LOS ANGELES DEPARTMENT OF CITY PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

2ND ADDENDUM

TCE MAIN, LOS ANGELES PROJECT
Alameda District Specific Plan Addendum No. 2

Environmental Case: ENV-1994-58-EIR-ADD2
State Clearinghouse No.: 94031006

Project Location: 800-908 N. Main Street and 1081-1087 N. Vignes Street, Los Angeles, California, 90012

Community Plan Area: Central City North

Council District: 14 - Kevin de León

Project Description: New construction of a phased, two-building mixed-use project consisting of a 4-story commercial building ("West Phase") and a 7-story mixed-use building ("East Phase") including 124 dwelling units (100% restricted affordable for Lower Income Households excluding managers' units), 40 residential parking spaces at- and above-grade and subterranean commercial parking (Option 1: 2 subterranean levels and up to 175 spaces, Option 2: 1 subterranean level and 135 spaces).

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1.0 INTRODUCTION

The City of Los Angeles (City), as Lead Agency under the California Environmental Quality Act (CEQA), has prepared this second addendum to the Alameda District Specific Plan Final Environmental Impact Report (ADSP FEIR), which was certified by the City of Los Angeles in 1996 (State Clearinghouse #94031006). In accordance with CEQA, this second addendum analyzes and discloses environmental effects that might reasonably result from proposed changes to development under the Alameda District Specific Plan (ADSP) approved in 1996.[1] The proposed changes to development under the ADSP are referred to as the TCE Main, Los Angeles Project (Project) within this second addendum. This second addendum incorporates by reference the environmental analysis completed for the ADSP, including the original Initial Study, Draft and Final EIR, and all technical appendices and reports produced for the ADSP, including those provided in the first addendum to the ADSP dated June 2018. The Project would be constructed within the Terminal Annex site, a subarea analyzed as part of the ADSP. This site is described below as it was presented in the ADSP as well as the proposed changes to the site as part of this Project. This second addendum and attached supporting documents have been prepared to determine whether and to what extent the ADSP FEIR remains sufficient to address the potential environmental impacts of the Project, or whether a supplemental or subsequent environmental documentation is required under CEQA. The discussion under each environmental topic is focused on 1) relevant analysis, impacts, and mitigation measures in the ADSP FEIR; 2) relevant regulation pertinent to the comparison of the Project to the ADSP FEIR where applicable; and 3) impacts specific to the Project. Each section concludes with a determination of whether implementation of the Project would result in new significant impacts or a substantial increase in the severity of previously identified impacts in the ADSP FEIR.

1.1 PROJECT LOCATION

The subject property is improved with the California Endowment (“TCE”) campus, a health-focused non-profit, which includes offices, a conference center and both surface and subterranean parking. The Applicant proposes to merge and resubdivide an approximate 168,336 square foot (3.86 acres) area of land (the “Subdivision Site”), which is currently improved with the two surface parking lots accessory to TCE which provide 155 spaces. The Applicant also proposes to redevelop approximately an 86,036 square foot (sq ft) area within the Subdivision Site (the “Development Site”). The Applicant also proposes to create a new pedestrian connection within the TCE surface parking lot, which combined with the Development Site, comprises the Project Site.

The Project Site is located at the southeast corner of N. Vignes Street and N. Main Street (800-908 N. Main Street and 1081-1087 N. Vignes Street), west of Rosabell Street (a private street); assessor’s parcel numbers 5409-015-024 (only a portion), 5409-015-025, and 5409-015-026. The Project Site is in a mixed-use area of Los Angeles, which includes industrial, transportation, office, commercial, and multifamily residential uses. The General Plan land use designation of the Project Site is Regional Center Commercial, and the Project Site is zoned Alameda District Specific Plan Zone (ADP-RIO). The Project Site and adjacent parcels to the east and south are within the Alameda District Specific Plan area, which generally covers the area between N.

[1] Los Angeles City Planning is currently updating the Downtown Community Plan (DTLA 2040), which will combine the areas of the currently existing Central City and Central City North Community Plans into one plan area. While the ADSP is within the DTLA 2024 Community Plan Area, no changes to the ADSP are contemplated as part this update process.

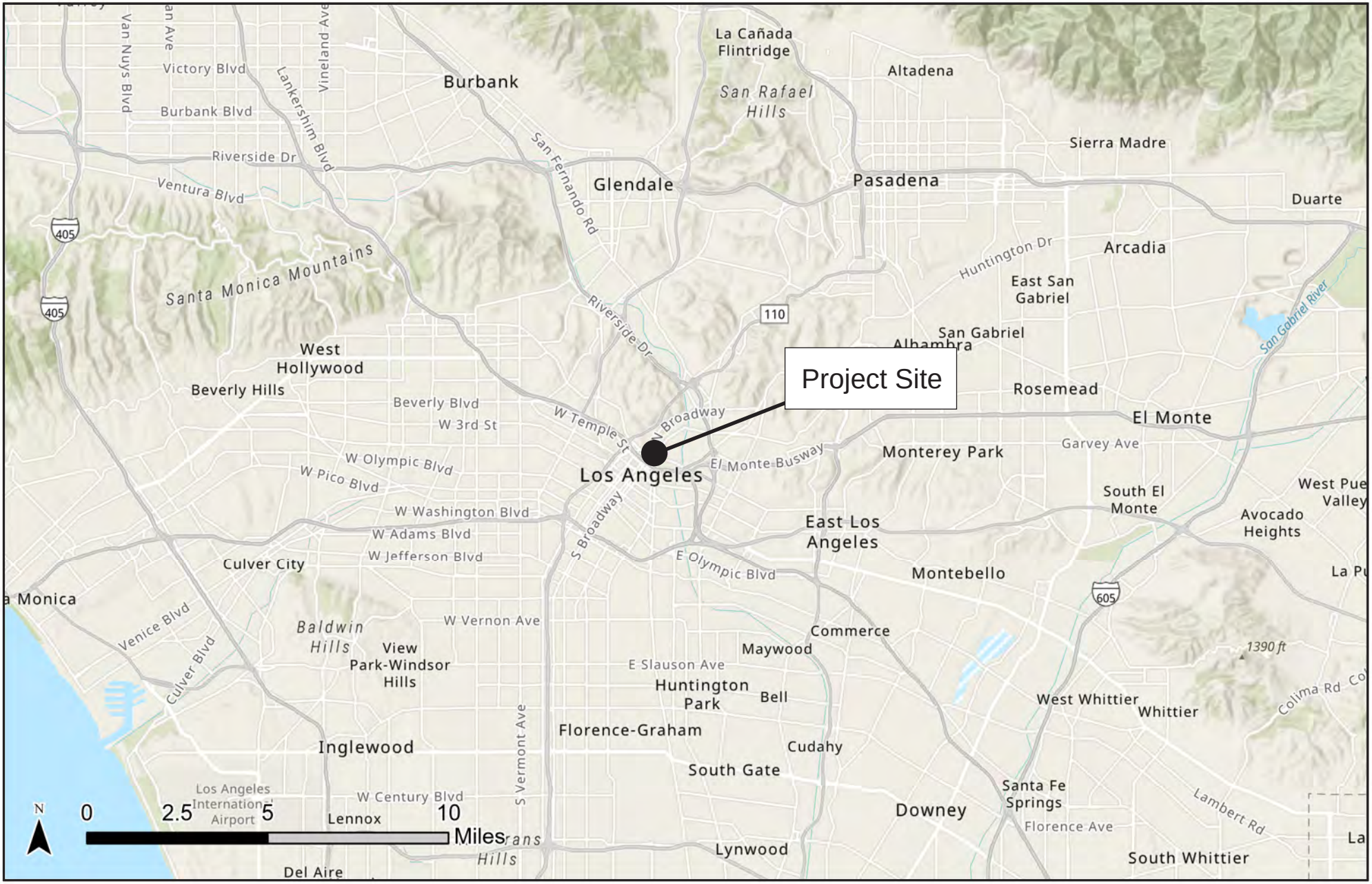
Alameda Street to the west, Vignes Street to the north and east, and the Santa Ana Freeway (US-101) to the south; adjacent parcels to the west and north are not located in the Specific Plan Area and are zoned M3 and C2. See **Figures 1** and **2**.

1.2 PREVIOUSLY APPROVED PROJECT

The ADSP area is approximately 70.5 acres in size and consists of two subareas: the 52.3-acre Union Station property and the 18.2-acre United States Postal Service Terminal Annex property (Terminal Annex). The ADSP is organized into two phases of land use development: Phase I and Buildout Phase. Phase I consists of 3,362,000 square feet (sq ft) of new and adaptive reuse development, with contemplated uses including commercial and government office space within the Terminal Annex subarea, and retail, commercial and government office space, and a museum on the Union Station subarea. The Buildout Phase consists of up to an additional 7,500,000 sq ft of new development for a total of 10,405,000 sq ft of commercial and government office, hotel and conference center, residential, and retail, land uses (Phase I and Buildout Phase combined). New development on the Terminal Annex subarea is anticipated to total 3,450,000 sq ft and development on the Union Station property is anticipated to total 6,955,000 sq ft. The ADSP identified the anticipated development locations, uses, building heights, and building square footages within the two subareas. See **Figure 3** through **Figure 6**.

The ADSP permitted mixed uses including office, residential, retail, hotel, theater, stadium, and entertainment uses. It thus permits the Project components, within the constraints and parameters established by the ADSP, to respond to the needs and demands of the Southern California economy. In order to ensure flexibility for the future, and to ensure that the mix of uses analyzed is the maximum envelope consideration of uses, the approved ADSP FEIR considered a high impact component, office, as constituting the majority of new space. The Project proponents contemplated, however, that other uses permitted by the ADSP may be substituted for portions of the office component. Accordingly, to ensure that potential environmental impacts of any such project modifications had been adequately analyzed, while at the same time providing flexibility, the ADSP FEIR incorporated an Equivalency Review Process.

The Equivalency Review Process assumed that the maximum thresholds of environmental impact which were analyzed, mitigated and addressed by the approved document would not be exceeded. Modification to the Project would require review and approval, supported by technical data as necessary, by the appropriate City departments. Modifications that exceed a threshold which was analyzed, mitigated and addressed by the ADSP FEIR would require additional environmental analysis. In accordance with CEQA, this second Addendum to the ADSP FEIR analyzes and discloses environmental effects that might reasonably result from proposed changes to development under the original ADSP approved in 1996.



