete pouring and building construction phases of Proposed Project construction where commercially available. The use of Tier IV equipment shall be considered for use at the Project Site if Tier IV equipment is readily available at the time Proposed Project construction commences.

Mitigation Measure B-10: Contractors shall utilize alternative fueled off-road equipment where possible. The construction contractor shall maintain a daily log of off-road equipment used and whether they utilize alternative fuel. The daily log shall be made available to the Construction Monitor.

Mitigation Measure B-11: Contractors shall provide temporary traffic controls, such as a flag person, during all phases of construction to maintain smooth traffic flows.

Mitigation Measure B-12: Contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

Mitigation Measure B-13: Contractors shall route construction trucks away from congested streets and sensitive receptor areas.

Mitigation Measure B-14: To the extent commercially available, buildings shall be constructed using no-VOC paints and pre-fabricated products. The construction contractor shall maintain a daily log of the types of paints and products used. The daily log shall be made available to the Construction Monitor.

Mitigation Measure B-14a: Diesel haul trucks used during Proposed Project construction (e.g., material delivery trucks and soil import/export) shall be 2010 model year or newer. In the event that diesel haul trucks 2010 model year or newer are not available, diesel haul trucks that meet EPA 2007 model year NOx emissions requirements shall be used during Proposed Project construction.

Mitigation Measure B-14b: For off-road construction equipment equal to or greater than 50 horsepower, a copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or SCAQMD operating permit shall be available on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit.

Mitigation Measure B-14c: Construction contractors supplying heavy duty diesel equipment rated at 50 horsepower or greater shall be encouraged to apply for AQMD SOON funds. Information including the AQMD website shall be provided to each contractor which uses heavy duty diesel equipment for on-site construction activities.
The following mitigation measures reduce the Proposed Project's regional operation emissions:

Mitigation Measure B-15: The Applicant shall provide informational signs throughout the Project Site identifying nearby public transportation options.

Mitigation Measure B-16: Preferred parking shall be established for alternatively-fueled vehicles.

Mitigation Measure B-17: The Proposed Project shall include at least twenty percent (20%) of the total Code-required net new parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE) or alternative fuel. Plans shall indicate the proposed type and location(s) of EVSE or comparable vehicle charging systems and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Of the 20% EV Ready or alternative fuel, five (5)% of the total Code-required

net new parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the 20% or 5% results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Mitigation Measure B-18: Equipment used during operations (e.g., forklifts and carts) shall use alternative power or solar generators (e.g., electricity or propane) instead of diesel fuels).

Mitigation Measure B-19: Delivery trucks shall be prohibited from idling in excess of 5 minutes. Signs shall be placed in loading dock areas to serve to enforce the idling prohibition.

Mitigation Measure B-20: The Applicant shall install automatic lighting on/off controls and energy-efficient lighting.

Mitigation Measure B-21: The Applicant shall install energy efficient cooling systems and controls per Title 24 requirements.

Mitigation Measure B-22: The Applicant shall provide tenants with a description of the Project's sustainable design and construction features.

Mitigation Measure B-23: The Applicant shall install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

Mitigation Measure B-24: The Applicant shall provide bicycle parking spaces in accordance with LAMC requirements, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations throughout the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

Mitigation Measure B-25: The Applicant shall require by contract specifications that electrical outlets are included in the building design of the loading docks to allow use by refrigerated delivery trucks. If loading and/or unloading of perishable goods would occur for more than 5 minutes, and continual refrigeration is required, all refrigerated delivery trucks shall use the electrical outlets to continue powering the truck refrigeration units when the delivery truck engine is turned off.

The mitigation measures presented above would also reduce the Proposed Project's concurrent regional construction and operational emissions.

4. FINDINGS

In consideration of impacts identified in the EIR, the Lead Agency considered all feasible mitigation to reduce impacts to less than significant levels. However, despite consideration of all possible mitigation, the project nevertheless result in significant impacts to Air Quality – Regional Emissions During Construction, Operation, and Concurrent Construction and Operation.

Changes or alterations including project design features and mitigation measures have been required in, or incorporated into, the Proposed Project which reduce the Proposed Project's significant impacts with regard to regional construction emissions, regional operation emissions, and concurrent regional construction and operation emissions, as identified in the EIR. While such measures would reduce these impacts, the Proposed Project would result in Project-specific and cumulative regional construction emissions, regional operation emissions, and concurrent regional construction and operation emissions that are above the relevant thresholds with adoption of the mitigation measures, and therefore, Proposed Project impacts with regard to regional emissions during construction, operations, and concurrent construction and operations would be significant and unavoidable.

Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Proposed Project alternative (No Project Alternative) identified in the Final EIR that would avoid these impacts since that alternative would not satisfy any of the Project objectives nor provide any of the Project benefits, as explained in more detail below in Section IX of these Findings.

5. RATIONALE FOR FINDINGS

Regional emissions would occur during Proposed Project construction and operations, as well as during the period of time when construction is still occurring while portions of the Proposed Project would be operational. Regional emissions during construction would be primarily generated by on-site off-road construction equipment, whereas regional emissions during Proposed Project operations would primarily be generated by motor vehicle travel by Proposed Project employees, residents, patrons, guests, and service vehicles. Regional construction emissions during Proposed Project construction would also be generated by construction worker vehicle trips, whereas additional sources of regional operational emissions would include area source emissions such as natural gas consumption for space and water heating, maintenance equipment, and consumer products that contain solvents, as well as stationary source emissions attributable to electricity production, on-site emergency generators, and charbroilers.

The forecasting of regional construction emissions is conservative in that the forecast is based on a relatively large amount of construction occurring in a relatively intensive manner. As such, emission levels would be lower, and most of the time substantially lower, than the emissions forecast included in the Draft EIR. Nonetheless, during peak construction periods, significant impacts would result with regard to regional emissions of VOC and NOx, whereas regional emissions of CO, SOx, PM_{10} and $PM_{2.5}$ even during peak construction periods would be less than significant. A total of 16 mitigation measures have been identified that reduce the Proposed Project's regional construction emissions. Specifically, implementation of Mitigation Measures B-1 and B-3 as well as compliance with SCAQMD Rule 403 would ensure that fugitive dust emissions would be reduced by approximately 61 percent. Mitigation Measure B-4 and B-9 would reduce engine emissions by approximately 50 percent. Mitigation Measures B-8 and B-14 would reduce VOC emissions during the application of architectural coatings by approximately 75 percent. The other mitigation measures (Mitigation Measures B-6, B-7, B-10 through B-13, B-14a, B-14b, and B-14c), while difficult to quantify, would also reduce regional construction emissions. Mitigated regional construction emissions would continue to exceed the SCAQMD regional threshold under the Proposed Project for VOC and NOx, whereas regional construction emissions of CO, SOx, PM_{10}, and $PM_{2.5}$, even during peak construction periods, would be less than significant. Thus, regional construction emissions would result in significant and unavoidable air quality impacts even with the incorporation of feasible mitigation measures.

The forecast of regional operational emissions presented in the Draft EIR reflects development levels that would occur at Project build out. As such, daily emission levels during the development of the Proposed Project would be substantially lower particularly during the early stages of Proposed Project development and increasing over time as more development is completed until the regional operational emission forecast at Proposed Project build out is achieved. Regional operational emissions of CO, NOx, and VOC at Proposed Project build out would exceed the SCAQMD's significance thresholds, which are the same regardless of the size of the project (i.e., the same significance thresholds apply to a 20,000 square foot commercial development as those that apply to the Proposed Project, even though larger projects such as the Proposed Project have greater opportunities to reduce their emissions due to the overall scale of development). Notwithstanding, the Proposed Project's regional operational emissions of CO, NOx, and VOC would be significant, whereas SOx, PM_{10}, and $PM_{2.5}$ regional operational emissions would be less than significant. A total of 11 mitigation measures have been identified that reduce the Proposed Project's regional operational emissions. Specifically, implementation of Mitigation Measures B-15 through B-25 would reduce the Proposed Project's regional operational emissions. The reduction in emissions resulting from the implementation of these mitigation measures are difficult to quantify. Most the Proposed Project's regional operational emissions would result from mobile sources. Mobile source emissions cannot be substantially reduced though mitigation implemented by the Project Applicant as mitigation measures that reduce operational mobile source emissions are under the jurisdiction of the California Air Resources Board (CARB). Although the Proposed Project would incorporate numerous Project design features to reduce operational emissions (e.g., TDM plan and encouraging transit use), regional operational emissions would still exceed the SCAQMD's daily regional operational emission thresholds with regard to NOx, VOC, and CO emissions after implementation of feasible mitigation measures, whereas regional construction emission of SOx, PM_{10}, and $PM_{2.5}$, even at Project build out, would be less than significant. Thus, regional operational emissions would result in significant and unavoidable air quality impacts even with the incorporation of feasible mitigation measures.

Construction of the Proposed Project's entire development program is not anticipated to occur at the same time. As the Proposed Project would be built out over time, emissions associated with the construction of portions of the Proposed Project's total development program would be occurring at the same as the operational emissions generated by those portions of the Proposed Project whose construction is complete and the buildings are occupied. In order to provide a conservative analysis, emissions were forecasted at the point in the Proposed Project's development process whereby most of the Proposed Project would be operational, but a substantial amount of construction would also be occurring at the same time. During concurrent Proposed Project construction and operations, significant impacts would result with regard to regional emissions of CO, VOC, and NOx, whereas regional emissions of CO, PM_{10} and $PM_{2.5}$ during periods of concurrent construction and operations would be less than significant. As discussed above, a total of 28 mitigation measures have been identified that reduce the Proposed Project's regional construction and operational emissions. While implementation of Mitigation Measures B-1 through B-25 (including Mitigation Measures B-14a, B-14b, and B-14c) would reduce construction and operational air pollutant emissions, regional concurrent construction and operational emissions of VOC, NO_X, and CO would exceed both SCAQMD construction and operation thresholds. As a result, the Proposed Project would result in a significant and unavoidable air quality impact even with the incorporation of feasible mitigation measures.

The SCAQMD, as discussed above, has determined that development projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions. As such, regional emissions of VOC and NOx

would be cumulatively significant during Proposed Project construction, operations, and concurrent regional construction and operations even with the incorporation of feasible mitigation measures. Regional operational emissions of CO would also result in a significant cumulative impact in terms of operational and concurrent regional construction and operational conditions even with the incorporation of feasible mitigation measures, but a less than significant impact with regard to regional construction emissions. Lastly, regional emissions of SOx, PM_{10}, and $PM_{2.5}$ would be less than significant on a cumulative basis during Proposed Project construction, operations, and concurrent construction and operations.

6. REFERENCE

For a complete discussion of impacts associated with regional emissions during construction, operation, and concurrent construction and operation, please see Section IV.B, Air Quality, of the Draft EIR; Section III, Corrections and Additions, of the Revised Draft EIR; and Section 2.0, Corrections and Additions to the Draft EIR, of the Final EIR.

B. NOISE - CONSTRUCTION

1. DESCRIPTION OF EFFECTS

The existing noise environment for the Project Site is characterized by vehicular traffic and noises typical to a dense urban area (e.g., sirens, horns, helicopters, etc.). Construction of the Proposed Project would result in temporary increases in ambient noise levels on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities typically require the use of numerous noise-generating pieces of equipment. Activity occurring near the center of the Project Site would generate lower noise levels at sensitive receptors than activity located at the edges of the Project Site. In addition, interior construction would not generate audible noise levels at sensitive receptors. The highest construction noise levels are expected to occur during the grading/excavation and finishing phases of construction.

Based on forecasts of estimated noise levels at sensitive receptors during typical construction activity, off-site noise level increases associated with construction would range from approximately 0.1 to 24.0 dBA, Leq. The City's threshold for noise level increases from incremental construction is 5 dBA. Before mitigation such increases were measured, with the highest construction-related noise increase forecast at a single-family residence located northwest of the Project Site. In addition, when construction activities occur within 500 feet of a residential zone and exceed 75 dBA, Leq at a distance of 50 feet, they are considered to exceed limits contained in LAMC Section 112.05. Noise levels from Proposed Project construction equipment used within 500 feet of a residential zone (e.g., along Crenshaw Boulevard, Marlton Avenue, and Santa Rosalia Drive) would exceed 75 dBA Leq at a distance of 50 feet. Based on these forecasted construction noise levels, Proposed Project construction equipment noise levels would result in a potentially significant impact.

Noise from construction of the Proposed Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet of a construction site only. Due to distance attenuation and the presence of intervening structures, construction noise from one development site would not result in a noticeable increase in noise at sensitive receptors near another development site, which would preclude a cumulative noise impact. This is true of the development of the Proposed Project, and therefore, cumulative construction noise impacts would be less than significant.

2. PROJECT DESIGN FEATURES

The following Project Design Features are relevant to operational on-site stationary noise during construction:

PDF I-1: Hauling activities shall generally occur between the hours of 8:30 A.M. and 4:00 P.M.

PDF I-2: The Project contractor shall equip all construction equipment used at the Project Site with properly operated and maintained noise shielding and/or muffling devices that are consistent with manufacturers' standards. All equipment shall be properly maintained. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

PDF I-3: Project construction shall not include the use of driven piles systems.

3. MITIGATION MEASURES

The following mitigation measures would reduce Proposed Project construction noise impacts.

Mitigation Measure I-5: To the extent feasible, 10-foot-high sound control blankets shall be placed such that the line of sight from ground-level construction equipment and sensitive receptors would be blocked. At Plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

Mitigation Measure I-6: Construction haul truck and materials delivery traffic shall be routed along Crenshaw Boulevard, and shall avoid residential areas whenever feasible.

Mitigation Measure I-7: The construction contractor shall place construction equipment and locate construction staging areas away from sensitive uses when construction sites are not located adjacent to noise sensitive uses.

Mitigation Measure I-8: The construction contractor shall schedule high–noise-producing activities between the hours of 8:00 A.M. and 5:00 P.M. to minimize disruption to sensitive uses.

Mitigation Measure I-9: The construction contractor shall use on-site electrical sources or solar generators to power equipment rather than diesel generators where feasible.

Mitigation Measure I-10: All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

Mitigation Measure I-11: A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

4. FINDINGS

In consideration of impacts identified in the EIR, the Lead Agency considered all feasible mitigation to reduce impacts to less than significant levels. However, despite consideration of all possible mitigation, the project nevertheless result in significant impacts to Noise c=Construction.

Changes or alterations including project design features and mitigation measures have been required in, or incorporated into, the Proposed Project which reduce the Proposed Project's significant construction noise impact, as identified in the EIR. While such measures would reduce the impact, the Proposed Project would result in temporary construction noise impacts above relevant thresholds, and therefore, Proposed Project construction noise impacts would be significant and unavoidable.

Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Proposed Project alternative (No Project Alternative) identified in the Final EIR that would avoid the impacts since that alternative would not satisfy any of the Project objectives nor provide any of the Project benefits, as explained in more detail below in Section IX of these Findings.

5. RATIONALE FOR FINDINGS

Temporary increases in ambient noise levels would occur in the Project vicinity on an intermittent basis during the construction of the Proposed Project. Construction noise levels would vary substantially depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and the presence or absence of noise attenuation barriers. In order to provide a conservative analysis, peak construction noise levels have been forecasted and serve as the basis for determining the significance of the Proposed Project's construction noise impacts even though these noise levels would only be experienced at each off-site noise sensitive use during the period of time when Proposed Project construction is at peak levels and is occurring closest to each off-site noise sensitive receptor. As the distance between the off-site noise sensitive receptor and the location of Proposed Project construction increases, the Proposed Project's construction noise levels would decrease substantially. For example, off-site noise sensitive uses located south of the Project Site would be affected by on-site construction noise when Proposed Project construction occurs in the southern portion of the Project Site's South Area, which would occur during construction of the residences along Santa Rosalia Drive and Marlton Avenue, the proposed hotel, and the parking facilities that would be located near these proposed uses. However, when Proposed Project construction occurs within the Project Site's North Area, construction noise impacts would not occur at the off-site noise sensitive receptors located south of the Project Site.

Even though the duration of exposure to peak construction noise levels would be relatively limited, in the context of the Proposed Project's overall construction time period, peak construction noise levels would result in a significant impact. Specifically, during periods of peak on-site construction, the off-site noise sensitive uses located within 215 feet of the Project Site would be exposed to peak construction noise levels that range from 71.3 dBA to 84.9 dBA. These noise level increases would exceed the 5 dBA incremental construction noise significance threshold at a total of 8 of the 15 off-site noise sensitive locations analyzed. In addition, as Proposed Project construction equipment would exceed 75 dBA L_{eq} at a distance of 50 feet when construction activities occur within 500 feet of a residential zone (e.g., along Crenshaw Boulevard, Marlton Avenue, and Santa Rosalia Drive), Proposed Project construction

activities would not be consistent with the noise standards established within Section 112.05 of the LAMC.

A total of three project design features and 9 mitigation measures have been identified which would reduce Proposed Project construction noise levels, in general, and would also ensure that new residents would be made aware of continuing construction activity at the Project Site, including information on how to contact the noise disturbance coordinator required by Mitigation Measure I-11.

In terms of the effectiveness of the Proposed Project's project design features and mitigation measures, Project Design Feature I-2 would reduce noise levels by approximately 3 dBA. Mitigation Measure I-5 would reduce noise levels by approximately 5 dBA at ground-level sensitive receptors. Mitigation Measures I-6 through I-11 would also assist in attenuating construction noise levels. With the inclusion of the identified project design features and mitigation measures, the Proposed Project's maximum construction noise impact would be reduced from 24.0 dBA to 9.5 dBA and the Proposed Project's significant noise impacts would be eliminated at 4 of the 8 off-site noise sensitive uses that would be significantly impacted prior to the implementation of the Proposed Project's project design features and mitigation measures. While both the maximum impact and the number of significantly impacted off-site noise sensitive receptors would be substantially reduced with the implementation of the Proposed Project's project design features and mitigation measures, Proposed Project peak construction noise levels would nevertheless exceed the 5 dBA significance threshold for increases at four off-site noise sensitive receptors.

The LAMC prohibits the operation of powered equipment that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet between 7:00 A.M. and 10:00 P.M. within 500 feet of a residential zone. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the specified noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the use of construction equipment. Mitigation Measures I-5 through I-11 include feasible and reasonable mitigation measures to reduce the Proposed Project's construction noise levels. Therefore, construction activity would comply with the provisions set forth in LAMC Section 112.05, and a less than significant impact would occur; however, construction noise levels would still exceed the quantitative thresholds, as described above. As such, Proposed Project construction would result in a significant and unavoidable impact.

6. REFERENCE

For a complete discussion of construction noise impacts, please see Section IV.I, Noise, of the Draft EIR; Section III, Corrections and Additions, of the Revised Draft EIR; and Section 2.0, Corrections and Additions to the Draft EIR, of the Final EIR.

C. TRANSPORTATION AND CIRCULATION – OPERATION: INTERSECTION CAPACITY, SITE ACCESS, AND NEIGHBORHOOD INTRUSION IMPACTS

1. DESCRIPTION OF EFFECTS

a) OPERATION: INTERSECTION CAPACITY

The number of motor vehicle trips that would be generated by the Proposed Project and the existing land uses on the Project Site were forecasted taking into consideration the amount of existing and proposed development as well as measures that would reduce Project Site trips

such as the use of non-automotive modes of travel, including walking and transit, pass-by trips[6], and trips from one land use to another within the Project Site. This methodology was approved by the Los Angeles Department of Transportation (LADOT) and reflects standard LADOT policy for projects located in densely developed neighborhoods with high transit availability.

The Project Site at full build out, prior to mitigation, is forecasted to generate a total of 40,974 daily trips on a typical weekday, including approximately 1,375 morning peak-hour trips (760 inbound, 615 outbound) and 3,747 afternoon peak-hour trips (1,877 inbound, 1,872 outbound). On a typical Saturday Midday peak hour, the Proposed Project Site at full build out, prior to mitigation, is forecasted to generate approximately 4,472 trips (2,405 inbound, 2,067 outbound).

The impacts of these trips on intersection capacity was calculated by distributing these trips across the roadway network in the Project vicinity. A total of 55 intersections in the Project vicinity have been analyzed with regard to potential intersection impacts. During the A.M. peak hour, the Proposed Project, without mitigation, would result in a significant traffic impact at the following eight intersections (with the resultant roadway level of service (LOS) shown in parentheses):

- Crenshaw Boulevard & Martin Luther King Jr. Boulevard (LOS E);
- Crenshaw Boulevard & Stocker Street (LOS D);
- Crenshaw Boulevard & Vernon Avenue (LOS D);
- Crenshaw Boulevard & Slauson Avenue (LOS E);
- Arlington Avenue & Martin Luther King Jr. Boulevard (LOS D);
- La Brea Avenue & Jefferson Boulevard (LOS F);
- La Brea Avenue & Rodeo Road (LOS F); and
- Crenshaw Boulevard & Adams Boulevard (LOS F).

Three of the eight impacted intersections would operate at LOS D with the Proposed Project. Two of the impacted intersections would operate at LOS E. Three of the impacted intersections would operate at LOS F, although all of these intersections would also operate at LOS F without the Proposed Project.

During the P.M. peak hour, the Proposed Project, without mitigation, would result in a significant traffic impact at the following 14 intersections (with the resultant roadway LOS shown in parentheses):

- Crenshaw Boulevard & 39th Street (LOS C);
- Crenshaw Boulevard & Martin Luther King Jr. Boulevard (LOS F);
- Crenshaw Boulevard & Stocker Street (LOS E);
- Crenshaw Boulevard & Vernon Avenue (LOS D);
- Crenshaw Boulevard & Slauson Avenue (LOS E);
- Crenshaw Boulevard & Jefferson Boulevard (LOS E);
- Arlington Avenue & Martin Luther King Jr. Boulevard (LOS E);
- La Brea Avenue & Jefferson Boulevard (LOS E);
- La Brea Avenue & Rodeo Road (LOS F);
- La Brea Avenue & Stocker Street & Overhill Drive (LOS E);
- La Brea Avenue & Adams Boulevard (LOS F);
- La Brea Avenue & Slauson Avenue (LOS F);
- Crenshaw Boulevard & Adams Boulevard (LOS F); and

[6] A pass-by trip is a trip by a person who is already in the Project Site vicinity and simply diverts from his/her route to patronize the Proposed Project. These are not new trips added to the area, and, thus, their effect local traffic due to the Proposed Project is limited to the diverted portion of their route.

- Western Avenue & Martin Luther King Jr. Boulevard (LOS E).

Two of the 14 impacted intersections would operate at LOS C or LOS D with the Proposed Project. Seven of the impacted intersections would operate at LOS E. Five of the impacted intersections would operate at LOS F, although two of these intersections (La Brea Avenue & Slauson Avenue and La Brea Avenue & Rodeo Road) would also operate at LOS F without the Proposed Project.

During the Saturday Midday peak hour, the Proposed Project, prior to mitigation, would result in a significant traffic impact at the following 13 intersections (the resultant LOS in parentheses):

- Crenshaw Boulevard & 39th Street (LOS C);
- Crenshaw Boulevard & Martin Luther King Jr. Boulevard (LOS D);
- Crenshaw Boulevard & Stocker Street (LOS D);
- Crenshaw Boulevard & Homeland Drive/43rd Street (LOS C);
- Crenshaw Boulevard & Slauson Avenue (LOS E);
- Crenshaw Boulevard & Jefferson Boulevard (LOS F);
- Crenshaw Boulevard & Exposition Boulevard (LOS D);
- Crenshaw Boulevard & Rodeo Road (LOS D);
- Arlington Avenue & Martin Luther King Jr. Boulevard (LOS E);
- La Brea Avenue & Jefferson Boulevard (LOS F);
- La Brea Avenue & Rodeo Road (LOS F);
- Crenshaw Boulevard & Adams Boulevard (LOS F); and
- Western Avenue & Martin Luther King Jr. Boulevard (D).