SOURCE: Esri, 2024

FIGURE **1**

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Regional Location

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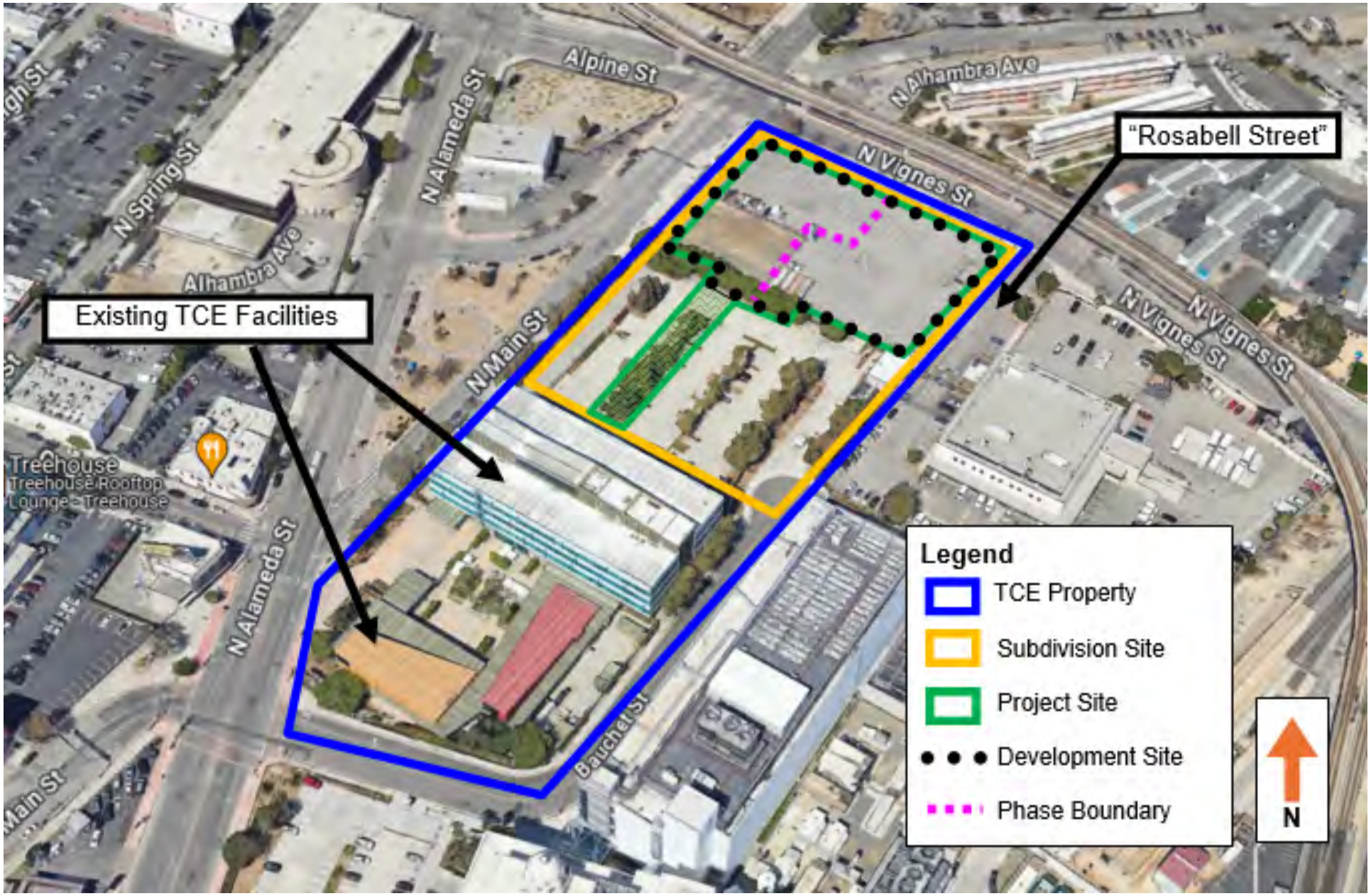

SOURCE: Google Earth, 2024

FIGURE **2**

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Aerial Photograph of the Project Site

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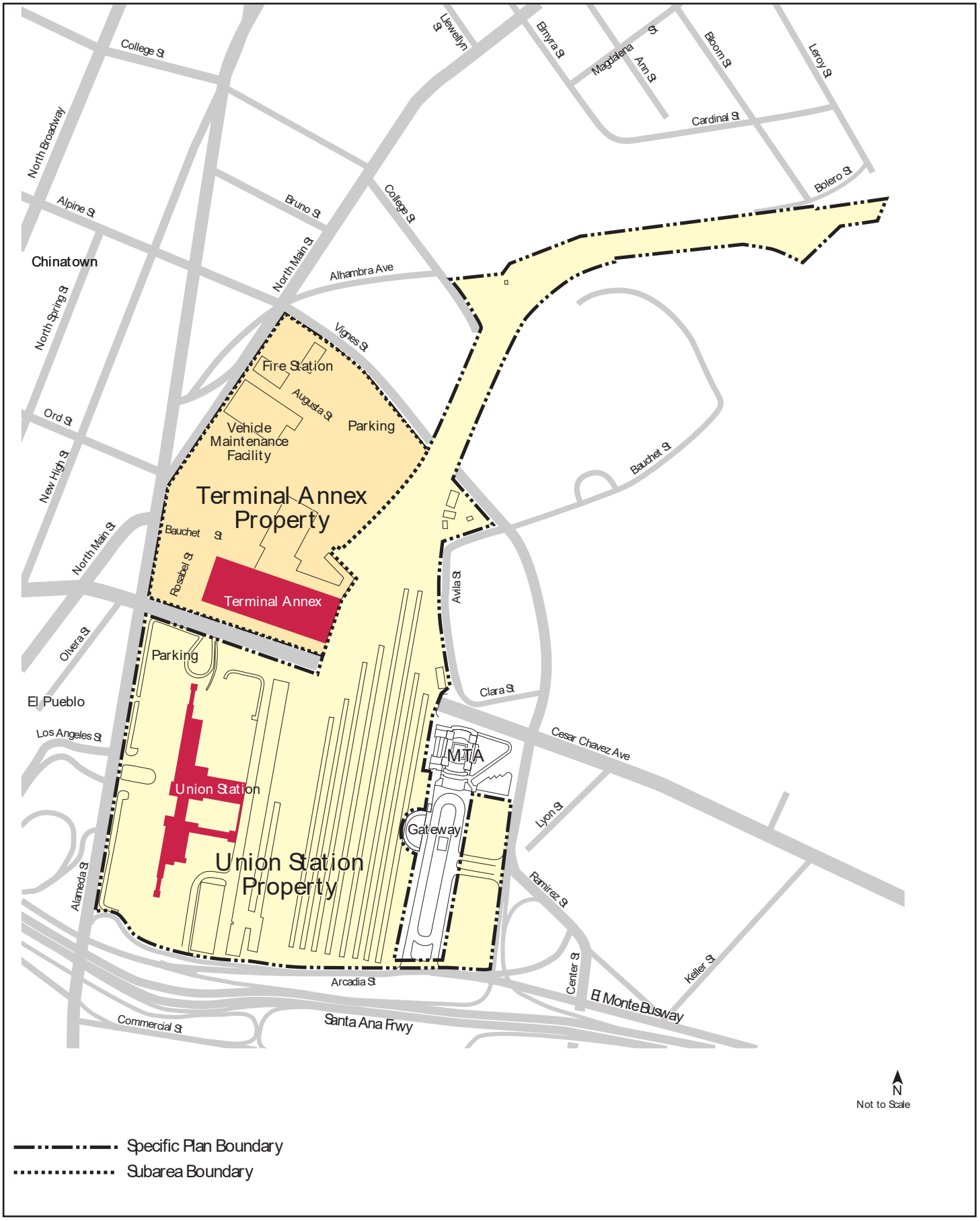

SOURCE: City of Los Angeles, 2024

FIGURE **3**

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Alameda District Specific Plan

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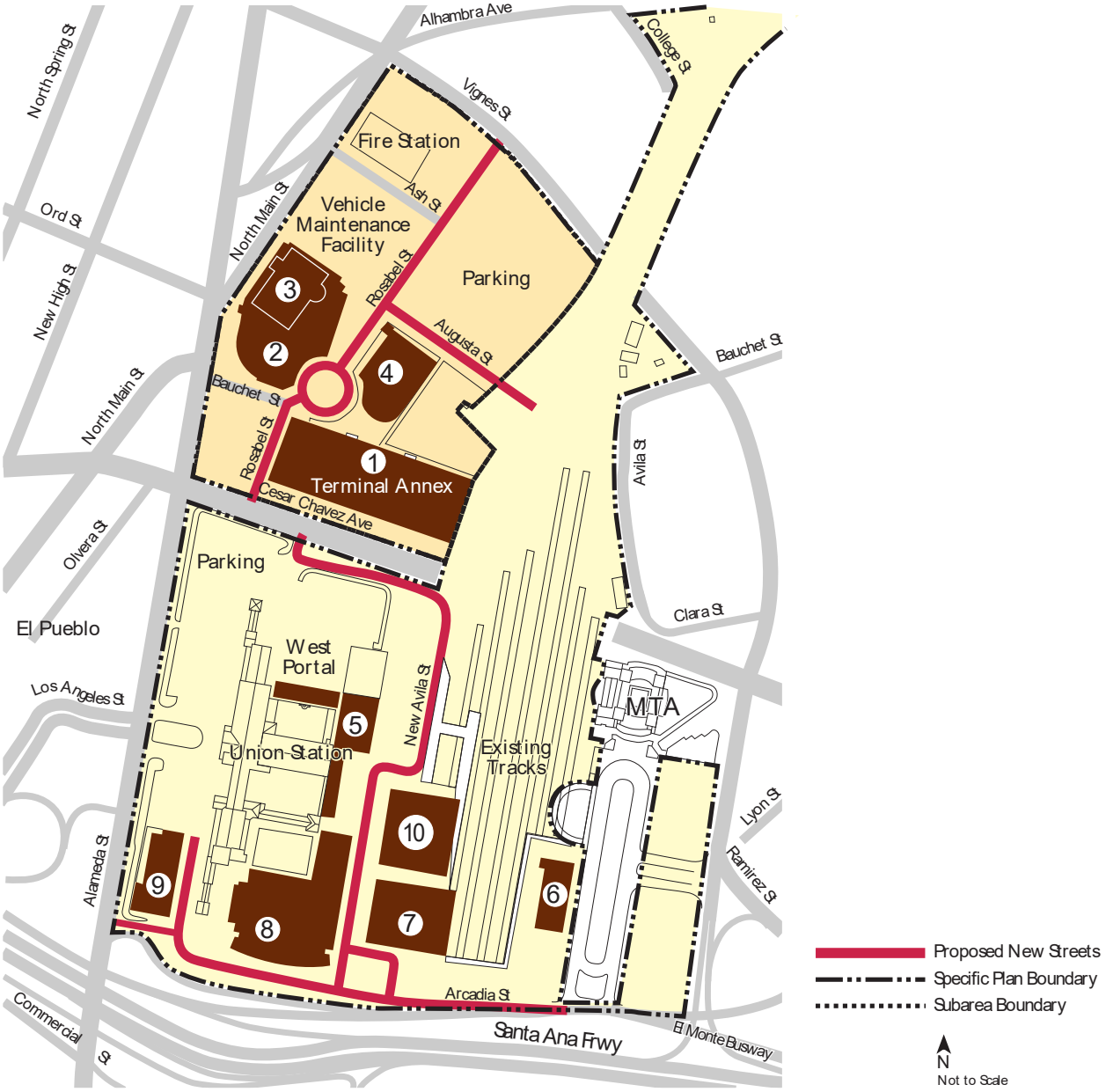

Terminal Annex Property			
Bldg No	Use	Floor Area (Sq. Ft.)	Height
1	Government Office	457,000[1]	4 Stories/ 80 Ft.
2	Commercial Office	200,000[1]	4 Stories/ 60 Ft.
3	Commercial Office	250,000[1]	8 Stories/ 120 Ft.
4	Commercial Office	400,000[1]	12 Stories/ 180 Ft.

Union Station Property			
Bldg No	Use	Floor Area (Sq. Ft.)	Height
5	Stand-Alone Retail	100,000	3 Stories/ 60 Ft.
6	Government Office	255,000[2]	11 Stories/ 160 Ft.
7	Commercial Office	620,000[2]	25 Stories/ 350 Ft.
8	Government Office	540,000	12 Stories/ 180 Ft.
9	Museum	70,000	3 Stories/ 45 Ft.
10	Government Office	470,000[2]	16 Stories/ 240 Ft.

[1] Includes aggregate 100,00 sq. ft. of in-building retail space
[2] Includes aggregate 95,000 sq. ft. of in-building retail space

Phase I New and Adaptive Reuse Development Total: 3,362,000 Sq. Ft.