Seven of the 13 impacted intersections would continue to operate at LOS C or LOS D with the Proposed Project, and two of the intersections would operate at LOS E. Four of the intersections would operate at LOS F, although except for one intersection (Crenshaw Boulevard & Jefferson Boulevard), these intersections would also operate at LOS F without the Proposed Project.

b) OPERATION: SITE ACCESS

Access to the Proposed Project at build out would occur via 12 driveways, four of which would be new driveways located within the North Area of the Project Site. The 12 driveways are located as follows: (1) four driveways would be located along Crenshaw Boulevard, two of which would be new and serve the North Area; (2) one existing driveway would be located along Stocker Street, (3) two existing driveways would be located along Santa Rosalia Drive; (3) three driveways would be located along Marlton Avenue, two of which would be new and serve the North Area; and (4) two existing driveways would be located along Martin Luther King Jr. Boulevard.

As a mixed-use development with residential, hotel, office, retail, and entertainment uses, the Proposed Project would include an improved pedestrian environment. The Proposed Project's pedestrian circulation plan would include increased points of entry from the exterior property boundaries, widened pedestrian walkways, landscaping, street furniture and bus shelters along the Project periphery, and striped and signalized pedestrian crosswalks linking the on-site land uses. The pedestrian bridge over Martin Luther King Jr. Boulevard would be retained so that the North Area and South Area would continue to operate as a single site with people able to park on one block and walk to uses on the other block.

Proposed Project operations are forecasted to have significant access impacts at the following three access locations before mitigation:

1. North Area driveway from Martin Luther King Jr. Boulevard;
2. South Area driveway from Martin Luther King Jr. Boulevard; and
3. South Area main driveway from Crenshaw Boulevard.

No dedicated bicycle lanes currently exist on the streets providing access to the Project Site. However, the Los Angeles Bicycle Plan shows future bicycle lanes on Martin Luther King Jr. Boulevard and Crenshaw Boulevard adjacent to the Project Site. When these bicycle lanes are implemented they will cross six of the 12 Proposed Project driveways. A potential operational impact could exist at these six driveway locations, depending on the level of bicycle ridership that occurs along the adjacent streets.

c) OPERATION: NEIGHBORHOOD INTRUSION IMPACTS

The Proposed Project's traffic analysis also includes an evaluation of the potential for Proposed Project traffic to travel through the residential neighborhoods in the Project vicinity as an alternative to traveling along the major roadways due to congested traffic conditions along those roadways. Based on LADOT criteria, the following six neighborhoods were identified as being potentially susceptible to neighborhood intrusion impacts (cut-through traffic) as a result of the Proposed Project:

1. Adams Boulevard to the north, Crenshaw Boulevard to the east, Martin Luther King Jr. Boulevard to the south, and Buckingham Street to the west.
2. Adams Boulevard to the north, Degnan Boulevard/11th Avenue to the east, Martin Luther King Jr. Boulevard to the south, and Crenshaw Boulevard to the west.
3. Martin Luther King Jr. Boulevard to the north, Normandie Avenue to the east, 42nd Place to the south, and Leimert Boulevard to the west.
4. Vernon Avenue to the north, 8th Avenue to the east, Slauson Avenue to the south, and Crenshaw Boulevard to the west.
5. Stocker Street to the north, Crenshaw Boulevard to the east, Slauson Avenue to the south, and West Boulevard to the west.
6. Martin Luther King Jr. Boulevard to the north, Marlton Avenue to the east, Santa Rosalia Drive to the south, and Coliseum Street to the west.

When considering these types of impacts it is not possible to predict with a reasonable degree of certainty whether such neighborhood intrusion traffic would occur at a level sufficient to result in a significant adverse impact, since the changes in traffic patterns are based on a number of factors, including individual driver perception of the likely reduction in travel time on an alternative route (neighborhood streets). It is also not possible to predict in which neighborhoods or on which streets within each neighborhood any such potentially significant neighborhood intrusion traffic impact might occur. In addition, because such assessments cannot be made at this time, it also cannot be determined whether any feasible mitigation measures could be implemented that would lessen or eliminate such potentially significant impacts or determine what neighborhood measures the local community would prefer that addresses the potentially significant neighborhood traffic intrusions.

LADOT has developed a process over many years to assess the nature of these types of impacts, as well as a range of traffic measures designed to address potentially significant impacts. The LADOT process is an iterative one through which the impacted neighborhood is included in the process to help assess which traffic calming options are preferred by the community being affected and ultimately to let the community itself make the decision whether to implement the traffic calming measures. In some neighborhoods, significant impacts that are thought to occur never materialize. In locations where a significant impact does occur, the

community may decide to implement traffic calming measures that reduce the impact to below the level of significance and, in other neighborhoods, the measures themselves are considered to be undesirable and the community decides not to implement them and the neighborhood intrusion traffic impact remains significant and unmitigated. Thus, a significant and unavoidable impact would occur when a significant neighborhood intrusion impact actually occurs and the community chooses not to implement measures that would mitigate the significant impact.

d) CUMULATIVE IMPACTS

Cumulative traffic conditions would result in significant impacts at several intersections and the Proposed Project would contribute to these impacts. Thus, the Proposed Project's contribution to impacts that would occur under future cumulative conditions would be considerable, and thus are concluded to be significant cumulative impacts. Although the identified intersection mitigation measures would reduce several of the significant impacts to a less than significant level, some of the impacts would remain significant and unavoidable. Therefore, the Proposed Project's cumulative impacts with regard to intersection capacity would remain significant and unavoidable.

Cumulative traffic conditions would also result in significant access impacts at three access locations after mitigation. Due to physical constraints, no improvements could be identified that would fully mitigate the Proposed Project's impact at these access locations to a less than significant level. Therefore, the Proposed Project's cumulative impacts with regard to site access would be significant and unavoidable.

Cumulative traffic conditions could also result in significant cut-through traffic in up to six neighborhoods surrounding the Project Site. Since these impacts cannot be predicted with certainty and are subject to a range of solutions that may or may not be desired by local residents, it is conservatively concluded that the Proposed Project's cumulative impacts with regard to cut-through traffic could be significant and unavoidable.

2. PROJECT DESIGN FEATURES

Although the Proposed Project includes a number of features that accommodate and enhance access to and circulation within the site for pedestrians, bicycles and motor vehicles, as well as transit amenities including direct access to the future rail station for the Metro Crenshaw/LAX Line, there are no Project Design Features for these environmental issues.

3. MITIGATION MEASURES

The following mitigation measures reduce the Proposed Project's operational intersection capacity impacts:

Mitigation Measure L-3: The Proposed Project shall upgrade the traffic signal timing controllers to Type 2070 controllers, to the satisfaction of LADOT, at the following locations:

6. Marlton Avenue & Project Driveway
7. Marlton Avenue & Santa Rosalia Drive
8. Project Driveway/Victoria Avenue & Stocker Street
9. Santa Rosalia Drive/Angeles Vista Boulevard & Stocker Street
12. Leimert Boulevard & 43rd Street/11th Avenue
51. Arlington Avenue & Jefferson Boulevard

- Buckingham Road & 29th Street
- Buckingham Road & Jefferson Boulevard

- Buckingham Road & Exposition Boulevard
- Buckingham Road & Rodeo Road
- Buckingham Road & Coliseum Street
- Buckingham Road & Santa Rosalia Drive
- Farmdale Avenue & Jefferson Boulevard
- Farmdale Road & Rodeo Road
- Harcourt Avenue & Jefferson Boulevard
- Hillcrest Drive & Rodeo Road
- Hillcrest Drive & Martin Luther King Jr. Boulevard
- Hillcrest Drive & Santa Rosalia Drive
- Degnan Boulevard & Stocker Street
- Leimert Boulevard & Stocker Street
- Westside Avenue/9th Street & Martin Luther King Jr. Boulevard
- 4th Avenue & Martin Luther King Jr. Boulevard
- Dublin Avenue & 39th Street

Mitigation Measure L-4: The Proposed Project shall fund the installation of CCTV cameras at the following locations:

20. Crenshaw Boulevard & Coliseum Street
26. Buckingham Road & Martin Luther King Jr. Boulevard
29. La Brea Avenue & Rodeo Road
53. Western Avenue & Martin Luther King Jr. Boulevard (upgrade of existing camera)

Mitigation Measure L-5: The Proposed Project shall fund the installation of system loops at the following locations:

6. Marlton Avenue & Project Driveway
7. Marlton Avenue & Santa Rosalia Drive (four loops)
8. Project Driveway/Victoria Avenue & Stocker Street
12. Leimert Boulevard & 43rd Street/11th Avenue
- Buckingham Road & Exposition Boulevard
- Buckingham Road & Santa Rosalia Drive
- Farmdale Avenue & Jefferson Boulevard
- Farmdale Road & Rodeo Road
- Harcourt Avenue & Jefferson Boulevard
- Hillcrest Drive & Rodeo Road
- Hillcrest Drive & Martin Luther King Jr. Boulevard
- Hillcrest Drive & Santa Rosalia Drive
- Westside Avenue/9th Street & Martin Luther King Jr. Boulevard
- 4th Avenue & Martin Luther King Jr. Boulevard

Mitigation Measure L-6: The Proposed Project shall contribute $100,000 toward the implementation of bikeway improvements within the Study Area under the 2010 Bicycle Plan.

No feasible mitigation measures have been identified with regard to the Proposed Project's operational site access impacts.

The following mitigation measures reduce the Proposed Project's operational neighborhood intrusion impacts:

Mitigation Measure L-13: The Applicant or its successors fund and coordinate implementation of LADOT's Neighborhood Traffic Management Plan process for the Project, in an amount up to

$300,000. The Applicant will conduct traffic counts on various local residential streets prior to construction of the Project to serve as a baseline for assessing Project-related significant neighborhood intrusion impacts. Eligible communities shall include the residential neighborhoods within the boundaries listed below:

1. Adams Boulevard to the north, Crenshaw Boulevard to the east, Martin Luther King Jr. Boulevard to the south, and Buckingham Street to the west.
2. Adams Boulevard to the north, Degnan Boulevard/11th Avenue to the east, Martin Luther King Jr. Boulevard to the south, and Crenshaw Boulevard to the west.
3. Martin Luther King Jr. Boulevard to the north, Normandie Avenue to the east, 42nd Place to the south, and Leimert Boulevard to the west.
4. Vernon Avenue to the north, 8th Avenue to the east, Slauson Avenue to the south, and Crenshaw Boulevard to the west.
5. Stocker Street to the north, Crenshaw Boulevard to the east, Slauson Avenue to the south, and West Boulevard to the west.
6. Martin Luther King Jr. Boulevard to the north, Marlton Avenue to the east, Santa Rosalia Drive to the south, and Coliseum Street to the west.

4. FINDINGS

In consideration of impacts identified in the EIR, the Lead Agency considered all feasible mitigation to reduce impacts to less than significant levels. However, despite consideration of all possible mitigation, the project nevertheless result in significant impacts to Transportation and Circulation – Operation: Intersection Capacity, Site Access, and Neighborhood Intrusion Impacts.

Changes or alterations including mitigation measures have been required in, or incorporated into, the Proposed Project which reduce the Proposed Project's significant Project-specific and cumulative impacts with regard to intersection capacity, site access, and neighborhood cut-through traffic during Proposed Project operations, as identified in the EIR. While such measures would reduce these impacts, the Proposed Project would result in intersection capacity, site access, and neighborhood cut-through traffic during Proposed Project operations that are above the relevant thresholds, and therefore, Proposed Project impacts with regard to intersection capacity, site access, and neighborhood cut-through traffic impacts during Proposed Project operations would be significant and unavoidable.

Pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Proposed Project alternative (No Project Alternative) identified in the Final EIR that would avoid these impacts since that alternative would not satisfy any of the project objectives nor provide any of the project benefits, as explained in more detail below in Section IX of these Findings.

5. RATIONALE FOR FINDINGS

The Proposed Project at full build out prior to mitigation would result in significant impacts at 17 individual intersections (8 intersections in the A.M. peak hour, 14 intersections in the P.M. peak hour and 13 in the Saturday Midday peak hour). A comprehensive set of mitigation measures have been identified to address these significant impacts. The mitigation measures include upgrading traffic signal controllers at 23 locations, funding for the installation of closed circuit television cameras at four locations, funding the installation of intersection system loops at 14 locations, and contributing $100,000 toward the implementation of bikeway improvements that

have been identified in the Los Angeles Bicycle Plan. The Proposed Project's transportation mitigation program would mitigate seven of the 17 impacted intersections, resulting in significant and unavoidable impacts remaining at the following intersections:

- Crenshaw Boulevard & 39th Street: This intersection is projected to operate at LOS C during the weekday afternoon peak hour.
- Crenshaw Boulevard & Martin Luther King Jr. Boulevard: This intersection is projected to operate at LOS E during the weekday morning peak hour, LOS F during the weekday afternoon peak hour, and LOS C during Saturday midday peak hours.
- Crenshaw Boulevard & Stocker Street: This intersection is projected to operate at LOS E during the weekday afternoon peak hour and LOS D during Saturday midday peak hours.
- Crenshaw Boulevard & Jefferson Boulevard: This intersection is projected to operate at LOS E during the weekday afternoon peak hour and Saturday midday peak hours.
- Arlington Avenue & Martin Luther King Jr. Boulevard: This intersection is projected to operate at LOS D during the weekday morning peak hour and LOS E during both the weekday afternoon and Saturday midday peak hours.
- La Brea Avenue & Jefferson Boulevard: This intersection is projected to operate at LOS F during Saturday midday peak hours.
- La Brea Avenue & Rodeo Road: This intersection is projected to operate at LOS F during all analyzed peak hours.
- La Brea Avenue/Overhill Drive & Stocker Street: This intersection is projected to operate at LOS E during the weekday afternoon peak hour.
- La Brea Avenue & Slauson Avenue: This intersection is projected to operate at LOS F during the weekday afternoon peak hour.
- Western Avenue & Martin Luther King Jr. Boulevard: Western Avenue & Martin Luther King Jr. Boulevard: This intersection is projected to operate at LOS E during the weekday morning peak hour.

The significant impacts identified above reflect conditions under Future with Project conditions. All study intersections were also analyzed under Existing with Project conditions. Under this analysis scenario, the intersection of Crenshaw Boulevard & Adams Boulevard would also be significantly impacted by Proposed Project development. Under Existing with Project conditions, this intersection is projected to operate at LOS E during the weekday afternoon peak hour.

At the significantly impacted intersections after mitigation, no further physical improvements are feasible based on the following:

Intersection #1—Crenshaw Boulevard & 39th Street - The geometry of the intersection to accommodate the frontage roads on Crenshaw Boulevard north and south of 39th Street preclude any feasible physical mitigation that would be required to fully mitigate the Proposed Project's impact at this location. The physical improvement proposed at this location was rejected by LADOT because of the inability to safely align the eastbound through lane and the loss of parking on 39th Street.

Intersection #3—Crenshaw Boulevard & Martin Luther King Jr. Boulevard - Existing buildings on all four corners of the intersection preclude any feasible physical mitigation that would be required to fully mitigate the Proposed Project's impact at this location. Additionally, this intersection is the site of a future rail station for the Metro Crenshaw/LAX Line, further limiting the ability to affect any physical improvements.

Intersection #4—Crenshaw Boulevard & Stocker Street - Existing private property on all four corners of the intersection precludes any feasible widening to add capacity to this location.

Intersection #17—Crenshaw Boulevard & Jefferson Boulevard - Existing private property on all four corners of the intersection precludes any feasible widening to add capacity to this location.

Intersection #24—Arlington Avenue & Martin Luther King Jr. Boulevard - Existing buildings on all four corners of the intersection precludes any feasible physical mitigation that would be required to fully mitigate the Project impact at this location.

Intersection #28—La Brea Avenue & Jefferson Boulevard - Existing buildings on all four corners of the intersection as well as the Metro Expo line immediately to the south precludes any feasible physical mitigation that would be required to fully mitigate the Proposed Project's impact at this location.

Intersection #29—La Brea Avenue & Rodeo Road - Existing buildings on all four corners of the intersection preclude any feasible physical mitigation that would be required to fully mitigate the Proposed Project's impact at this location.

Intersection #31—La Brea Avenue/Overhill Drive & Stocker Street - There is open land on several sides of this intersection. However, the necessary scale of any potential improvement to this intersection, especially considering the topography of the terrain, is beyond the scope of the Proposed Project.

Intersection #41—La Brea Avenue & Slauson Avenue - Existing structures on all four corners of the intersection precludes any feasible physical mitigation that would be required to fully mitigate the Proposed Project's impact at this location.

Intersection #47—Crenshaw Boulevard & Adams Boulevard - Existing private property on all four corners of the intersection precludes any feasible widening to add capacity to this location.

Intersection #53—Western Avenue & Martin Luther King Jr. Boulevard - Existing buildings on all four corners of the intersection precludes any feasible physical mitigation that would be required to fully mitigate the Proposed Project's impact at this location.

Thus, Proposed Project development would result in significant and unavoidable impacts with regard to intersection capacity during Proposed Project operations.

Vehicle access to the Project Site would occur via 12 driveways, 8 of which are existing driveways and 4 of which would be new driveways located within the North Area of the Project Site. With regard to these 12 locations, due to physical constraints, improvements are not available to fully mitigate the Proposed Project's impacts at the following three access locations to a less than significant level:

- North Area driveway from Martin Luther King Jr. Boulevard;
- South Area driveway from Martin Luther King Jr. Boulevard; and
- South Area main driveway from Crenshaw Boulevard.

Therefore, Proposed Project impacts with regard to these three access locations would be significant and unavoidable.

No dedicated bicycle lanes currently exist on the streets providing access to the Project Site. However, the Los Angeles Bicycle Plan shows future bicycle lanes on Martin Luther King Jr.

Boulevard and Crenshaw Boulevard adjacent to the Project Site. When these bicycle lanes are implemented, they will cross six of the 12 Proposed Project driveways. City review of the final design for the Proposed Project's driveways that are crossed by these bicycle lanes would address all issues relating to the interface of these driveways and the proposed bicycle lanes to reduce any potential impacts to a less than significant level. In addition, funding currently only exists for the stretch of the bicycle lane along Martin Luther King Jr. Boulevard from Crenshaw Boulevard to the west. Mitigation Measure L-6 provides for a $100,000 contribution by the Project Applicant to implement bikeway improvements within the Project traffic study area that have been identified in the Los Angeles Bicycle Plan. Thus, bicycle access impacts would be less than significant and no mitigation is required.

Proposed Project development also has the potential to result in increased traffic levels within the residential neighborhoods surrounding the Project Site as drivers along the main roadways in the Project vicinity seek alternate travel routes due to congested traffic conditions along the main roadways. Due to the uncertainties surrounding the potentially impacted areas, including the uncertainty over whether any impact will even occur, in an abundance of caution, the potential for neighborhood intrusion impacts as a result of Proposed Project development are considered to be significant. To address this significant impact, a Neighborhood Traffic Management Plan process has been incorporated into Mitigation Measure L-13. However, because it is possible that a significant impact may occur and that one or more neighborhoods may opt not to implement mitigation measures, it is not possible to determine now whether such a potential neighborhood intrusion impact would be fully mitigated were it to occur. Accordingly, it is conservatively concluded that even with the identified mitigation measure, this potentially significant impact will not be fully mitigated. Thus, Proposed Project development would result in a significant and unavoidable impact with regard to neighborhood cut-through traffic during Proposed Project operations.

6. REFERENCE

For a complete discussion of transportation and circulation impacts with regard to intersection capacity, site access, and neighborhood intrusion impacts during Proposed Project operations, please see Section IV.L, Transportation and Circulation, of the Draft EIR; Section III, Corrections and Additions, of the Revised Draft EIR; and Section 2.0, Corrections and Additions to the Draft EIR, of the Final EIR.

IX. ALTERNATIVES TO THE ORIGINAL PROJECT

In addition to the Original Project, the Draft EIR evaluated a reasonable range of five alternatives. These alternatives included: (1) No Project Alternative (Continuation of Existing On-Site Use); (2) Existing Zoning Alternative; (3) 25 Percent Reduced Project Alternative; (4) 50 Percent Reduced Project Alternative; and (5) Land Use (Residential to Office Conversion) Alternative. In accordance with CEQA requirements, the range of alternatives includes a "No Project" alternative and alternatives capable of eliminating the significant adverse impacts of the Proposed Project. These alternatives and their impacts are summarized below.

Among the alternatives described below is the Original Project. The Proposed Project differs from the Original Project in the following ways: (1) Development Area 1 – Retail and Entertainment Area was modified to retain an existing building (Outbuilding B); (2) the amount of building demolition was reduced from 90,898 square feet to 77,933 square feet; (3) the number of on-site parking spaces was reduced from a total of 6,957 parking spaces to 6,829 parking spaces, a reduction of 128 parking spaces; (4) the maximum building height of the proposed office building was reduced from 145 feet to 135 feet (10 stories) and the maximum

building height for the proposed hotel was reduced from 135 feet to 94 feet (8 stories). Given these differences, the Original Project is also considered as an alternative to the Proposed Project. In addition, as discussed in more detail below, the Proposed Project will result in similar or lesser environmental impacts in all areas studied in the Draft EIR, including the Original Project.

A. SUMMARY OF FINDINGS

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure within its powers will substantially lessen any significant effect of the Proposed Project, reduce the significant, unavoidable impacts of the Proposed Project to a level that is less than significant, or avoid any significant impact the Proposed Project would have on the environment.

B. PROJECT OBJECTIVES

An important consideration in the analysis of alternatives is the degree to which such alternatives would achieve the objectives of the Proposed Project. As described in the EIR, the objectives of the Proposed Project are as follows:

Community-Oriented Objectives

- To contribute to the revitalization of the West Adams–Baldwin Hills–Leimert Community Planning Area of the City of Los Angeles by providing an example of "smart-growth" which is an infill development consisting of a mixed-use retail, office, hotel, and residential development;

- To provide opportunities for viable commercial, retail, entertainment, and office space in a manner that is complementary to the existing character of the adjoining commercial and residential neighborhoods; and

- To provide market-rate home ownership and leasing opportunities within the West Adams–Baldwin Hills–Leimert Community Planning Area of the City of Los Angeles.

Existing Development Objective

- To implement a development plan that would allow for the concurrent operation of existing retail operations while new structures and infrastructure are being constructed in a manner that minimizes disruptions to existing businesses.

Site Design Objectives

- To create a safe, secure and defensible regional shopping area integrated with office, hotel and residential land uses;

- To replace outdated and inefficient buildings and building operating systems with new architectural designs and energy efficient building systems and utility infrastructure that promote energy conservation;

- To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and outdoor plazas;

- To provide a sufficient amount of parking to accommodate the Proposed Project's demands for a competitive and viable market place, to not undermine transit goals and transit use by providing excessive parking, to provide for an efficient parking supply that allows for shared parking between commercial uses where feasible, and to provide sufficient parking to meet City Municipal Code requirements;

- To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping; and

- To develop the site in a manner that minimizes the footprints of parking areas and buildings to allow more surface area to be improved with open space amenities, pedestrian circulation areas, and landscaping.