SOURCE: City of Los Angeles, 2024

FIGURE **4**

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Phase I Projects

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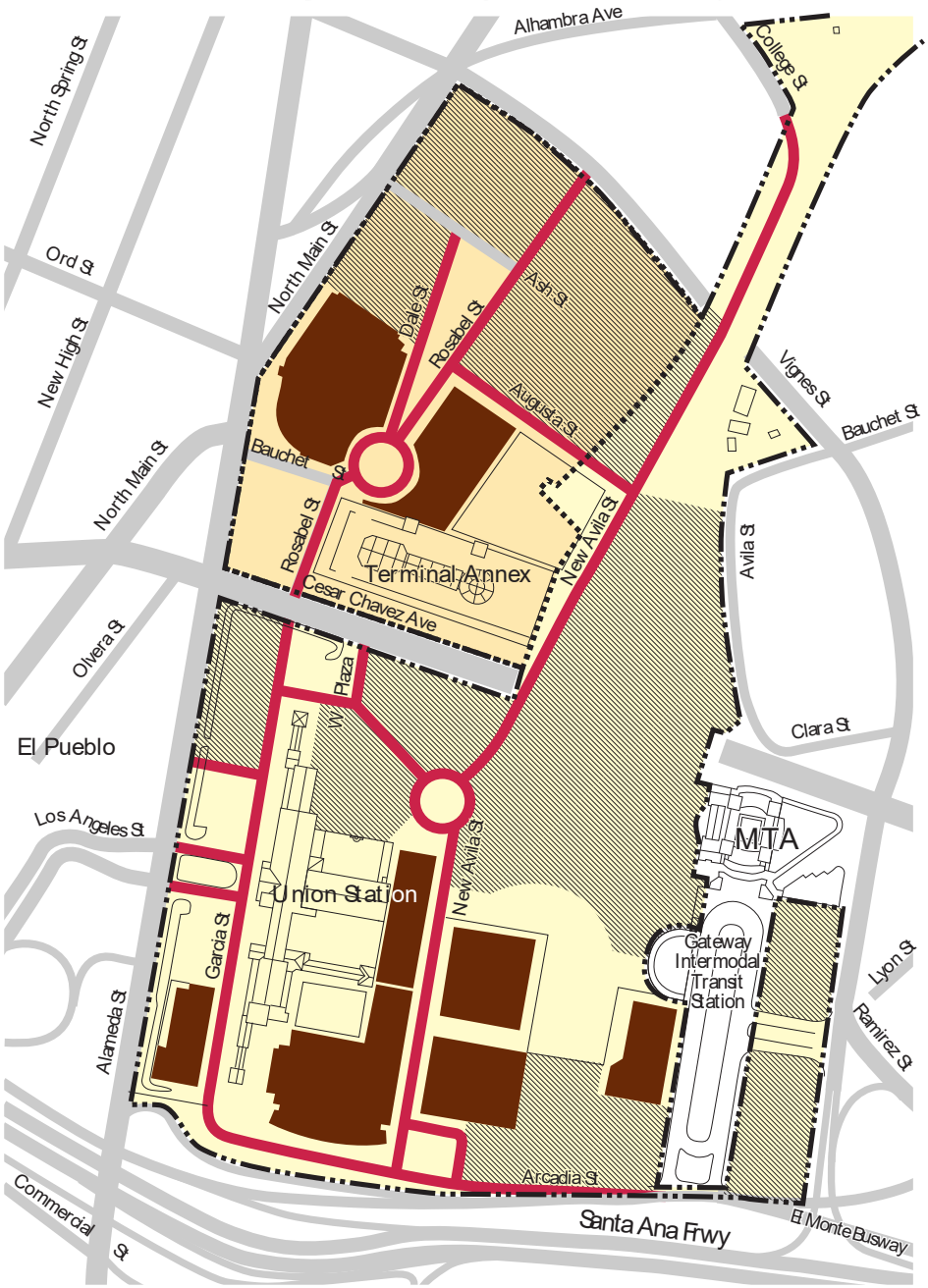

Phase II (Terminal Annex & Union Station)	
Use	Floor Area (Sq. Ft.)
Commercial Office	4,480,000[1]
Government Office	1,520,000[1]
Hotel (750 Rooms) and Conference Center	1,050,000
Residential (300 Units)	300,000
Stand-Alone Retail	150,000

[1] Includes aggregate 220,000 sq. ft. of in-building retail space

Phase II Total: 7,500 ,000 Sq. Ft.

Total Specific Plan New and Adaptive Reuse Development: 10,862,00 Sq. Ft.
With Phase I Alternative: 10,527,000 Sq. Ft.

Proposed Buildings For Phase I

Proposed Areas for Buildout Phase

Proposed New Streets

Specific Plan Boundary

Subarea Boundary

SOURCE: City of Los Angeles, 2024

FIGURE **5**

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Phase II Projects

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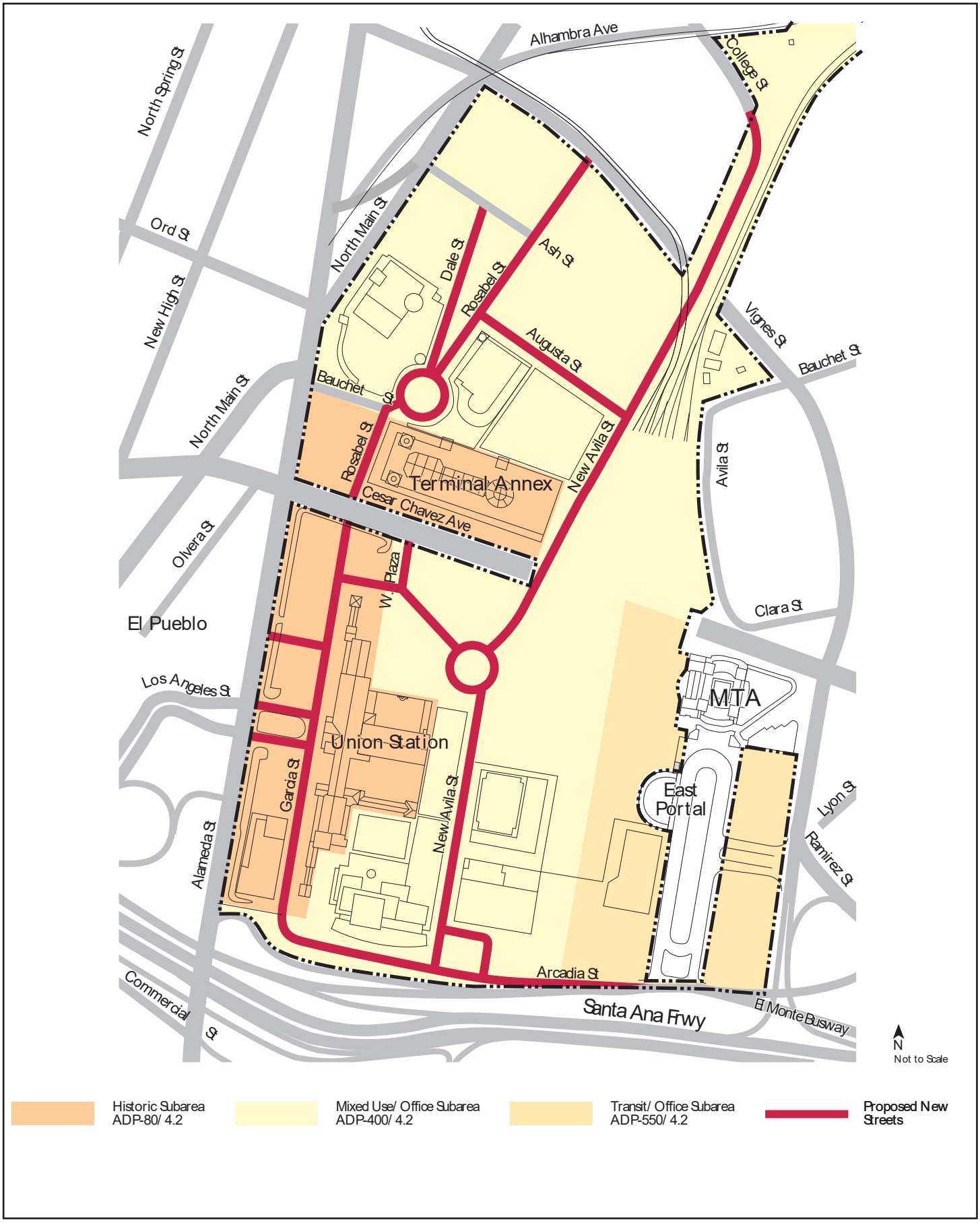

SOURCE: City of Los Angeles, 2024

FIGURE 6

Specific Plan Subareas

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1.3 SUMMARY OF PROJECT CHANGES ADDRESSED IN THIS SECOND ADDENDUM

The Project analyzed in this second addendum is proposed by Linc Housing Corporation, 3590 Elm Avenue, Long Beach, CA 90807. The Project would be developed in two phases, an east (housing) phase and a west (commercial) phase.

1) East Phase – This phase will consist of the construction of a 124-unit mixed-use affordable housing development (100% restricted affordable for Lower Income Households excluding managers' units) that would be seven stories above grade, consisting of a two-story podium constructed of fire resistive non-combustible materials (masonry or concrete) containing commercial tenant improvement space (community care space), with five stories of affordable residential apartments above, along with 40 residential parking spaces at- and above-grade within the podium level.
2) West Phase - This contemplates the construction of a commercial building for community care facilities and a common courtyard area, over two levels of subterranean parking providing up to 175 spaces. The "gather+spirit" area of the building will be two stories and the "mind+body" area of the building will be four stories.

Other site-specific Project components include new landscaping, an entrance ('Welcome') plaza, community gathering spaces ('Dignity' plaza, lawn spaces) Many of these project components were not specifically anticipated under the ADSP FEIR and are described in detail in **Section 2.0 Project Background and Description.**

1.4 TERMINAL ANNEX PHASE I DEVELOPMENT SUMMARY

As discussed above, the adopted ADSP includes 10,862,000 sq ft of new and adaptive reuse development to be built out in two phases on two properties, the Union Station Property and the Terminal Annex Property. Phase I proposed 3,362,000 sq ft of development, 1,307,000 sq ft proposed for the Terminal Annex site, 2,055,000 sq ft for the Union Station site. As shown in **Table 1.1-1**, there is 521,045 sq ft of remaining development potential for the Terminal Annex Property.

Table 1.1-1
Terminal Annex Phase I Development Summary[2]

Allowable Square Footage Analyzed in the ADSP FEIR	Existing Square Footage 2023	Net Remaining Square Footage
457,000	12,000	
400,000	459,004	
350,000	125,491	
100,000	7,016	
	7,196	

2 Refer to **Alameda District Specific Plan Development History** table, prepared by Craig Lawson & Co., LLC, for complete details. See **Appendix E.**

Allowable Square Footage Analyzed in the ADSP FEIR	Existing Square Footage 2023	Net Remaining Square Footage
	135,830	
	39,418	
1,307,000	**785,955**	**521,045**

As discussed above and in greater detail in **Section 2.0, Project Background and Description**, the Project proposes to construct a maximum of 193,493 sq ft, leaving an additional 327,552 sq ft remaining development capacity on the Terminal Annex Property as analyzed in the ADSP FEIR for Phase I.

1.5 STATUTORY BACKGROUND

In accordance with the California Environmental Quality Act (CEQA), when a Lead Agency considers further discretionary approval on a previously approved project, the Lead Agency is required to consider if the previously certified CEQA document provides an adequate basis for rendering a decision on the proposed discretionary action. In summary, when making such a decision, the Lead Agency must consider any changes to the project or its circumstances that have occurred and any new information that has become available since the project's CEQA document was certified.

In accordance with *State CEQA Guidelines* Sections 15162–15164, prior to approving further discretionary action, and depending on the situation, the Lead Agency must either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation. More specifically, *State CEQA Guidelines* Section 15162 states:

a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

    1) Substantial changes are proposed in the project that will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

    2) Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or

    3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

        A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

D) Mitigation measures or alternatives that are considerably different from those analyzed in the previous Mitigated Negative Declaration (MND) would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the *State CEQA Guidelines* explains that a lead agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

a) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

b) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

Finally, Section 15164 of the *State CEQA Guidelines* states that, "The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

1.6 REVISIONS TO THE CEQA GUIDELINES

The California Natural Resources Agency adopted revisions to the *CEQA Guidelines* that became effective on December 28, 2018, which was adopted after preparation of the 1997 ADSP FEIR. These revisions are reflected in the discussion of each topic in this Addendum (see Chapter 3) and are summarized below. The revisions to the *CEQA Guidelines* were adopted largely to create efficiencies and to align the *CEQA Guidelines* with California appellate court and Supreme Court decisions. The revisions that are most applicable to the 1997 ADSP FEIR are those associated with changes to Appendix G.