Alternative Transportation Objectives

- To develop an urban village and a walkable neighborhood that would provide alternatives to relying solely on the car; e.g., by providing a mix of land uses, access to transit, and opportunities for walking to destinations; and

- To promote walking and bicycle use through enhanced pedestrian connections and bicycle routes in a mixed-use project, which integrates housing with employment opportunities within the Crenshaw Transit Corridor.

Mixed-Use Development Objectives

- To add a variety of housing ownership opportunities in the community by providing a mixed-use project comprised of housing, retail, entertainment, office and hotel uses, thus creating a better balance of housing and employment opportunities;

- To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, together with retail, hotel, office, and restaurant uses, and public open space within the Crenshaw Redevelopment Project Area; and

- To implement a land use equivalency program that would provide the flexibility to exchange certain land uses of equal or lesser environmental impacts within the overall development envelope to accommodate market demands.

Employment Objectives

- To provide meaningful roles for minority-owned businesses in the construction of the Proposed Project; and

- To generate temporary construction trade jobs and additional employment opportunities within the Project Site.

In addition to the Project-specific objectives identified by the Project Applicant, the following objectives are identified in the Crenshaw Redevelopment Plan:

- To eliminate and prevent the spread of blight and deterioration and to conserve, rehabilitate and redevelop the [Crenshaw Redevelopment] Project Area in accord with the General Plan and the Redevelopment Plan;

- To encourage the investment of the private sector in the development and redevelopment of the [Crenshaw Redevelopment] Project Area by eliminating impediments to such development and redevelopment;
- To stabilize and restore the economic vitality of this regional center of the City of Los Angeles;
- To stabilize and restore tax revenues to the City of Los Angeles;
- To enhance shopping opportunities for the area residents;
- To promote the physical, social and economic well being of the [Crenshaw Redevelopment] Project Area, the City of Los Angeles, and its citizens; and
- To promote the development of local job opportunities.

C. PROJECT ALTERNATIVES ANALYZED AND REJECTED

1. ORIGINAL PROJECT

a) DESCRIPTION OF ALTERNATIVE

The Original Project, as described in the Draft EIR, combines the retention of the existing mall building, a stand-alone movie theater building, and one free-standing building occupied by a commercial retail use (Outbuilding D), with new development that creates a pedestrian-oriented mixed-use development that complements and enhances the existing on-site uses. Under the Original Project, Outbuildings A-C and E-K would be demolished, and the Project Site would be redeveloped resulting in a mixed-use retail, commercial, office, hotel, and residential development totaling approximately 3,072,956 square feet of net floor area. As the Project Site currently contains approximately 1.02 million square feet of various types of commercial development, the Original Project would add a total of approximately 2.06 million square feet of development to the Project Site, which would consist of approximately 820,000 square feet of commercial development and 961 residential units (totaling approximately 1.235 million residential square feet). The new uses to be added to the Project Site include 331,838 square feet of retail and related commercial uses; a 346,500 square-foot, hotel providing up to 400 rooms; approximately 143,377 square feet of office uses; and a total of up to 961 residential units, consisting of 551 residential condominium units and 410 apartment units. In addition, the Original Project included the development of 6,957 parking spaces, an increase of 3,675 parking spaces at the Project Site compared to existing conditions. The removal of Outbuildings A-C and E-K from the Project Site would result in the demolition of 90,898 square feet of existing commercial floor area. Maximum building heights under the Original Project for the office and hotel buildings would be 135 feet within the South Area, which has been reduced to 94 feet under the Proposed Project for the hotel, and 145 feet within the North Area for the office building, which has been reduced to 135 feet under the Proposed Project.

b. FINDINGS

Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Original Project as described in the EIR. With the Original Project, the new environmental impacts projected to occur from development would be generally similar to those projected to occur from the Proposed Project, although some would be slightly greater. However, the Original

Project does not address public concerns regarding view impacts to the same degree as the Proposed Project. Because the Original Project would be inferior to the Proposed Project with respect to responding to public input and would furthermore not reduce any significant impacts to a level of insignificance, this Alternative is infeasible and is less desirable than the Proposed Project.

c. IMPACT SUMMARY OF ALTERNATIVE

The overall floor area of the Original Project (total of 3.07 million square feet and net new floor area of approximately 2.06 million square feet) would be the same as the Proposed Project, although the portion of the Project Site that would be developed, as well as the amount of on-site parking, demolition, and maximum building heights within both the North and South Areas would all be greater under the Original Project. All other attributes of the Original Project are the same as those found within the Proposed Project. The Original Project, compared to the Proposed Project, would result in greater impacts associated with views due to the greater building heights under the Original Project, and greater construction air quality and greenhouse gas emissions, noise (construction), and geology/soils impacts due to the greater amount of demolition under the Original Project. As with the Proposed Project, view and geology/soils impacts would be less than significant, and air quality (construction) and noise (construction) impacts would be significant and unavoidable even with the implementation of all project design features and feasible mitigation measures. Relative to the Proposed Project, the Original Project would result in similar impacts regarding aesthetics (visual character, light, glare, and shading); air quality (other than construction air quality); greenhouse gas emissions (other than construction greenhouse gas emissions); cultural resources (historic resources and archaeological and paleontological resources); geology and soils (other than related to excavation); hazards and hazardous materials; hydrology and water quality; land use and planning; noise (other than construction noise); population, housing, and employment; public services (fire protection, police, schools, recreation and parks, and libraries); transportation and circulation; and utilities and services (wastewater, water supply, solid waste, and energy).

d. RATIONALE FOR FINDINGS

The Original Project would provide the same floor area and residential units as the Proposed Project, but would have greater view impacts. All uses, including retail, commercial, office, hotel, and residential, would be the same as under the Proposed Project. In addition, all amenities, such as the pedestrian and transit accessibility improvements, landscaping, and common open space would be the as those under the Proposed Project. Because the Original Project would differ from the Proposed Project only in terms of reduced maximum building height for the office and hotel buildings on the Project Site, minor changes to the portion of the Project Site that would be developed, and the amount of demolition and parking, the Original Project would meet most of the Project objectives. However, the Original Project does not reduce any of the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to a less than significant level. Because the Original Project would be inferior to the Proposed Project with respect to view impacts and would furthermore not eliminate any significant impacts, this Alternative is less desirable than the Proposed Project.

e. REFERENCE

For a complete discussion of impacts associated with the Original Project, please see Section IV, Environmental Impact Analysis, of the Draft EIR.

1. ALTERNATIVE 1: NO PROJECT ALTERNATIVE (CONTINUATION OF EXISTING ON-SITE USE)

a) DESCRIPTION OF ALTERNATIVE

Alternative 1 assumes that the Proposed Project would not be developed and that the existing land uses within the Project Site would remain unchanged (i.e., no new development and no changes to the existing site except for normal ongoing maintenance and updates). Thus, Alternative 1 would produce no change to the existing physical condition and use of the Project Site. The existing Baldwin Hills Crenshaw Plaza would continue to occupy the Project Site and would remain operational. As discussed above, the Project Site is currently developed with approximately 1.02 million square feet of retail, restaurant, and commercial floor area.

b) IMPACT SUMMARY OF ALTERNATIVE

This Alternative would result in no new impacts and no Proposed Project benefits, as no new development would occur on the Project Site. Compared to the Proposed Project, this Alternative would result in impacts with regard to geology/soils and land use compatibility that would not be any different than existing conditions. Alternative 1, when compared to the Proposed Project would have comparatively less impacts associated with aesthetics (visual character, views, light, glare, and shading); air quality; greenhouse gas emissions; cultural resources (historic resources and archaeological and paleontological resources); hazards and hazardous materials; noise; public services (fire protection, police, schools, recreation and parks, and libraries); transportation and circulation; and utilities and services (wastewater, water supply, solid waste, and energy). However, the No Project Alternative (Continuation of Existing On-Site Use) would have comparatively greater impacts with regard to hydrology and water quality, land use plans, employment related population growth, and housing. Specifically, Alternative 1 would not implement current regulatory requirements which would improve current hydrology and water quality conditions at the Project Site as well as not implementing the General Plan Framework's Regional Center policies to support/create mixed-use developments within regional centers or to encourage new mixed use and commercial development in close proximity to transit and infrastructure. Alternative 1 would also not assist in contributing towards achieving the City's Regional Housing Needs Assessment (RHNA) goal of facilitating the development of 82,002 new housing units by 2021 or supporting new housing near commercial centers, transit oriented districts and mixed-use areas. In addition, Alternative 1 would also not support employment or housing growth at the Project Site nor support the population, employment, and housing policies set forth in SCAG's 2012 RTP/SCS Plan and Compass Growth Visioning Strategy that aim to encourage growth near major transit systems, encourage infill development, and encourage the redevelopment of existing urbanized areas. Alternative 1 would also not support the Community Plan's goals and policies that encourage pedestrian-oriented uses and activities near regional centers as well as creating mixed-use projects in close proximity to transit stations, along transit corridors, and in commercial areas.

In summary, Alternative 1 would reduce impacts across many environmental issues; including reducing the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to a less than significant level.

However, Alternative 1 would have greater impacts with regard to hydrology and water quality, land use plans, employment related population growth, and housing.

c) FINDINGS

With this Alternative, the new environmental impacts projected to occur from development of the Proposed Project would be avoided or reduced. Therefore, this Alternative would be an environmentally superior alternative to the Proposed Project. However, this Alternative would accomplish none of the objectives of the Proposed Project. Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative (Continuation of Existing On-Site Use) described in the EIR.

d) RATIONALE FOR FINDINGS

The No Project Alternative (Continuation of Existing On-Site Use) would retain the existing on-site uses, including 1,016,741 square feet of retail, restaurant, and commercial space. Under this Alternative, no new development would occur and no changes to the existing site would occur except for normal ongoing maintenance and updates. Thus, Alternative 1 would produce no change to the existing physical condition and use of the Project Site. This Alternative would not meet any of the Project objectives listed above under Subsection B, Project Objectives. The No Project (Continuation of Existing On-Site Use) Alternative additionally would not provide certain environmental benefits that the Proposed Project offers, such as the provision of commercial activity, housing, employment growth, and common open space areas at a site adjacent to an extensive network of transit opportunities. As no new development would occur at the Project Site, the No Project Alternative (Continuation of Existing On-Site Use) would avoid the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic. Overall, the No Project Alternative (Continuation of Existing On-Site Use) would be inferior to the Proposed Project as it does not achieve any of the Project objectives. Therefore, this Alternative is infeasible and less desirable than the Proposed Project and is rejected for the reasons stated above.

e) REFERENCE

For a complete discussion of impacts associated with Alternative 1, please see Section V, Alternatives to the Proposed Project, of the Draft EIR.

2. ALTERNATIVE 2: EXISTING ZONING ALTERNATIVE

a) DESCRIPTION OF ALTERNATIVE

The Project Site is currently zoned C2-2D. The "D" Limitation limits the allowable floor area at the Project Site to 3:1 for each building or structure, but the total floor area of the entire Project Site shall not exceed a FAR of 1.5:1. The Project Applicants are requesting to amend the "D" Limitation to permit a FAR of 3.0 averaged across the Project Site. Thus, the purpose of this Alternative is to identify the environmental impacts of development at the Project Site to the maximum level permitted by the Project Site's existing zoning. Based on a FAR of 1.5, a total of 2,748,621 square feet of development could occur at the Project Site under this alternative. This amount of development is 324,335 square feet less than the Proposed Project (i.e., an approximately 11 percent reduction in floor area), but an increase of 1,731,880 square feet over existing conditions.