Appendix G of the *CEQA Guidelines* contains a sample initial study format. The purpose of an initial study is to assist lead agencies in determining whether a project may cause a significant impact on the environment. To help guide that determination, Appendix G asks a series of questions in the form of a checklist regarding a range of environmental resources and potential impacts. The Planning Department in preparing CEQA clearances as a general matter uses Appendix G as the initial threshold of significance, unless indicated otherwise, and supplements the threshold question as necessary or desirable to comply with CEQA to analyze significant impacts to the environment, such as the use of South Coast Air Quality Management District (SCAQMD) thresholds for air quality impacts. When the Appendix G checklist was originally developed, it contained only a handful of questions. Over time, the list of questions has grown in response to increasing awareness of the effects of development on the environment. Currently, the sample checklist contains 89 questions divided into 20 categories of potential impacts.

The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity, and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to the Appendix G is provided below by environmental topic. The following summarizes the changes to Appendix G, and other updates to CEQA and the *CEQA Guidelines*, since the preparation and/or certification of the 1997 ADSP FEIR. Where relevant, the changes to Appendix G and other updates to the Guidelines will be addressed in the analysis in Chapter 3.

Aesthetics

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

Agriculture and Forestry Resources

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

Air Quality

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

Biological Resources

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

Cultural Resources

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

Energy

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

Geology and Soils

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

Greenhouse Gas Emissions

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

Hazards and Hazardous Materials

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

Hydrology and Water Quality

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

Land Use and Planning

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

Mineral Resources

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

Noise

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

Population and Housing

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

Public Services

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

Recreation

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

Transportation

Checklist questions were combined and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. A checklist question regarding airport traffic safety was eliminated, as airport traffic safety is already addressed under the hazards questions. A checklist question was revised to add "geometric" for clarity. All of the topics in these questions are addressed in **Section 3.17, Transportation and Traffic**. In addition, a checklist question was revised to address consistency with *CEQA Guidelines* Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The City adopted a VMT methodology on July 30, 2019. The traffic discussion included herein, has therefore been prepared using the City's adopted VMT methodology.

Tribal Cultural Resources

Assembly Bill 52 (AB 52) went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The NOP for the Alameda District Specific Plan EIR was released on February 1, 1994, and therefore, the lead agency was not required to comply with the requirements of AB 52. AB 52 also required an update to Appendix G of the *CEQA Guidelines* to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The issues related to tribal cultural resources are addressed within **Section 3.18, Tribal Cultural Resources**.

Utilities and Service Systems

These checklist questions were revised to reduce redundancy. Specifically, a checklist question was eliminated, as wastewater treatment was already addressed in a former question. In addition, checklist questions were combined to address all infrastructure types in one question and to include the addition of telecommunications. A checklist question regarding water supply was also updated to clarify that the analysis of water supply should include reasonably foreseeable future

development during normal, dry and multiple dry years. Checklist questions regarding solid waste impacts were also clarified. All of the topics in these questions are addressed in **Section 3.19, Utilities and Service Systems**.

Wildfire

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

1.7 MODIFIED ENVIRONMENTAL CHECKLIST FORM

Section 3.0 of this second addendum is a checklist of the environmental analysis questions from Appendix G of the *CEQA Guidelines*. The purpose of the checklist addendum is to evaluate the impacts of the changed Project and compare them with the impacts identified in the ADSP FEIR. The conclusions in the checklist correspond with the criteria identified in *CEQA Guidelines* Section 15162 that require preparation of subsequent CEQA documentation when project changes, changed circumstances, or new information of substantial importance is discovered that may result in a new significant impact or substantial increase in the severity of a previously identified significant effect.

A “no” response on the checklist does not necessarily mean that there are no potential impacts relative to the environmental resource category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the ADSP FEIR. Likewise, these environmental resource categories may be answered with a “no” in the checklist if the revised project does not introduce changes that would result in a modification to the conclusion of the certified ADSP FEIR.

1.8 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

The following categories are presented in a table for each environmental topic:

A. Discussed in prior EIR? This column provides a “yes” or “no” answer to whether the Appendix G question was addressed in the ADSP FEIR.

B. Do the proposed changes involve new significant impacts not previously identified? Pursuant to Section 15162, subdivision (a)(1), of the *State CEQA Guidelines*, this column indicates whether changes represented by the revised project will result in new significant environmental impacts not previously identified or mitigated by the ADSP EIR, or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

C. New circumstances involving new significant impacts? Pursuant to Section 15162, subdivision (a)(2), of the *State CEQA Guidelines*, this column indicates whether there have been substantial changes with respect to the circumstances under which the project is undertaken, that will require major revisions to the ADSP EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

D. New information involving new significant impacts? Pursuant to Section 15162, subdivision (a)(3), of the *State CEQA Guidelines*, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 1996 ADSP FEIR was certified as complete, would result in of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. If the additional analysis completed as part of this environmental review finds that the conclusions of the ADSP FEIR remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered "no" and no additional environmental document (supplemental or subsequent EIR) is required.

E. Final EIR mitigation measures required? This column indicates whether the mitigation measures in the ADSP FEIR would apply to the proposed changes evaluated in this second addendum to the ADSP FEIR in order to minimize and reduce impacts.

F. New mitigation measures required? This column indicates whether new mitigation measures not identified in the ADSP FEIR would apply to the proposed changes evaluated in this second addendum to the ADSP FEIR in order to minimize and reduce impacts.

1.9 MITIGATION MEASURES FROM THE ADSP FEIR

The ADSP FEIR identifies mitigation measures that would reduce the potentially significant impacts of the ADSP. These mitigation measures were required as part of the approval process, incorporated into the ADSP FEIR, and are listed in **Table 1.1-2**. These mitigation measures will continue to be implemented as regulatory compliance measures as applicable and appropriate with respect to the proposed Project.

Table 1.1-2
ADSP FEIR Mitigation Measures

No.	Mitigation Measure
Artificial Light	
Phase I	
K.1.1.a	Exterior lighting, including pedestrian lighting, shall be shielded to reduce the amount of direct lighting escaping the site.
K.1.1.b	Parking structures shall be designed so as to shield exterior areas from vehicle headlights and interior parking structure lighting, to the extent feasible.
K.1.1.c	Pole-mounted lighting fixtures on pedestrian paths will utilize cut-off technology to reduce glare.
K.1.1.d	Necessary building floodlighting will be shielded and designed to eliminate spill over glare
K.1.2	Exterior building surfaces, particularly those facing heavily traveled roadways, shall utilize low-reflectivity materials.
Buildout Phase	
K.1.3	Mitigation measures K.1.1.a through K.1.1.d, and K.1.2, shall also be implemented for the Buildout Phase of the proposed project.

No.	Mitigation Measure
Meteorology (Wind)	
Phase I	
F.2.1	Should significant impacts occur to outdoor dining, seating, or similar stationary uses, the project shall incorporate wind screening measures such as shrubs, screens, and lattices. Wind screening should be designed to be most effective in reducing local wind speeds generated from southwest winds, the prevailing winds.
BUILDOUT PHASE	
F.2.2	Should Buildout Phase of the project result in LS significant impacts to outdoor dining, seating, or similar use, mitigation measure F.2.1 shall also be implemented as necessary for Buildout Phase of the proposed project.
F.2.3.a	Where feasible, closely spaced (100 feet or less), similar sized high-rise development shall be configured in order to mitigate any significant impacts from wind speeds exceeding 11 mph.
F.2.3.b	If mitigation measure F.2.3.a cannot be incorporated into the future project design and a closely spaced northeast/southwest orientation of similar sized buildings is incorporated into Phase II, then wind speeds exceeding 11 mph should be reduced through screening, including, but not limited to, the closely packed grouping of uniformly sized trees with dense foliage.
Natural Light (Shade/Shadow)	
Phase I & Buildout Phase	
K.2.1	Shadow impacts are directly attributable to the building height, massing, and location. Although no significant off-site impacts are associated with Phase I development, a significant unavoidable on-site impacts to south-facing Union Station Passenger Terminal design elements is anticipated as well as to on-site open spaces and plaza areas.
K.2.2	Refer to Mitigation Measure K.2.1.
Buildout Phase	
K.2.3	Buildout Phase impacts will be conclusively determined during the design phase of Phase II, when design and placement of buildings will be finalized. At that time, additional review of specific on-site development shall be conducted to determine any design features or modifications which may reduce impacts to surrounding buildings, onsite residential and hotel developments, as well as open spaces and plaza areas.
K.2.4 – K.2.7	Refer to Mitigation Measure K.2.3.
Aesthetics	
Phase I	
Compliance with the Historic Resources, Parks and Open Space, and Urban Design Elements of the ADP will reduce, but not eliminate, significant viewshed and on-site character impacts. Additional mitigation measures are not feasible.	
Buildout Phase	
Compliance with the Historic Resources, Parks and Open Space, and Urban Design Elements of the ADP will reduce, but not eliminate, significant viewshed and on-site character impacts. Additional mitigation measures are not feasible.	
Air Quality	
Phase I	
F.1.1.a	Prior to issuance of a grading permit, the project proponent shall demonstrate to the City of Los Angeles the actions that will be taken to comply with SCAQMD Rule 402, which requires that there be no dust impacts off-site sufficient to cause a nuisance, and SCAQMD Rule 403, which restricts visible emissions from construction. Specific measures will include moistening soil prior to grading, daily watering of exposed surfaces or treating with soil conditioner to stabilize the soil; washing truck tires and covering loads of dirt transported off-site; cessation of grading during periods of high winds over 25 miles per hour, and paving, coating or seeding graded areas at the earliest possible time after soil disturbance.

No.	Mitigation Measure
F.1.1.b	All construction equipment will be maintained in peak operating condition so as to reduce operational emissions.
F.1.1.c	Equipment will use low-sulfur diesel fuel.
F.1.1.d	Electric equipment will be used to the maximum extent feasible.
F.1.1.e	Trucks will limit idling.
F.1.1.f	To the maximum extent feasible, construction activities that affect traffic flow will be restricted to off-peak hours, i.e. between 7:00 p.m. and 6:00 a.m. and between 10:00 a.m. and 3:00 p.m.
F.1.1.g	Contractors will be required to provide assistance to long term construction workers in finding carpools or alternate transportation.
F.1.1.h	Haul truck routes and staging areas shall avoid residential streets, and to the extent feasible, streets adjacent to schools.
F.1.1.i	Construction workers will be advised of protective apparatus to wear when there is a potential for exposure to odors or from asbestos or other toxins during demolition.
F.1.1.j	Soil remediation programs shall be designed to minimize the release of contaminants.
F.1.1.k	Project design will include pre-coasted or uncoated materials for exterior surfaces to the extent feasible.
F.1.1.l	Project design will include low-emitting interior coatings to the maximum extent feasible.
F.1.2.a	Project design will incorporate energy-saving features throughout the project, including low emission water heaters, central water heating systems, and built-in energy efficient appliances.
F.1.2.b	Parking and pedestrian areas will be planted with trees to ensure shading and prevent heat buildup.
F.1.2.c	Building managers to the greatest extent possible will assist local tenants comply with SCAQMD Regulation XV, as applicable.
Buildout Phase	
F.1.3	Implementation of Mitigation Measures F.1.1.a through F. 1.1.1 for the Buildout Phase will reduce construction emissions, but emissions, while unknown at this time, could be significant after mitigation.
F.1.4.a	Project design will incorporate energy-saving features throughout the project, including low emission water heaters, central water heating systems, and built-in energy efficient appliances.
F.1.4.b	Parking and pedestrian areas will be planted with trees to insure shading and prevent heat buildup.
F.1.4.c	Building managers to the greatest extent possible will assist local tenants comply with SCAQMD Regulation XV, as applicable.
Archaeological Resources/Paleontological Resources/Historical Resources	
Archaeological Resources	
Phase I & Buildout Phase	
In order to mitigate identified potentially significant impacts to less than significant levels, the following mitigation measures will be required during all construction of new development under the ADP. The measures listed below will allow for the recovery of archaeological remains, should any additional remains be encountered by excavation in the ADP area, along with associated geologic and geographic site data, these should then be preserved in a museum repository, where they would be available for future study by qualified investigators. As appropriate, these measures shall be conducted prior to and during excavation for subterranean structures below the artificial fill. With the exception of laboratory tasks and reporting requirement, no mitigation measures will be required after excavation has been completed. Mitigation recommendations are offered as options subject to implementation, depending upon whether or not significant cultural resources are actually encountered, once groundbreaking begins. The most appropriate forms of cultural resources mitigation, as a means of ameliorating the potential adverse impacts resulting from proposed construction on the ADP, involve both additional archival work and fieldwork.	

No.	Mitigation Measure
Project Pre-Construction	
C.1.1.a.	Prior to the initiation of construction, a written historical reconstruction of each specific location shall be conducted, utilizing maps, photographs, census data, etc. Such additional research should be conducted on a building-site-by-building-site basis, as development is proposed over an extended period of time and some areas are not proposed for new construction. A record of historical reconstruction should include information obtained from sources including, but not limited to, the following data: maps, property ownership, street locations, street addresses, directories, and census information. Historical reconstruction for the entire area is currently underway by the Chinese Historical Society of Southern California and by staff members of El Pueblo de Los Angeles Historic Park. To the extent feasible, this work can be comparatively evaluated with the ADP area to contribute to the historical reevaluated construction for the project site. Once a written historical reconstruction has been completed for the specific construction location, the archival mitigation requirement should be considered as satisfied; and all following mitigation steps, as necessary, lie within the realm of fieldwork.
Project Construction	
C.1.1.b	Archaeological monitoring of all subsurface excavation shall be required within the potentially significant historic and prehistoric stratigraphic levels to ensure that no cultural resources are buried under existing development contained within the project property. Below these levels, once sterile soil is encountered and it can be determined that no stratigraphically lower levels masked by thin sterile deposits exist, archaeological monitoring should not be necessary. If such monitoring of the cultural levels (i.e., the fill brought in to cover the old pre-construction surface, the surface itself, and any historic and/or prehistoric cultural levels below it) indicates the absence of significant archaeological deposits, then mitigation of adverse impacts has been achieved in that location, and no additional archaeological work is necessary.
C.1.1.c	In the event that potentially significant cultural resources are encountered during the course of construction, all development must cease in the immediate area of the cultural resource until l the cultural resources are properly assessed and subsequent recommendations are determined by a qualified archaeologist. This measure is designed to prevent any cultural resources from being damaged and/or destroyed during project development. In addition, the designated depository, as well as the applicant's archaeologist, must be notified immediately if subsurface cultural materials are discovered. If monitoring reveals problematic archaeological deposits, then additional mitigation steps may be required. Such steps include test excavations to reveal whether such deposits are significant or insignificant. If they are determined to be of little or no significance, then no additional archaeological work is necessary. However, if such deposits are determined to be significant, then salvage excavation of a representative sample might be required. Such decisions can only be made on a case-by-case basis depending upon the specific stratigraphic situation discovered for each proposed construction location.
C.1.1.d	Demolition of existing structures or pavements and controlled removal of at least 10, and possibly up to 15, vertical feet of overburden may be necessary prior to actual initiation of any intensive archaeological mitigation work. This is recommended over costly and redundant archaeological test excavations via deep exploratory trenching at the outset, which could miss deeply buried deposits of limited horizontal extent. At minimum a physical inspection of any and all historic or prehistoric archaeological deposits must be made prior to a determination of significance. Badly disturbed deposits may require test excavation for determination of significance. Such inspection or testing can only be made if archaeological monitoring is conducted concomitantly with initial grading. Only if such deposits can be determined significant should they be mitigated through archaeological salvage excavations.
C.1.1.e	Artifacts determined to be prehistorically or historically significant should be preserved and provided to the designated depository for research purposes.
Paleontological Resources	
Phase I & Buildout Phase	
The measures listed will allow for the recovery of fossil remains, should any additional remains be encountered by excavation in the ADP area, and associated geologic and geographic site data, and for their preservation in a museum repository, where they would be available for future study by qualified investigators. As appropriate, these measures shall be conducted prior to and during excavation for subterranean structures below the artificial fill.	

No.	Mitigation Measure
Preconstruction	
C.2.1.a	Prior to any earth-moving activity in the ADP area, the applicant shall retain the services of a qualified vertebrate paleontologist approved to manage a paleontological resource impact mitigation program. The contracted person or firm shall have experience in conducting similar programs in areas underlain by rock units containing large and small land mammal remains.
C.2.1.b	The program manager shall prepare a treatment plan with a discovery clause to allow for the salvage and treatment of an unusually large or productive fossil occurrence that cannot be recovered and/or processed without diverting personnel from monitoring. The treatment plan shall specify the procedures and costs involved with rock sample recovery, processing, and sorting; or large specimen recovery, preparation, and stabilization; and identification, cataloguing, curation, and storage of such an occurrence. The discovery clause shall specify when and how the treatment plan would be initiated.
Construction	
C.2.1.c	A field supervisor, in consultation with a qualified paleontologist, shall monitor excavation on a part-time basis once excavation has encountered the alluvium below the artificial fill. If fossil remains are uncovered by excavation, monitoring shall be increased during excavation.
C.2.1.d	Monitoring shall consist of examining excavations and spoils for larger fossil remains, and test screening spoils for smaller fossil remains. If larger fossil remains are encountered by earth moving, the field supervisor shall have the authority to temporarily divert earth moving around the fossil site until the remains have been examined, their importance determined, the remains removed, if warranted, and earth moving allowed to proceed through the site. To ensure earth moving is not delayed, the field supervisor, if warranted, shall have the earth-moving contractor assist in moving the remains to an adjacent location for later transport to a museum or laboratory facility.
C.2.1.e	The field supervisor shall instruct construction personnel on their responsibilities and the procedures to be implemented if fossil remains are encountered when the monitor is not onsite.
C.2.1.f	If fossil remains are encountered, earth moving shall be diverted around the fossil site until the field supervisor or paleontologist has been called to the site and examined the remains, determined their importance, removed the remains, if warranted, and allowed earth moving to proceed through the site.
C.2.1.g	If smaller fossil remains are found by test screening, the monitor shall flag the fossiliferous spoils to ensure they are not disturbed by earth moving, evaluate the spoils by additional test screening, and, if determined sufficiently productive, recover a sample (not to exceed 6,000 pounds) of the spoils or undisturbed sediment at the fossil site for processing. To ensure earth moving is not delayed, the monitor, if warranted, shall have the earth-moving contractor assist in moving the sample to an adjacent location for later transport to a museum or laboratory facility.
C.2.1.h	Any fossil site discovered as the result of monitoring shall be plotted on a map of the ADP area.
C.2.1.i	Following the completion of monitoring, any fossil remains or fossiliferous rock sample shall be provided to a museum or laboratory facility for processing, sorting, preparation, stabilization, identification, and curation, and preparation of findings describing the scientific importance of any recovered fossil remains. The specimens and associated geologic and geographic site data shall be placed in a museum collection for permanent storage.
Historical Resources	
Phase I & Buildout Phase	
There is a potential significant adverse impact expected from rehabilitation work on existing historic structures which can be avoided if it conforms to the Standards. Furthermore, demolition of a portion of Union Station and proposed new development will constitute significant adverse effects, and therefore under Phase I of the ADP the following measures shall be implemented.	
C.3.1.a	Rehabilitation work during Phase I of the proposed project shall conform to the "Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings."

No.	Mitigation Measure
C.3.1.b	All historic buildings or portions of historic buildings to be removed shall be documented with black and white archival photographs showing all views plus significant exterior and interior architectural or construction details, keyed to a map of the site. This documentation shall include large format photography and measured drawings. The photographs and plans prepared as mitigation should be submitted to the Los Angeles Conservancy and the City Planning Department for inclusion in their architectural and cultural resources surveys.
C.3.1.c	The Historic Preservation Element shall include design guidelines to ensure the compatibility of new construction with the historic character of Terminal Annex and Union Station and provide appropriate open space.
C.3.2	Mitigation Measures C.3.1.a, C.3.1.b and C.3.1.C shall be implemented for the Buildout Phase of the proposed project.
C.3.3.	Mitigation Measures C.3.1.a, C.3.1.b and C.3.1.C shall be implemented for the Buildout Phase of the proposed project.
Geologic Hazards	
Phase I	
H.1.1.a	For each project or structure within Phase I development, the applicant shall conform to all applicable provisions of the Los Angeles Municipal Code, including the revised (1992 as amended) Division 23, Section 2312 of the Building Code which sets forth regulations concerning proper earthquake design and engineering and requires dynamic analysis for structures that are over 160 feet in height. The information regarding ground motion and spectra response determined from the dynamics analysis shall be implemented in the seismic design of the buildings.
H.1.1.b	Each project or structure within Phase 1 development shall conform to the criteria set forth in the 1990 Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.
H.1.1.c	Each project or structure within Phase I development LS shall conform with the intent and recommendations of the City of Los Angeles Seismic Safety Plan. As adopted by the city in the General Plan, the Plan sets forth general planning policies for the City of Los Angeles concerning existing development, new development (e.g., prohibiting construction of buildings for human occupancy across surface fault traces, preparation of required geologic reports for projects located in designated study areas), critical facilities, emergency preparedness, and post-disaster recovery.
H.1.2	A project-specific geotechnical investigation shall be performed for each building site to evaluate the liquefaction, seismic settlement, and differential settlement of the artificial fill and natural soils underlying the specific building location. The study shall be prepared to the satisfaction of the Department of Building and Safety for the particular building site prior to issuance of a building permit.
Buildout Phase	
H.1.3	Mitigation Measures H.1.1.a through H.1.1.c shall be implemented for the Buildout Phase of the proposed project.
H.1.4	Mitigation Measures H.1.2 shall be implemented for the Buildout Phase of the proposed project.
Grading	
Phase I	
H.2.1.a	Where there is sufficient space for sloped excavations, temporary cut slopes less than 30 feet in height shall be made at a 1.5:1 or 2:1 (horizontal to vertical) gradient for each project or structure within Phase I of the proposed project. However, the stability of the graded slopes shall be addressed when grading plans are completed for each project or structure. Vertical cuts deeper than four feet in height shall be avoided.
H.2.1.b	Where sufficient space for sloped excavations is not available, shoring shall be used for each project or structure within Phase I of the proposed project. The shoring system may consist of soldier piles and lagging. Recommendations for the proper design of the shoring system shall be provided by a licensed geotechnical engineer.