Alternative 2 would include approximately 125,385 square feet of office space, a 337-room hotel totaling approximately 291,845 square feet, and 809 new dwelling units (464 condominiums and 345 apartments) totaling approximately 1,039,777 square feet. Similar to the Proposed Project, parking for the Existing Zoning Alternative would be provided within multi-level parking facilities and two surface parking lots. Access points for this Alternative would also remain the same as the Proposed Project. Like the Proposed Project, this Alternative would incorporate a landscape plan that would provide landscaped pedestrian walkways with landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter. The architectural design and materials, signage and lighting would be expected to be similar to the Proposed Project. This Alternative would be designed to incorporate similar measures to those included in the Proposed Project that would reduce energy and water usage.

b) IMPACT SUMMARY OF ALTERNATIVE

Alternative 2 principally differs from the Proposed Project in that Alternative 2 is consistent with the density permitted under the Project Site's existing zoning, whereas a zone change is needed to implement the Proposed Project. Impacts generated by Alternative 2 would be similar to those of the Proposed Project with regard to aesthetics (light/glare); cultural resources (historic resources and archaeological and paleontological resources); geology and soils; hazards and hazardous materials; hydrology and water quality; and land use compatibility. Alternative 2 impacts with regard to aesthetics (visual character, views, and shading) would be reduced compared to the Proposed Project due to a reduction in building height and overall development square footage. The overall reductions in development under Alternative 2 (i.e., less square footage, and fewer employees and residents) would result in reducing Proposed Project impacts with regard to air quality, greenhouse gas emissions, noise, population growth, public services (fire protection, police, schools, recreation and parks, and libraries), transportation and circulation, and utilities (wastewater, water supply, solid waste, and energy) but would not reduce to a less than significant level the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic. The reduced development that would occur under Alternative 2 would also result in greater impacts with regard to land use plans, employment related population growth, and housing. Impacts would be greater with regard to these issues because Alternative 2 would generate fewer employees and housing units as well as implementing key land use policies to a lesser degree than under the Proposed Project (e.g., support/create mixed-use developments within existing regional centers in close proximity to transit and infrastructure, contributing towards achieving the City's RHNA goal, etc.).

In summary, Alternative 2 would reduce the Proposed Project's impacts across some environmental issues; but would not reduce the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to a less than significant level. Thus, Alternative 2 would result in significant impacts for the same issues as the Proposed Project. In addition, Alternative 2 would have greater impacts with regard to land use plans, employment related population growth, and housing.

c) FINDINGS

With this Alternative, the new environmental impacts projected to occur from development would be generally similar to those projected to occur under the Proposed Project, although some would be reduced. However, this Alternative does not meet the objectives of the Proposed Project to the same extent as the Proposed Project, in particular, because it

provides for reduced levels of employment and housing growth, particularly in an area adjacent to existing and forthcoming major transit lines. Because the Existing Zoning Alternative would be inferior to the Proposed Project with respect to achieving some Project objectives and would furthermore not reduce any significant impacts to a level of insignificance, this Alternative is infeasible and is less desirable than the Proposed Project. Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Existing Zoning Alternative described in the EIR.

d) RATIONALE FOR FINDINGS

The Existing Zoning Alternative principally differs from the Proposed Project in that Alternative 2 is consistent with the density permitted under the Project Site's existing zoning, whereas a zone change and height district change is needed to implement the Proposed Project to revise the D and Q conditions applicable to the Project Site. Under the Existing Zoning Alternative, on-site development totals 2,748,621 square feet, a reduction of 324,335 square feet compared to the Proposed Project. All amenities, such as enhanced transit accessibility, landscaped pedestrian walkways, landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter would be the same as under the Proposed Project. Due to the similarities to the Proposed Project, Alternative 2 would achieve all of the Project objectives to a similar extent as the Proposed Project, with two exceptions: Alternative 2's ability to complement and add definition to the Baldwin Hills Crenshaw Plaza Mall would be reduced by the reduced building heights; and Alternative 2's reduced amount of commercial, residential and office space would result in less job generation and fewer housing opportunities on the Project Site. Alternative 2 would achieve all design objectives, but some would be achieved to a lesser extent than the Proposed Project. While Alternative 2 would be consistent with the Project Site's existing zoning, Alternative 2 would introduce fewer residential uses and job opportunities and, therefore, would provide less density adjacent to existing and forthcoming major transit lines. Similarly, due to the reduction in density, the long-term jobs generated by Alternative 2 would be reduced in comparison to those of the Proposed Project. Overall, the Existing Zoning Alternative would be inferior to the Proposed Project with respect to achieving all of the important Project objectives. It furthermore would not reduce any of the Proposed Project's significant and unavoidable impacts to a level of insignificance. Therefore, this Alternative is infeasible and less desirable than the Proposed Project and is rejected for the reasons stated above.

e) REFERENCE

For a complete discussion of impacts associated with Alternative 2, please see Section V, Alternatives to the Proposed Project, of the Draft EIR.

3. ALTERNATIVE 3: 25 PERCENT REDUCED PROJECT ALTERNATIVE

a) DESCRIPTION OF ALTERNATIVE

A 25 percent reduction in the net new development included in the Proposed Project would occur under the 25 Percent Reduced Project Alternative. Alternative 3 would retain the mall building, which includes 833,077 square feet and 75,000 square feet of movie theater uses. In addition, Alternative 3 would include approximately 352,920 square feet of retail/restaurant uses, approximately 112,156 square feet of office space, a 300-room hotel totaling

approximately 259,875 square feet, and 721 new dwelling units (413 condominiums and 308 apartments) totaling approximately 925,875 square feet. Similar to the Proposed Project, parking for the 25 Percent Reduced Project Alternative would be provided within multi-level parking facilities and two surface parking lots. Access points for this Alternative would also remain the same as the Proposed Project. Like the Proposed Project, this Alternative would incorporate a landscape plan that would provide landscaped pedestrian walkways with landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter. The architectural design and materials, signage and lighting would be expected to be similar to the Proposed Project. This Alternative would be designed to incorporate similar measures to those included in the Proposed Project that would reduce energy and water usage.

b) IMPACT SUMMARY OF ALTERNATIVE

Impacts generated by Alternative 3 would be similar to those of the Proposed Project with regard to aesthetics (light/glare); cultural resources (historic resources and archaeological and paleontological resources); geology and soils; hazards and hazardous materials; hydrology and water quality; and land use compatibility. Alternative 3 impacts with regard to aesthetics (visual character, views, and shading) would be reduced compared to the Proposed Project due to the reduction in building height and overall development square footage. The overall reductions in development under Alternative 3 (i.e., less square footage, and fewer employees and residents) would result in reducing Proposed Project impacts with regard to air quality, greenhouse gas emissions, noise, population growth, public services (fire protection, police, schools, recreation and parks, and libraries), transportation and circulation, and utilities (wastewater, water supply, solid waste, and energy). However, impacts to construction and operational air quality, construction noise, and operational traffic would not be reduced to less than significant levels. The reduced development that would occur under Alternative 3 would also result in greater impacts with regard to land use plans, employment related population growth, and housing. Impacts would be greater with regard to these issues because Alternative 3 would generate fewer employees and housing units as well as implementing key land use policies to a lesser degree than what would occur under the Proposed Project (e.g., support/create mixed-use developments within existing regional centers in close proximity to transit and infrastructure, contributing towards achieving the City's RHNA goal, etc.).

In summary, Alternative 3 would reduce the Proposed Project's impacts across some environmental issues but would not reduce the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to a less than significant level. Thus, Alternative 3 would result in significant impacts for the same issues as the Proposed Project. In addition, Alternative 3 would have greater impacts with regard to land use plans, employment related population growth, and housing.

c) FINDINGS

With this Alternative, the new environmental impacts projected to occur from development would be generally similar to those projected to occur under the Proposed Project, although some would be reduced. However, this Alternative does not meet the objectives of the Proposed Project to the same extent as the Proposed Project, in particular, because it provides for reduced levels of employment and housing growth, particularly in an area adjacent to existing and forthcoming major transit lines. Because the 25 Percent Reduced Project Alternative would be inferior to the Proposed Project with respect to achieving all Project objectives and would furthermore not reduce any significant impacts to a level of

insignificance, this Alternative is infeasible and is less desirable than the Proposed Project. Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the 25 Percent Reduced Project Alternative described in the EIR.

d) RATIONALE FOR FINDINGS

The 25 Percent Reduced Project Alternative would reduce all proposed uses by 25 percent. The 25 Percent Reduced Project Alternative includes 352,920 square feet of retail/restaurant uses, 112,256 square feet of office space, a 300-room hotel totaling approximately 259,875 square feet, and 721 new dwelling units (413 condominiums and 308 apartments) totaling approximately 925,875 square feet. All amenities, such as enhanced transit accessibility, landscaped pedestrian walkways, landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter would be the same as under the Proposed Project. Due to the similarities to the Proposed Project, Alternative 3 would achieve all of the Project objectives to a similar extent as the Proposed Project, with two exceptions: Alternative 3's ability to complement and add definition to the Baldwin Hills Crenshaw Plaza Mall would be reduced by the reduced building heights, and Alternative 3's reduced amount of commercial, residential and office space would result in fewer employees and residents on the Project Site. Alternative 3 would also achieve all of the design objectives, but some would be achieved to a lesser extent than the Proposed Project. Alternative 3 would incorporate similar sustainable design features. However, Alternative 3 would introduce fewer residential uses and job opportunities and, therefore, would provide less density adjacent to existing and forthcoming major transit lines. Similarly, due to the reduction in density, the long-term jobs generated by Alternative 3 would be reduced in comparison to the Proposed Project. Overall, the 25 Percent Reduced Project Alternative would be inferior to the Proposed Project with respect to achieving all of the important Project objectives. It furthermore would not reduce any of the Proposed Project's significant and unavoidable impacts to a level of insignificance. Therefore, this Alternative is infeasible and less desirable than the Proposed Project and is rejected for the reasons stated above.

e) REFERENCE

For a complete discussion of impacts associated with Alternative 3, please see Section V, Alternatives to the Proposed Project, of the Draft EIR.

4. ALTERNATIVE 4: 50 PERCENT REDUCED PROJECT ALTERNATIVE

a) DESCRIPTION OF ALTERNATIVE

A 50 Percent reduction in net new development proposed by the Proposed Project would occur under the 50 Percent Reduced Project Alternative. Specifically, Alternative 4 would include approximately 269,960 square feet of retail and restaurant uses, approximately 76,312 square feet of office space, a 200 room hotel totaling approximately 173,250 square feet, and 481 new dwelling units (276 condominiums and 205 apartments) totaling approximately 617,250 square feet. Similar to the Proposed Project, parking for the 50 Percent Reduced Project Alternative would be provided within multi-level parking facilities and two surface parking lots. Access points for this Alternative would also remain the same as the Project. Existing use square footage would remain under Alternative 4, as under the Proposed Project. Like the Proposed Project, this Alternative would incorporate a landscape plan that would provide landscaped

pedestrian walkways with landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter. The architectural design and materials, signage and lighting would be expected to be similar to the Proposed Project. This Alternative would be designed to incorporate similar measures to those included in the Proposed Project that would reduce energy and water usage.

b) IMPACT SUMMARY OF ALTERNATIVE

Impacts generated by Alternative 4 would be similar to those of the Proposed Project with regard to aesthetics (light/glare); cultural resources (historic resources and archaeological and paleontological resources); geology and soils; hazards and hazardous materials; hydrology and water quality; and land use compatibility. Alternative 4 impacts with regard to aesthetics (visual character, views, and shading) would be reduced compared to the Proposed Project due to the reduction in building height and overall development square footage. The overall reductions in development under Alternative 4 (i.e., less square footage, and fewer employees and residents) would result in reducing Proposed Project impacts with regard to air quality, greenhouse gas emissions, noise, population growth, public services (fire protection, police, schools, recreation and parks, and libraries), transportation and circulation, and utilities (wastewater, water supply, solid waste, and energy). Alternative 4 would not reduce the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to less than significant levels. The reduced development that would occur under Alternative 4 would also result in greater impacts with regard to land use plans, employment related population growth, and housing. Impacts would be greater with regard to these issues because Alternative 4 would generate fewer employees and housing units as well as implementing key land use policies to a lesser degree than what would occur under the Proposed Project (e.g., support/create mixed-use developments within existing regional centers in close proximity to transit and infrastructure, contributing towards achieving the City's RHNA goal, etc.).