No.	Mitigation Measure
H.2.1.c	A soils and foundation study shall be performed for each building location to evaluate the stability of temporary or permanent grading excavations. The study shall be prepared to the satisfaction of the Dept. of Building and Safety as part of the project approval process and prior to issuance of a building permit for the particular location.
H.2.1.d	During construction, all grading shall be carefully observed, mapped, and tested by the project geotechnical engineer. All grading shall be performed under the supervision of a licensed geotechnical engineer and/or soils engineer, in accordance with applicable provisions of the Municipal Code, to the reasonable satisfaction of the City Engineer and the Department of Building of Safety.
H.2.1.e	The project shall be constructed in compliance with all applicable requirements of the California Construction and General Industry Safety Orders, the Occupational Safety and Health Act of 1970, and the Construction Safety Act.
H.2.2.a	The soils and foundation study for each building location shall delineate areas containing deep fill soils. Construction of structures in these areas shall include appropriate design and construction mitigation measures, in accordance with the requirements of the Department of Building and Safety.
H.2.2.b	If the depth of fill material within the building area is too excessive to make its removal and recompaction feasible, the proposed structures may be supported on pile foundations. The piles shall penetrate the existing fill soils to develop adequate load capacity.
H.2.2.c	Where the planned depth of excavation does not extend below the existing fill soils, the existing fill soils shall be removed and recompacted in accordance with the requirements of the Department of Building and Safety.
H.2.3.a	Excavations extending below the water table may require temporary dewatering during construction, as well as a permanent dewatering system. The permanent dewatering system, if required, may consist of the waterproofing of basement walls and a subdrain system beneath the subterranean floor slab.
H.2.3.b	In lieu of installing a permanent subdrain system, the portion of building walls and floor slabs extending below the groundwater table shall be waterproofed and designed to resist the hydrostatic pressures in addition to resisting the pressures imposed by the retained earth.
H.2.3.c	The hydrostatic design or subdrain system shall be subject to the review and approval by the Department of Building and Safety.
H.2.4	Large structures located directly above the Metro tunnel shall be supported on drilled piles extending below the tunnel. The building floor slabs shall also be structurally supported in compliance with City code requirements and in cooperation with LACMTA.
H.2.5.a	During excavation and construction, contaminated soil and groundwater may require on-site remediation and/or removal and disposal. Any necessary treatment or disposal of contaminated soil and groundwater will be conducted in accordance with applicable regulatory requirements. Appropriate permits will be obtained to conduct necessary treatment and disposal, including a National Pollutant Discharge Elimination System (NPDES) permit from the Los Angeles Regional Water Quality Control Board for the disposal of remediated groundwater in the local storm drain system. Disposal of contaminated soil will take place at facilities specifically authorized to accept such materials.
H.2.5.b	Mitigation Measures J.1.a through J.1.j in Section IV.J (Risk of Upset) shall be implemented for Phase 1.
Buildout Phase	
H.2.6	Mitigation Measures H.2.1.a through H.2.1.e shall also be implemented for the Buildout Phase of the proposed project.
H.2.7	Mitigation Measures H.2.2.a through H.2.2.C shall also be implemented for the Buildout Phase of the proposed project.
H.2.8	Mitigation Measures H.2.3.a through H.2.3.C shall also be implemented for the Buildout Phase of the proposed project.
H.2.9	Mitigation Measure H.2.4 shall also be implemented for the Buildout Phase of the proposed project.
H.2.10	Mitigation Measures H.2.5.a and H.2.5.b shall also be implemented for the Buildout Phase of the proposed project.

No.	Mitigation Measure
Risk Of Upset	
Phase I & Buildout Phase	
J.1.1.a	If contaminated groundwater or soil is encountered during construction, such contaminated groundwater or soil shall be handled in a manner satisfactory to all public agencies with jurisdiction over such matters.
J.1.1.b	The project site shall be properly secured to prevent access by the general public, thereby minimizing the possibility of exposure to contaminated groundwater.
J.1.1.c	A Remediation Action Plan (RAP) will be developed and implemented for the remediation of the contaminated soil and groundwater at the Terminal Annex.
J.2.a	If contaminated soil is encountered during project construction, such contaminated soil shall be handled in a manner satisfactory to all public agencies with jurisdiction over such matters.
J.2.b	The project site shall be properly secured to prevent access by the general public, thereby minimizing the exposure to contaminated soils.
J.2.c.	Refer to Mitigation Measure J.1.c.
Hydrology and Water Quality	
Surface Water Runoff/Hydrology	
Phase I	
I.1.a	To reduce erosion, protective measures (e.g., placement of sandbags around basins, construction of a berm to keep runoff from flowing into the construction site, or keeping motor vehicles at a safe distance from the edge of excavation) shall be implemented during construction.
I.1.b	Storm water discharges from the site shall meet, at a minimum, all applicable requirements of the State Regional Water Quality Control Board and NPDES permit requirements, and shall comply with implementation of these requirements through responsible City and County of Los Angeles agencies.
I.1.c	A Storm Water Pollution Prevention Program (SWPPP) shall be prepared and submitted for review and approval by the Bureau of Engineering, Storm Water Management Division, prior to issuance of a building permit. The SWPPP shall identify pollutants and applicable Best Management Practices (BMPs) to manage runoff quality.
I.2.a	A drainage plan shall be developed, subject to the approval of the City Engineer, as part of the Plan Check process and prior to development of any drainage improvements.
I.2.b	No mitigation is required. However, the proposed project shall demonstrate compliance with requirements set forth by the Department of Building and Safety and the City Engineer concerning storm water drainage and flood proofing prior to development of any drainage improvements.
Buildout Phase	
I.3	Mitigation Measures I.1.a and I.1.b shall also be implemented for Buildout Phase of the proposed project.
I.4	Mitigation Measures I.2.a and I.2.b shall also be implemented for Buildout Phase of the proposed project.
Noise	
Phase I	
All construction activities shall be conducted in a manner to minimize noise. Although construction impacts are not expected to be significant, the following measures shall be implemented, where feasible:	
G.1.a	Haul truck routes and staging areas shall avoid residential streets, and to the extent feasible, streets adjacent to local schools.
G.1.b	Compliance with all provisions of the City of Los Angeles Noise Ordinance (Ordinance No. 144.331, 1973 as amended), Chapter XI of the Los Angeles Municipal Code, Noise Regulations, Articles 1-4 shall be required..

No.	Mitigation Measure
G.1.c	Construction contracts shall require project contractors to use power construction equipment with noise shielding and muffling devices to the maximum extent feasible.
G.1.d	Noise barriers such as temporary wooden barrier walls, mufflers surrounding the construction site, and noise entrenching devices shall be employed to the fullest extent possible to reduce the intrusive construction noise.
G.1.e	Recreational space with residential uses shall be designed to meet City exterior standards. Adequate structural attenuation shall be incorporated into residences to meet Title 24 noise insulation standards.
Buildout Phase	
G.2	Mitigation Measures G.1.a through G.1.d shall be implemented during the Buildout Phase to reduce construction noise.
G.3	Recreational space with residential uses shall be designed to meet City exterior standards. Adequate structural attenuation shall be incorporated into residences to meet Title 24 noise insulation standards.
Public Services (Fire Protection, Police Protection, Schools	
Fire Protection	
Phase I	
L.1.1.a	All portions of every commercial or industrial building must be within 300 feet of an approved fire hydrant. 'Me maximum distance between fire hydrants on roads and fire lanes is 300 feet.
L.1.1.b	An approved fire lane shall be provided by the applicant if any portion of a first-story exterior wall of any building or structure is more than 150 feet from the edge of the roadway of an improved street.
L.1.1.c	Fire lane width shall not be less than 20 feet; and, where a fire lane must accommodate the operation of a Fire Department aerial ladder apparatus, or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
L.1.1.d	At least two different ingress/egress roads shall be required in each major development area to accommodate major fire apparati and provide for an evacuation during emergency situations.
L.1.1.e	Fire Department access will remain clear and unobstructed during periods of demolition.
L.1.1.f	The proposed project shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.
L.1.1.g	Fire lanes, where required, and dead end streets shall terminate in a cul-de-sac or other approved turning area.
L.1.1.h	When required access is provided by an improved street, fire lane, or combination of both which results in a dead-end excess of 700 feet in length from the nearest cross street, at least one additional ingress-egress roadway shall be provided in such a manner that an alternative means of ingress-egress is accomplished.
L.1.1.i	All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sip no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.
L.1.1.j	Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.
L.1.1.k	The design, location, operation, and maintenance of any security gates shall be to the satisfaction of the Fire Department.
Buildout Phase	
l.1.2.a	Phase I Mitigation Measures L.1.1.a through L.1.1.k shall also be implemented for the Buildout Phase of the proposed project.

No.	Mitigation Measure
L.1.2.b	During Buildout Phase of the development, the Terminal Annex property owner shall provide a replacement Task Force Station to be built to service the project area. The location of the replacement station shall be near the intersection of two major streets. A minimum lot of 200 feet by 200 feet is required to build a Task Force Fire Station. The site selection shall be agreed upon by the applicant and the Fire Department. The dedication and transfer of ownership to the Los Angeles Fire Department of the final site selection shall be in accordance with all agreements reached with the applicant and approved by the Chief Engineer and General Manager of the Los Angeles Fire Department. In addition, the time frames for design, planning, and construction of the replacement Task Force Fire Station shall also be subject to the approval of the Chief Engineer and General Manager.
Police Protection	
Phase I	
L.2.1	Whenever possible, the project design will include these specific plan design features:
L.2.1.a	All public parking facilities will be well- illuminated when open and a closed-circuit television system or private security patrol or other surveillance techniques will be used to monitor the areas.
L.2.1.b	All pedestrian walkways and courtyards will be well- illuminated and landscaping will be controlled to ensure clear visibility of movement and activity.
L.2.1.c	All building entrances, elevators, and lobby areas, as well as entrances to transit points, will be well-illuminated and designed with minimum dead space to eliminate areas of potential concealment.
L.2.1.d	Public restrooms should be located such that security or lobby personnel can have visual access to the doorways. Public restrooms should not be located in isolated areas.
L.2.1.e	Office-level restrooms should be installed with limited access doorways which require a key or electronic code for access by authorized employees.
L.2.1.f	To the extent feasible, building design should consider pre-wiring opportunities for advanced state-of-the-art security measures. Such considerations might include future installation of 'help' or “911" buttons in strategic locations the project (i.e., near bank teller machines, in entry areas where individuals may be momentarily stalled waiting for elevators or punching in entry codes)..
L.2.1.g	Parking structures should be designed with people and auto security in mind. To the extent feasible, parking areas should be built as a "closed" system with fencing or screening covering window areas, and doors leading to parking areas limited to access via a keycard or electronic code system as a means to prevent unauthorized individuals from gaining access to autos.
L.2.1.h	Upon completion of the project, the applicant shall provide the Central Area Commanding Officer with a diagram of the project. The diagram shall include access routes, unit and building numbers, and any information that might facilitate timely police response.
L.2.1.i	Prior to plan finalization, the applicant shall coordinate with and provide to the Police Department's Crime Prevention Unit, project plans for review regarding crime prevention features that may be appropriate to the design of the project.
L.2.1.j	Where other agencies located on the site provide additional security officers, security officers from the following agencies shall be located on the ADP sites: MTA Police Department; U.S. Postal Police; Sheriff’s Department; and AMTRAK security. The presence of these officers, in combination with the police sub-station and equipment, shall offset the need for additional police officers to be provided by the project.
Buildout Phase	
L.2.2.a	All doors leading into residential units and hotel rooms shall be made of solid-core construction and contain dead bolt locks and "peepviewers."
L.2.2.b	No breakable glass shall be present within 40 inches of any hotel room or residential entry door.
L.2.2.c	Primary security measures shall include appropriate access control, surveillance, and lighting.
L.2.2.d	Entryways shall be designed with minimal dead space to eliminate areas of concealment.