In summary, Alternative 4 would reduce the Proposed Project's impacts across some environmental issues; but would not reduce the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to a less than significant level. Thus, Alternative 4 would result in significant impacts for the same issues as the Proposed Project. In addition, Alternative 4 would have greater impacts with regard to land use plans, employment related population growth, and housing.

c) FINDINGS

With this Alternative, the new environmental impacts projected to occur from development would be generally similar to those projected to occur under the Proposed Project, although some would be reduced. However, this Alternative does not meet the objectives of the Proposed Project to the same extent as the Proposed Project, in particular, because it provides for reduced levels of employment and housing growth, particularly in an area adjacent to existing and forthcoming major transit lines. Because the 50 Percent Reduced Project Alternative would be inferior to the Proposed Project with respect to achieving all Project objectives and would furthermore not reduce any significant impacts to a level of insignificance, this Alternative is infeasible and is less desirable than the Proposed Project. Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the 50 Percent Reduced Project Alternative described in the EIR.

d) RATIONALE FOR FINDINGS

The 50 Percent Reduced Project Alternative would reduce all proposed uses by 50 percent. The 50 Percent Reduced Project Alternative includes 269,960 square feet of retail/restaurant uses, 76,312 square feet of office space, a 200 room hotel totaling approximately 173,250 square feet, and 481 new dwelling units (276 condominiums and 205 apartments) totaling approximately 617,250 square feet. All amenities, such as enhanced transit accessibility, landscaped pedestrian walkways, landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter would be the same as under the Proposed Project. Due to the similarities to the Proposed Project, Alternative 4 would achieve all of the Project objectives to a similar extent as the Proposed Project, with two exceptions: Alternative 4's ability to complement and add definition to the Baldwin Hills Crenshaw Plaza Mall would be reduced by the reduced building heights, and Alternative 4's reduced amount of commercial, residential and office space would result in less employees and residents on the Project Site. Alternative 4 would also achieve all of the design objectives, but some would be achieved to a lesser extent than the Proposed Project. However, Alternative 4 would introduce fewer residential units and job opportunities and, therefore, provide less density adjacent to existing and forthcoming major transit lines. Similarly, due to the reduction in density, the long-term jobs generated by Alternative 4 would be reduced in comparison to the Proposed Project. Overall, the 50 Percent Reduced Project Alternative would be inferior to the Proposed Project with respect to achieving all of the important Project objectives. It furthermore would not reduce any of the Proposed Project's significant and unavoidable impacts to less than significant. Therefore, this Alternative is infeasible and less desirable than the Proposed Project and is rejected for the reasons stated above.

e) REFERENCE

For a complete discussion of impacts associated with Alternative 4, please see Section V, Alternatives to the Proposed Project, of the Draft EIR.

5. ALTERNATIVE 5: LAND USE (RESIDENTIAL TO OFFICE CONVERSION) ALTERNATIVE

a) DESCRIPTION OF ALTERNATIVE

The Land Use (Residential to Office Conversion) Alternative would not result in a reduction in overall square footage proposed under the Proposed Project. However, the 74 residential units proposed for the southern portion of the Project Site would be converted to 99,719 square feet of office space. As such, Alternative 5 would include approximately 435,879 square feet of retail and restaurant uses, approximately 247,719 square feet of office space, a 400 room hotel totaling approximately 346,500 square feet, and 887 new dwelling units (477 condominiums and 410 apartments) totaling approximately 1,134,781 square feet. Like the Proposed Project, Alternative 5 would retain the mall building, which includes 833,077 square feet and approximately 75,000 square feet of movie theater uses and parking for Alternative 5 would be provided within multi-level parking facilities and two surface parking lots. Access points for this Alternative would also remain the same as the Proposed Project. Like the Proposed Project, this Alternative would incorporate a similar landscape plan to that of the Proposed Project that would provide landscaped pedestrian walkways with landscaped pedestrian-oriented open space areas, and streetscape improvements along the Project Site's perimeter. The architectural design and materials, signage and lighting would be expected to be similar to the Proposed Project. This

Alternative would be designed to incorporate similar measures to those included in the Proposed Project that would reduce energy and water usage.

b) IMPACT SUMMARY OF ALTERNATIVE

Impacts under Alternative 5 would be generally similar to those of the Proposed Project due to the similarity in building height and overall development square footage. However, under Alternative 5, some of the Proposed Project's residential uses would be replaced with additional office space, thereby resulting in more on-site employees and fewer on-site residents.

Impacts generated by Alternative 5 would be similar to those of the Proposed Project with regard to aesthetics (visual character, views, light, glare, and shading); air quality (construction); cultural resources (historic resources and archaeological and paleontological resources); geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (fire protection); and transportation and circulation. Alternative 5 impacts with regard to population growth, public services (police protection, recreation and parks, and libraries), and utilities and services (solid waste) would be reduced compared to the Proposed Project due to the reduction in housing that would occur under Alternative 5. The increase in on-site employment and commercial development coupled with the reduction in housing that would occur under Alternative 5 would also result in greater impacts with regard to air quality (operations); greenhouse gas emissions; housing; schools; and utilities and services (wastewater, water supply, and energy).

In summary, Alternative 5 would have impacts that are generally similar to those of the Proposed Project. While impacts under Alternative 5 would be reduced for some environmental issues, Alternative 5 would not reduce the Proposed Project's significant and unavoidable impacts to construction and operational air quality, construction noise, and operational traffic to a less than significant level. Thus, Alternative 5 would result in significant impacts for the same issues as the Proposed Project. In addition, Alternative 5 would have greater impacts with regard to air quality (operations); greenhouse gas emissions; housing; schools; and utilities and services (wastewater, water supply, and energy).

c) FINDINGS

With this Alternative, the new environmental impacts projected to occur from development would be generally similar to those projected to occur under the Proposed Project, although some would be reduced, others would be greater. In addition, this Alternative does not meet the objectives of the Proposed Project to the same extent as the Proposed Project, in particular, because it provides for reduced levels of housing growth, particularly in an area adjacent to existing and forthcoming major transit lines. Because the Land Use (Residential to Office Conversion) Alternative would be inferior to the Proposed Project with respect to achieving all Project objectives and would furthermore not reduce any significant impacts to a level of insignificance, this Alternative is infeasible and is less desirable than the Proposed Project. Pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible the Land Use (Residential to Office Conversion) Alternative described in the EIR.

d) RATIONALE FOR FINDINGS

The Land Use (Residential to Office Conversion) Alternative would convert 74 of the residential units proposed for the southern portion of the Project Site to 99,719 square feet of office space. The Land Use (Residential to Office Conversion) Alternative, similar to the

Proposed Project includes 435,879 square feet of retail/restaurant uses and a 400-room hotel totaling approximately 346,500 square feet. However, under Alternative 5, the amount of office development, compared to the Proposed Project, is increased from 148,000 square feet to 247,719 square feet, and residential development is decreased from 961 dwelling units (551 condominiums and 410 apartments) under the Proposed Project to 887 dwelling units (477 condominiums and 410 apartments) under Alternative 5. Due to the substantial similarities to the Proposed Project, Alternative 5 would achieve the majority of the Project objectives, but some would be achieved to a lesser extent than the Proposed Project. In addition, Alternative 5 would introduce fewer residential uses and, therefore, would provide less density adjacent to existing and forthcoming major transit lines in comparison to the Proposed Project. Overall, the Land Use (Residential to Office Conversion) Alternative would be inferior to the Proposed Project with respect to achieving all of the important Project objectives. It furthermore would not reduce any of the Proposed Project's significant and unavoidable impacts to a level of insignificance. Therefore, this Alternative is infeasible and less desirable than the Proposed Project and is rejected for the reasons stated above.

e) REFERENCE

For a complete discussion of impacts associated with Alternative 5, please see Section V, Alternatives to the Proposed Project, of the Draft EIR.

6. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in the Draft EIR and the Revised Draft EIR as well as the Original Project, the range of feasible Alternatives includes the following: (a) Original Project; (b) No Project Alternative (Continuation of Existing On-Site Use); (c) Existing Zoning Alternative; (d) 25 Percent Reduced Project Alternative; (e) 50 Percent Reduced Project Alternative; and (f) Alternative 5—Land Use (Residential to Office Conversion) Alternative.

The No Project Alternative – Continuation of Existing On-Site Use (Alternative 1) would be the environmentally superior alternative, as this Alternative would have less impact relative to the Proposed Project than the other evaluated alternatives and would eliminate the significant unavoidable impacts of the Proposed Project. CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative needs to be selected as environmentally superior. In accordance with this procedure, the 50 Percent Reduced Project Alternative (Alternative 4) would be the environmentally superior alternative. Alternative 4 would have relatively fewer environmental impacts than the Proposed Project and the other alternatives, other than the No Project Alternative (Continuation of Existing On-Site Use); although Alternative 4 would not eliminate any of the significant unavoidable impacts of the Proposed Project. Alternative 4 is distinguished from the Proposed Project, since it would provide half of the total amount of new development proposed for the Project Site under the Proposed Project.

D. ALTERNATIVE REJECTED AS BEING INFEASIBLE

In accordance with State CEQA Guidelines,[7] the Lead Agency initially considered, but ultimately rejected, the feasibility of evaluating an Alternative Site Alternative. Under this alternative, the Proposed Project would be constructed on an alternate site within the area. While development of the Proposed Project on an alternative site was considered, this alternative was rejected because of a lack of available properties in the vicinity of the Project Site that would satisfy the objectives for the Proposed Project. Most importantly, a primary and fundamental objective of the Proposed Project is to rehabilitate and revitalize the existing Project Site and Baldwin Hills Crenshaw Mall as the centerpiece of a pedestrian-friendly and transit-friendly mixed-use community. Therefore, a primary Project Objective could not be met under an Alternative Site Alternative. Additionally, development of the Proposed Project on an alternative site within the area would be infeasible because the Project Applicant does not own or control any other comparable sites. As such, the Alternative Site Alternative was rejected from further consideration and was not examined in detail in this EIR.

X. FINDINGS REGARDING GENERAL IMPACT CATEGORIES

A. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines states:

> Discuss the ways in which the original project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Proposed Project would provide a mixed-use development with a net increase of approximately 331,838 square feet of retail/restaurant uses, 143,377 square feet of office uses, 346,500 square feet of hotel uses providing up to 400 hotel rooms, and 1,234,500 square feet of residential uses in up to 961 residential units, consisting of up to 551 condominiums and 410 apartments. The Proposed Project would foster economic growth and revitalize an already developed but underutilized location in the West Adams–Baldwin Hills–Leimert Community Plan's core by converting the Project Site from an underutilized and aging commercial area to an active live-work-play environment located along the Crenshaw transit corridor. The Proposed Project's 961 residential dwelling units would

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[7] State CEQA Guidelines Section 15126.6(f)(2).

increase the permanent population on the Project Site by approximately 2,518 persons and the Proposed Project's commercial uses would increase on-site employment by 1,760 jobs. The Proposed Project would not cause direct population or housing growth that exceeds projected population growth for the City's Community Plan area or SCAG's City of Los Angeles Subregion. Cumulative population and housing growth would also fall within SCAG's forecasted population growth for the Los Angeles Subregion as well as the projected population and housing growth for the Community Plan area.

It should be noted that the assumptions applied in the Proposed Project's cumulative analysis are highly conservative. Even with the improving economic climate, it is very unlikely that all of the related projects will be approved, built, and fully occupied. In addition, as an infill development in a major employment hub that is served by existing and forthcoming transit, the Proposed Project would assist the City in meeting its fair share of the regional housing need, provide new housing opportunities, and conform with City policies supporting higher density, compact, infill housing development that adds to the City's housing supply, while meeting other "smart growth" objectives.