No.	Mitigation Measure
L.2.2.e	Ornamental shrubbery shall be designed to allow surveillance of, and not afford cover for, individuals tampering with doors and windows.
L.2.2.f	Phase I Mitigation Measures L.2.1.a through L.2.1.j shall also be implemented for the Buildout Phase of the proposed project.
Schools	
Phase I	
L.3.1	The applicant shall pay school fees for commercial uses, as may be required by State law, at the time of issuance of a building permit. The current school fee is $0.28 per square foot for non-residential space. If built today and applied to the net gross floor area, development of Phase I would be required to pay a fee of $862,568 to the LAUSD.
Buildout Phase	
L.3.2.a	The applicant shall pay school fees for residential uses, as may be required by State law, at the time of issuance of a building permit. The current school fee is $1.72 per square foot for residential space. If built today, the residential development component of the Buildout Phase would be required to pay a fee of $516,000 to the LAUSD.
L.3.2.b	The applicant shall pay school fees for commercial uses, as may be required by State law, at the time of issuance of a building permit. The current school fees are $0.28 per square foot for non-residential space. If built today the Buildout Phase would be required to pay a fee of $2,842,532 to the LAUSD.
Recreation and Parks	
Phase I	
L.4.1	The project design shall incorporate the following recommended specific plan guidelines of the ADP: Continue the style and intent of the historic courtyard spaces; Connect open spaces into one continuous system; Provide open spaces with diverse size, style, and character.
Buildout Phase	
L.4.2	The Buildout Phase shall incorporate Mitigation Measure L.4.1.
L.4.3	In accordance with the requirements of the City of Los Angeles (Ordinance No. 141,422, amending Chapter 1, Article 7 of the Los Angeles Municipal Code), the project shall either pay the in-lieu fee to the city or develop park or recreation land on the project site using equivalent funding or greater. The proportion of total land on the site to be set aside for park and recreation land is based on the residential density as set forth in Section 17.12, Part B of the Municipal Code.
Water	
Phase I	
M.1.1.a	Automatic sprinkler systems shall be set to irrigate landscaping during early morning hour or during the evening to reduce water losses from evaporation. Landscaping shall be watered less often during cooler months and the rainfall season.
M.1.1.b	Wherever possible, the use of reclaimed water shall be investigated as a source to irrigate large landscaped areas such as pedestrian plazas, landscaped walkways, and other open spaces.
M.1.1.c	Selection of drought- tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption in new landscaped areas such as pedestrian plazas, walkways, and other open spaces.
M.1.1.d	Recirculating hot water systems shall be used where feasible in long piping systems (where water must be run for considerable periods before hot water is received at the outlet).

No.	Mitigation Measure
M.1.1.e	Lower volume water faucets and water saving showerheads; shall be installed in new construction and when remodeling as well as low flush toilets in all restrooms.
M.1.1.f	Plumbing fixtures shall be selected which reduce potential water loss from leakage due to excessive wear of washers.
M.1.1.g	Phase I of the project shall comply with all applicable sections of the City of Los Angeles' Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance.
Buildout Phase	
M.1.2	Phase I Mitigation Measures M.1.1.a through M.1.1.g shall also be implemented for the Buildout Phase of the proposed project.
Sanitary Sewers	
Phase I	
M.3.1.a	The project shall implement all water-conserving mitigation measures as outlined for Phase I in Section IV.M.1, Water.
M.3.1.b	Phase I of the project shall comply with the City of Los Angeles' Sewer Allocation Ordinance (No.166,060).
M.3.1.c	The sewer system shall be designed to limit flows tributary to the 16-inch line under Alameda Street to one-half of that line's capacity. Alternative existing sewer lines shall be utilized to meet project capacity.
Buildout Phase	
M.3.2.a	The project shall implement all water-conserving mitigation measures as outlined for project Buildout Phase in Section IV.M.1, Water.
M.3.2.b	Prior to Buildout Phase development, a flow test of downstream sewer lines shall be conducted to determine if existing sewer lines serving the project site still have adequate capacity to serve the Buildout Phase of the project. If any improvements to the local sewage collection lines are required, the applicant and the City shall determine the applicant's reasonable pro rata share of the cost for sewer system improvements.
M.3.2.c	Buildout Phase of the project shall comply with the City of Los Angeles' Sewer Allocation Ordinance (No. 166,060).
M.3.2.d	The sewer system shall be designed to limit flows tributary to the 16-inch line under Alameda Street to one-half of that line's capacity. Alternative existing sewer lines shall be utilized to meet project capacity.
Solid Waste and Disposal	
Phase I	
M.2.1	Although short-term construction impacts to solid waste and disposal services are considered less than significant, the following mitigation measure shall be implemented to further reduce adverse impacts: The project sponsor shall demonstrate that all construction and demolition debris, to the maximum extent feasible, will be recycled in a practical, available, and accessible manner during the construction phase. Documentation of this recycling program will be provided to the City of Los Angeles, Department of Public Works.

No.	Mitigation Measure
M.2.2.a	In accordance with AB 939, the City's Source Reduction and Recycling Element (SRRE) and the City's Solid Waste Management Policy Plan (CiSWMPP), the project sponsor shall prepare and submit a Source Reduction and Recycling Plan (SRRP) to the Planning Department prior to the approval of individual building permits, both documenting and outlining the incorporation of an on-site recycling/conservation program through a series of mandatory measures including, but not limited to, the following items: • Instituting a tenant/employee participation recycling program, whereby tenants/employees are given individual containers and bins to separate newsprint, white, and/or colored paper for regular custodian collection and deposit into larger separation containers to be removed by appropriate recyclers or haulers providing such services. • Instituting a tenant/employee education program which would, through a series of brief educational sessions, outline various methods whereby employees can further contribute to methods of recycling/conservation in the office and home (e.g., contracting with firms for purchase of recycled paper, use of two-sided reports, replacement of Styrofoam cups with coffee mugs, etc.).
M.2.2.b	The project shall incorporate the use of recycled materials in building materials, furnishings, operations, and building maintenance, to the extent feasible and allowed by local codes. The SRRP shall describe the use of these materials in the project.
M.2.2.c	A statement shall be included in the SRRP that instructs occupants about source reduction, recycling, and procurement of recycled materials. This statement shall be incorporated into the future ownership agreement, property management agreements, and tenant agreements.
M.2.2.d	A statement shall be included in the SRRP that specifies which of the following entities will provide collection of trash and source separated materials - the City of Los Angeles; project sponsor or property management service; independent recycling contractor; or private solid waste collector who provides recycling services.
M.2.2.e	The project owner, within its property management agreements, shall conduct an annual waste audit review and measure the effectiveness of the tenant education program and recycling collection activities. To the greatest extent possible, the audit shall include: • Review of purchasing patterns to eliminate materials not compatible with the established waste diversion program. • Review of operating procedures which generate either large amounts of waste or non-recyclable materials. • Review of company uses and activities. • Evaluation and expansion of recyclable materials to be included in a recycling program. • Review of employee awareness of recycling program goals, procedures, and accomplishments. Evaluation and implementation of training for all project occupants. The results of the study shall be used to improve the Source Reduction and Recycling Plan (SRRP) to reduce solid waste generation. The SRRP shall describe the methods by which designated recyclable materials will be separated from the waste stream, collected, and stored, to facilitate transportation to recycler or hauler providing such services.
M.2.2.f	The design of recycling systems shall facilitate source separation and collection of additional materials that may be designated as recyclable by the City in the future.
M.2.2.g	To the extent feasible, one or more of the following yard waste management techniques shall be incorporated into the maintenance of the project: • Planting drought tolerant plants so as to minimize yard waste. • Mulching and grass-recycling. • Local composting through regular landscape maintenance where appropriate.
M.2.3.a	The property owner will provide information to project occupants and operators regarding alternatives to commonly used hazardous materials in the business and governmental environment, as well as information regarding the proper storage, handling and disposal of hazardous waste.
M.2.3.b	The project will comply with all applicable regulations and/or measures outlined in the City of Los Angeles Household Hazardous Waste Element (HHWE).

No.	Mitigation Measure
Buildout Phase	
M.2.4.a	Phase I Mitigation Measures M.2.1 through M.2.3.b shall also be implemented for Buildout Phase under the proposed project.
M.2.4.b	For residential units, the project shall provide all tenants and each household with a practical and accessible means of recycling materials, including the design and allocation of recycling collection and storage space in individual units, and a centralized collection and storage area for the entire project.
Energy Conservation	
Phase I	
M.4.1.	Mitigation Measures F.1.1.d, F.1.1.e, and F.1.1.g LS shall be implemented to reduce energy consumption during the construction period.
M.4.2.a	Phase I development shall comply with the State Energy Conservation Standards for New Residential and Non-Residential Buildings (Title 24, Par 6, Article 2, California Administrative Code) which establish mandatory maximum energy consumption levels for new buildings and include energy conserving design features that must be incorporated into new development.
M.4.2.b	During the design process, each site developer shall consult with the DWP, Energy Services Subsection, regarding any specific energy demand requirements and possible system improvements (which may be required as a result of project implementation), and for project-specific Energy Conservation Measures.
Buildout Phase	
M.4.4	Mitigation Measures F.1.1.d, F.1.1.e, and F.1.1.g LS shall be implemented to reduce energy consumption during the construction period.
M.4.5	Phase 1 Mitigation Measure M.4.2.a shall also be implemented for the Buildout Phase of the proposed project.
Land Use	
Phase I	
A.1	No mitigation is recommended, as the Specific Plan is expected to result in a beneficial effect through implementation of programmed improvements. On an ongoing basis, the City will review building plans for consistency with the Specific Plan.
A.2	Mitigation measures B.1 through M.4.5, as identified in the other sections of this EIR. No additional mitigation is recommended, as the ADP is expected to result in a beneficial effect through implementation of programmed improvements. On an ongoing basis, the City will review building plans for consistency with the ADP.
Buildout Phase	
A.3	No mitigation is recommended, as the ADP is expected to result in a beneficial effect through implementation of programmed improvements. On an ongoing basis, the City will review building plans for consistency with the ADP.
A.4	Mitigation measures B.1 through M.4.5, as identified in the other sections of this EIR. No additional mitigation is recommended, as the ADP is expected to result in a beneficial effect through implementation of programmed improvements. On an ongoing basis, the City will review building plans for consistency with the ADP.
Traffic	
Phase I	
D.1.1.a	Implement the planned conversion of College Street to one-way eastbound, and Alpine Street to one-way westbound, to form a one-way couplet between Hill Street and Alameda Street. The Chinatown Citizen's Advisory Committee currently views the couplet as a temporary installation during construction of the Pasadena Blue Line (now renamed the A Line), whereas LADOT considers the couplet will be needed as a permanent installation because of reduced street capacity resulting from construction of the Blue Line.

No.	Mitigation Measure
D.1.1.b	Increase the peak hour target mode-split for transit and rideshare an additional five percent over the mode-split assumptions for Phase I of the ADP, as shown in Table 36. This will decrease the number of vehicle trips generated, and reduce project impacts. This will be accomplished through the comprehensive Transportation Demand Management Program (which will aggressively promote transit and rideshare use, and through performance monitoring of mode-splits for the ADP development program.) Implementation of Mitigation Measure D.1.1.a together with D.1.1.b would reduce the project impact to a less than significant level in the a.m. peak hour, but not to a less than significant level in the p.m. peak hour.
D.1.2 - D.1.5	Mitigation Measure D.1.1.b shall be implemented to reduce impacts, but not to a less than significant level.
D.1.6	Mitigation Measure D.1.1.a shall be implemented to reduce impacts, but not to a less than significant level.
D.1.7	Mitigation Measure D.1.1.a shall be implemented to reduce impacts, but not to a less than significant level.
D.1.8	Restripe the northbound approach to add an exclusive right-turn lane. This may require a small amount of right-of-way acquisition along the east side of Alameda Street.
D.1.9.a	Widen the northbound approach to add an exclusive right-turn lane.
D.1.9.b	Restripe the westbound approach (the exit driveway at Union Station) to provide one exclusive left-turn lane, one shared through left lane, and one shared through/right lane. Implementation of this measure along with Mitigation Measures D.L9.a would reduce the impact to a less than significant level in the a.m. peak hour, but not to a less than significant level in the p.m. peak hour. The impact in the p.m. peak hour would be a significant unavoidable impact. This intersection would, however, operate at an acceptable level of service (LOS D) in the p.m. peak.
D.1.10	Widen the northbound approach to add an exclusive right-turn lane. This would reduce this impact to a less than significant level in the a.m. peak hour but not to a less than significant impact in the p.m. peak hour. The impact in the p.m. peak hour would be a significant unavoidable impact. This intersection would, however, operate at an acceptable level of service (LOS D) in the p.m. peak.
D.1.11	Restripe the northbound approach Alameda Street from two to three northbound through lanes between N. Main Street and Alpine Street, and for one left turn lane, two through lanes and one through/right turn lane on the northbound intersection approach.
D.1.12.a	Implement dual left-turn lanes on Cesar E. Chavez Avenue in each direction, and widen east side of Vignes Street to add a northbound right-turn lane. This improvement is already planned as part of the Gateway Center but is not scheduled to be implemented until needed, or by the year 2010.
D.1.12.b	Mitigation Measures D.1.1.b and D.1.12.a shall be implemented to reduce the project impact to a less than significant level in the p.m. peak hour, but not to a less than significant level in the a.m. peak hour. In the a.m. peak hour this impact is considered a significant unavoidable impact, although the intersection would continue to operate at LOS D.
D.1.13.a	Widen and restripe the southbound approach to provide one exclusive right-turn lane, one shared through/right lane and one exclusive through lane and one exclusive left-turn lane. This will more evenly distribute the capacity of the available lanes. A small amount of right-of-way will be required to implement this mitigation.
D.1.13.b	Mitigation Measure D.1.1.b shall be implemented to reduce project impact. Implementation of Mitigation Measures D.1.1.b and D.1.13.a would reduce this impact but not to a less than significant level. The project impact is considered a significant and unavoidable project impact, although the impact would be only slightly over the threshold of significance, and the intersection would continue to operate at LOS E.
D.1.14-D.1.19	Mitigation Measure D.1.1.b shall be implemented to reduce impacts, but not to a less than significant level.
Buildout Phase	
D.1.20	Mitigation Measure D.1.21 shall be implemented to reduce impacts to a less than significant level.