The increased on-site residential population and on-site employees would patronize local businesses and services both on the Project Site and within the Project Site vicinity, which would incrementally foster economic growth. The Proposed Project's demand for off-site commercial goods and services is anticipated to be met by the existing retail, service and other resources already located within proximity to the Project Site or by the Proposed Project itself. Further, as the Proposed Project combines new housing with new jobs in an effort to balance the jobs-housing balance in the West Adams–Baldwin Hills–Leimert Community Plan area, it would not have an adverse impact on the ratio of jobs to households in SCAG's City of Los Angeles Subregion. In addition, the hotel, office, retail, and restaurant components of the Proposed Project would be unlikely to induce substantial population or housing growth in the Project area. Further, any housing relocation that may occur as a result of a future employee taking a job at the Project Site would result in a less than significant indirect growth inducing impact in the context of the City of Los Angeles Subregion.

In addition, the Proposed Project would be a mixed-use project that would be located in a highly urbanized area of the City of Los Angeles that is served by existing roadways, utilities and other infrastructure, including well-established bus transit lines as well as newer and forthcoming light rail transit lines. The Proposed Project would not require the extension of roadways and other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. Furthermore, the existing infrastructure in the Project vicinity would have adequate capacity to serve the Proposed Project. Utility connections to the Project Site would not require the expansion of local distribution infrastructure or capacity-enhancing alterations to existing facilities. With respect to roadway infrastructure, the Proposed Project would not introduce any new public roadways and the construction of driveways to access the Project Site from the adjacent roadways would facilitate vehicular circulation associated with the Proposed Project and would not induce growth. Community service facilities (e.g., police, fire, schools, parks, and libraries) would not be expanded as a result of the Proposed Project. As a result, the development of the Proposed Project would not accelerate development in an undeveloped area, indirectly induce substantial growth as a result of the extension of infrastructure, or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan.

B. SIGNIFICANT IRREVERSIBLE IMPACTS

CEQA Guidelines Section 15126.2(c) provides that:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The types and level of development associated with the Proposed Project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project Site.

Construction of the Proposed Project would require consumption of resources that are not replenishable or which may renew slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics) and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. To reduce construction-related waste, the Proposed Project's construction contractor would only contract for waste disposal services with a company that recycles construction-related wastes. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced. Water, which is a limited, slowly renewable resource, would also be consumed during Project construction. However, given the temporary nature of construction activities, water consumption during Proposed Project construction would result in a less than significant impact on water supplies. Furthermore, the Proposed Project's use of construction vehicles and equipment would require the consumption of non-renewable fossil fuels such as diesel fuel, gasoline, natural gas, and oil. As with other resources consumed during construction, the consumption of non-renewable fossil fuels for energy use would occur on a temporary basis during construction. It should also be noted that through retention and reuse of existing uses on the Project Site, the Proposed Project would result in a lesser degree of consumption on non-renewable resources.

Proposed Project operation would continue to expend similar nonrenewable resources that are currently consumed within the City of Los Angeles and on-site. These include energy resources such as electricity, fossil fuels, and water. Energy resources would be used for heating and cooling buildings, transportation, and building lighting. Fossil fuels are primary energy sources for Project construction and operation. This existing, finite energy source would thus be incrementally reduced. Under Title 24, Part 6 of the California Code of Regulation, conservation practices limiting the amount of energy consumed by the Proposed Project is required. In addition, the Proposed Project would incorporate a variety

of green building elements, including the use of efficient water management techniques and other sustainability features. Furthermore, the City of Los Angeles would also require the Proposed Project to conduct energy efficient planning and construction. Despite conservation practices and guidelines in energy conservation, the commitment to the use of nonrenewable resources would be long-term.

Proposed Project construction and operation would commit the use of slowly renewable and nonrenewable resources and would limit the availability of these resources and the Project Site for future generations or for other uses during the life of the Proposed Project. However, the continued use of such resources during Proposed Project operation would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment.

The commitment of resources required for the type and level of development associated with the Proposed Project would limit the availability of these resources for future generations for other uses during the operation of the Proposed Project. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles region.

XI. OTHER CEQA CONSIDERATIONS

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Proposed Project, that the Draft EIR and the Revised Draft EIR which were circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential Proposed Project and cumulative environmental impacts: Aesthetics (Visual Character, Views, Light, Glare, and Shading); Air Quality; Greenhouse Gas Emissions; Cultural Resources (Historic Resources and Archaeological and Paleontological Resources); Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population, Housing, and Employment; Public Services (Fire Protection, Police, Schools, Recreation and Parks, and Libraries); Transportation and Circulation; and Utilities and Services (Wastewater, Water Supply, Solid Waste, and Energy). Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes, and the Growth Inducing Impacts of the Proposed Project. The significant environmental impacts of the Proposed Project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the Proposed Project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding both the Draft EIR and Revised Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.

4. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of the significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. Similarly, the Department of City Planning reviewed the comments received on the Revised Draft EIR and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts. The Lead Agency has based its actions on a full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

5. The Final EIR documents changes to the Draft EIR and the Revised Draft EIR and accordingly provides additional information that was not included in the Draft EIR or the Revised Draft EIR. Having reviewed the information contained in the Draft EIR, the Revised Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

   - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the Proposed Project would have significant impacts or more severe impacts not disclosed in the Draft EIR or the Revised Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the Proposed Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR and the Revised EIR.

   - The City has thoroughly reviewed the public comments received regarding the Proposed Project and the Final EIR as they relate to the Proposed Project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption, and has determined that recirculation of the EIR is not required.

   - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the Proposed Project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alterative not included in the Final EIR.

6. The mitigation measures identified for the Original Project were included in the Draft EIR, Revised Draft EIR, and Final EIR. As revised, the final mitigation measures for the Proposed Project are described in the Mitigation Monitoring Program ("MMP"). Each of the mitigation measures identified in the MMP is incorporated into the Proposed Project. The City finds that the impacts of the Proposed Project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

7. CEQA requires the Lead Agency approving a project to adopt a Mitigation Monitoring Program ("MMP") or the changes to the project, which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the Proposed Project and has been designed to ensure compliance with such measures during implementation of the Proposed Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

8. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Proposed Project.

9. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.

10. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

11. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the Proposed Project.

12. The EIR is a Project EIR for purposes of environmental analysis of the Proposed Project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the Proposed Project by the City and the other regulatory jurisdictions.

XII. STATEMENT OF OVERRIDING CONSIDERATIONS

The EIR has identified unavoidable significant impacts that would result from implementation of the Proposed Project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that

significant adverse environmental effects have been identified in the EIR, which cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the EIR, and documents and materials that constitute the record of proceedings.

The following impacts are not mitigated to a less than significant level for the Project, as identified in the EIR: Air Quality (during construction and operations and under cumulative conditions), Noise (during construction), and Traffic (during operations and under cumulative conditions). It is not feasible to mitigate these impacts to a less than significant level.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the Proposed Project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the Proposed Project, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Proposed Project against the Proposed Project's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The below stated reasons summarize the benefits, goals and objectives of the Proposed Project, and provide the detailed rationale for the benefits of the Proposed Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Proposed Project justify adoption of the Proposed Project and certification of the completed EIR. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Proposed Project, and (ii) justifies adoption of the Proposed Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Proposed Project would be sufficient to override the significant environmental impacts of the Proposed Project.

1. Implementation of the Proposed Project will develop a new mixed-use community of mutually supportive uses including as employment, housing, retail, recreation and entertainment, so as to decrease vehicle dependency, encourage pedestrian activity and use of alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, and foster a strong sense of community.

2. Implementation of the Proposed Project will bring infill development to an urbanized area, concentrating new development, housing, and jobs within walking distance of several Metro bus lines and DASH service as well as the Metro Crenshaw (when completed an expected ridership of 16,000) and Expo light rail lines. While the project results in unavoidable impacts to traffic (11 intersections, 3 site access locations and cut-through traffic in up to 6 neighborhoods), the Proposed Project will encourage residents and employees to use transit as well as visitors to the site, and includes space and funding for an on-site mobility hub offering secure bicycle storage, shuttle services, and vehicle sharing programs, including conventional and electric bicycles, scooters, and cars. In addition to the mobility hub, the Proposed Project would have an onsite portal to the immediately adjacent Crenshaw Metro station, and help to bolster transit capacity and service by purchasing a new bus for Metro and helping to fund operations and maintenance for the new bus.

3. Implementation of the Proposed Project will create a new community whose design and development are consistent with and enhance the existing Baldwin Hills Crenshaw Plaza, retaining historic structures, including the existing Macy's store building and the building formerly occupied by Wal-Mart and revitalizing the shopping center to become a

mixed-use commercial, office, hotel, and residential project. The entirety of the enclosed mall would be retained, and new buildings would be constructed to increase the amount of retail and commercial services provided on-site. Many of the existing anchor tenants and retailers would be retained on site and would, upon completion of the Proposed Project, benefit from the increased commercial and residential uses and site activity.

4. Implementation of the Proposed Project would lead to renovation of existing retail areas and development of new land uses with pedestrian amenities including enhanced pedestrian circulation, paths, seating, thematic elements, landscaping, street trees, pedestrian lights, marked street crossings along a network of pedestrian routes, modern storefronts, a cohesive pedestrian/circulation plan, with a consistent architectural and signage theme all of which create a sense of place and generate increased activity on-site, attracting new customers and visitors, thereby promoting the economic vitality and decreasing the spread of blight and deterioration. Ground level experience would include street trees, landscaping, and/or a green wall system to promote pedestrian activity.

5. Implementation of the Proposed Project would add approximately 821,715 square feet of net new commercial retail, entertainment, office, and hotel uses that would generate approximately 1,760 net new permanent job opportunities, while preserving 2,100 existing jobs within the shopping center.

6. Implementation of the Proposed Project would serve to convert a sprawling surface parking area to a master plan including commercial and residential uses that introduces new sources of taxes and increases property tax, transient occupancy tax, and retail sales tax revenues to the West Adams - Baldwin Hills - Leimert Park area and for the City of Los Angeles. In addition, the proposed project would represent one of the only and most significant investments in this portion of the City of Los Angeles, providing much needed investment, housing, jobs and related benefits.

7. Implementation of the Proposed Project would introduce up to 961 new, high-quality housing units to help meet market demand for housing, promoting individual choice in type, quality, price, and location of housing within the West Adams - Baldwin Hills- Crenshaw - Leimert Park community, and contributing a notable amount of new housing to meet the projected housing growth demand in the community.

8. Implementation of the Proposed Project's sustainability features (use of recycled materials, reducing water consumption, and reducing greenhouse gas emissions), mixed-use environment, location, and proximity to transit will reduce air quality emissions through a reduction in vehicle trips and vehicle miles traveled and reduced energy, solid waste, and water usage. Implementation of the Proposed

9. Implementation of the Proposed Project will take place in an established urban area with no environmentally sensitive habitat, and that is served by existing infrastructure that will minimize the need for the development of new infrastructure and make more efficient use of existing facilities.

10. Implementation of the Proposed Project would ensure design features, including transitional massing, landscaped buffering and setbacks are introduced to promote compatibility with surrounding land uses. The land uses proposed would also be compatible and complementary to the existing uses in the area, including the surrounding residential, office and commercial uses, as well as the existing and new transit services along the Metro Crenshaw Transit Corridor.

11. Implementation of the Proposed Project will include new contemporary buildings of varying heights and scale while also preserving and rehabilitating the existing historic Broadway and May Company buildings onsite. New buildings would be designed and oriented to be pedestrian scaled and would be compatible with other newer or recently renovated buildings in the area, and with the character and scale of surrounding areas including established single-family neighborhoods.