No.	Mitigation Measure
D.1.21	Alternative Mitigations: A. Applicant Proposed - Provide reversible flow traffic lanes along this section of North Broadway between Avenue 18 and the northbound 1-5 ramps. This would provide for four southbound and two northbound traffic lanes in the a.m, peak hour, and the reverse configuration of four northbound lanes and two southbound lanes in the p.m. peak hour. This could be achieved by configuring the street such that either left-turns continue to be allowed or that left-turns are prohibited during peak periods. Peak period on-street parking restrictions would be required during both peak periods (compared to the current parking restrictions of only one direction in each peak period). B. LADOT Preferred - Providing additional turn LS lanes at the intersections of Broadway and the 1-5 Freeway ramps, instead of reversible lanes along the street. The rationale for this concept is that the key capacity constraints are in these intersections rather than Broadway itself.
D.1.22	Mitigation Measure D.1.41 shall be implemented to reduce impacts to a less than significant level.
D.1.23	Widen North Spring to add a central left-turn lane. This provides a refuge for turning traffic and enhances the capacity of the through lanes (by an estimated 10%). This mitigation measure would be implemented as right-of-way becomes available in the corridor. Implementation of this mitigation measure would reduce this impact but not to a less than significant level. It would remain an unavoidable significant impact, although North Spring Street would operate at LOS E in the a.m. peak and LOS D in the p.m. peak.
D.1.24	Mitigation Measure D.1.21 shall be implemented to reduce impacts to a less than significant level.
D.1.25	Improve Alameda Street from a four-lane to a six-lane street between Temple and First Streets. This would require widening of the roadway on either side. The widening on the east side may in the future be implemented in association with other development projects, such as the Mangrove Project and the First Street South Project. There are no current plans to widen on the west side of Alameda Street. This mitigation would provide for the project to contribute its fair-share portion to this improvement of Alameda Street at such time as the right-of-way became available for roadway widening.
D.1.26	Mitigation Measure D.1.41 shall be implemented to reduce impacts to a less than significant level.
D.1.27	No feasible physical mitigation was identified for this impact. This impact would be a significant and unavoidable impact.
D.1.28	Center Street is identified as a major arterial in the City's General Plan, although it is only built to collector street standards. However, widening of the street is not currently feasible due to adjacent land uses. The project will contribute its fair share portion to roadway widening to major highway standards at the appropriate time as right-of-way becomes available.
D.1.29	Mitigation Measure D.1.39 shall be implemented to reduce impacts to a less than significant level.
D.1.30	Provide for a curbed two-lane roadway with sidewalks, and stripe the roadway for multiple lanes on the approaches to the intersections at either end of this segment.
D.1.31.a	Restripe the northbound approach to add an exclusive northbound right-turn lane. This may be accomplished by restriping the roadway, but may require a small amount of right-of-way acquisition along the east side of Alameda Street.
D.1.31.b	Widen the westbound approach to add a westbound right-turn lane. This may require a small amount of right-of-way acquisition along the north side of Commercial Street. Implementation of this measure along with Mitigation Measure 3.1.31.a would reduce this impact to a less than significant level.
D.1.32	Mitigation Measure D.1.41 shall be implemented to reduce impacts to a less than significant level.
D.1.33	Widen the northbound approach on Alameda Street on the east side to add an exclusive right-turn lane. Implementation of this measure along with Mitigation Measure D.1.41 would reduce the a.m. peak hour impact at this location but would not reduce it to a less than significant level. This would remain a significant unavoidable impact, although the intersection would continue to operate at LOS D. Implementation of both mitigation measures would reduce the p.m. hour to a less than significant level.
D.1.34	Mitigation Measure D.1.41 shall be implemented to reduce impacts, but not to a less than significant level. This impact would be a significant and unavoidable impact although the intersection would continue to operate at LOS D.

No.	Mitigation Measure
D.1.35	Widen the northbound approach of North Main Street on the east side to add an exclusive northbound left turn lane.
D.1.36	Restripe the northbound approach of Alameda Street from two to three northbound through lanes between North Main Street and Alpine Street, and the intersection approach for one left, two through and one through/right-lane. Implementation of this mitigation measure would not reduce this impact to a less than significant level in the a.m. peak hour, although the LOS would remain at C. Implementation of this mitigation measure would reduce the p.m. hour impact at this location to a less than significant level.
D.1.37	Mitigation Measure D.1.41 shall be implemented to reduce project impacts. Implementation of Mitigation Measure D.1.41 would not reduce this impact in the a.m. peak hour, but would reduce the p.m. peak hour impact to a less than significant level. The impact in the a.m. peak hour would be a significant unavoidable impact. This intersection would, however, operate at an acceptable LOS E.
D.1.38	Significant roadway and intersection improvements are currently being implemented at this location as part of the Gateway Center Project, including the realignment of Vignes Street and the Vignes Street freeway ramps, as well as signalization and improvements to the intersection. No additional feasible physical mitigations have been identified for this intersection, as the intersection would operate at LOS D in the a.m. peak hour and LOS E in the p.m. peak hour. While Mitigated Measure D.1.41. may reduce this impact, it will not reduce it to a less than significant level.
D.1.39	Widen and restripe the southbound approach to provide one exclusive right-turn lane, one shared through/right-lane and one exclusive through lane and one exclusive left-turn lane. This will more evenly distribute the capacity of the available lanes. A small amount of right-of-way will be required to implement this mitigation. Implementation of this mitigation measure along with Mitigation Measure D.1.41 would reduce this impact to a less than significant level in the a.m. peak period, and would reduce the impact, but not to a less than significant level in the p.m. peak period. The p.m. peak hour impact is considered a significant and unavoidable project impact, although the intersection would continue to operate at LOS D during the p.m. peak hour.
D.1.40	Mitigation Measures D.1.41 shall be implemented to reduce impact to a less than significant level. On roadways adjacent to the project site, the property owner will be required by the City of Los Angeles to make any necessary right-of-way dedications and curb relocations such that the streets meet city standards for dimensions of major and secondary highways. The following streets are affected. Alameda Street between the El Monte Busway and North Main Street; Cesar E. Chavez Avenue between Alameda Street and the railroad bridge; North Main Street between Alameda Street and Vignes Street; and Vignes Street between North Main Street and the railroad bridge. Alameda Street, Vignes Street and Cesar E. Chavez Avenue are all major highways, for which the requirement is an 80- foot curb-to-curb width in a 100-foot right-of-way. North Main Street is a secondary highway, for which the requirement is a 66-foot curb-to-curb width in an 86-foot right-of-way (and 70-foot curb-to-curb flare section in 90-foot right-of-way on approaches to a major highway). Appropriate dedications and improvements should be made by the project sponsor to the half-width of each street as adjacent parcels are developed. Such actions should be coordinated with the mitigation measures previously identified.
D.1.41	No feasible mitigation measure has been identified for the northbound direction of this impact. Therefore, the impact on the northbound direction would be considered a significant, unavoidable impact. Improve Commercial Street east of Alameda Street and extend east of Center Street on a new bridge structure over the Los Angeles River to connect to Mission Road at the 1-5/1-10 on-ramps. Commercial Street between Alameda Street and Vignes Street would continue to operate as a two-way street. East of Vignes Street, Commercial Street would be a one way, eastbound roadway with two or three traffic lanes. This mitigation measure would also incorporate the relocation of the eastbound US-101 off-ramp from Hewitt Street to Vignes Street and the removal of the eastbound on-ramp at Hewitt Street. Both these ramp modifications are proposed as part of a realignment project for US-101 at this location by Caltrans. This proposed mitigation measure would also involve the removal of the eastbound on-ramp at Vignes Street, as this move would be provided for by the new Commercial Street Extension and use of the on-ramps from Mission Road which could be served by the Commercial Street Extension. This project, which is identified in the Downtown Los Angeles Strategic Plan, would significantly improve regional traffic in this freeway corridor, as well as mitigating project impacts. By removing a number of on and off-ramps in a short distance of freeway, merge/weave conflicts would be significantly reduced. By providing an extension of the Aliso Street frontage road from downtown all the way to the direct access ramps from Mission Road to the I-I0 eastbound and US-101 southbound onramps, this improvement would allow traffic heading east and south to enter

No.	Mitigation Measure
	the freeway system outside of the I-l0/US-101 interchange, significantly easing congestion on the US-101 in front of Union Station. This roadway would also provide relief to Cesar E. Chavez Avenue eastbound in the vicinity of Union Station and Terminal Annex in the p.m. peak, as it would provide an alternative route for traffic from downtown to the Mission Road/Cesar E. Chavez Avenue intersection. As this would be a major improvement project to the regional transportation infrastructure, with benefits accruing well beyond ADP project traffic, it is not expected that the ADP would construct this project. Rather, the ADP could provide a fair-share contribution to the cost. Also incorporated as a part of this mitigation measure would be the provision of a two-way two lane tunnel beneath US-101 from Commercial Street northward to connect to the P-1 Garage Level at Union Station, with access to the public parking, as well as the taxi and shuttle bus concourse proposed in the ADP. This facility would provide a direct route to primarily serve eastbound access to Union Station (from the downtown and the west), and eastbound egress from Union Station (for example, to the eastbound 1-10 and southbound US-101). This could avoid otherwise circuitous routes through the front and rear of Union Station. In addition to mitigating ADP impacts at a number of locations, this improvement would also reduce the volume of general traffic accessing the transit facilities through the front of Union Station, by providing a more direct access route, which would be particularly advantageous for taxis and shuttle buses. This improvement could be implemented in conjunction with the freeway realignment in front of Union Station currently proposed by Caltrans. Again, because this improvement would provide significant regional transportation benefit, beyond mitigation of ADP impacts, it is not expected that it would be implemented by the ADP, but rather the ADP would contribute to the cost of the project on a fair-share basis. Implementation of this mitigation measure would reduce the mainline freeway impact to a less than significant level in the southbound direction.
D.1.42	Mitigation Measures D.1.21 and D.1.23 shall be implemented to reduce impacts to a less than significant level.
D.1.43	No feasible physical mitigation measures have been identified for this impact. This is considered a significant and unavoidable impact.
D.1.44	Mitigation Measure D.1.41 shall be implemented to reduce impacts to a less than significant level.
D.1.45	No feasible physical mitigation have been identified for this impact. This impact is considered a significant and unavoidable impact. At these locations the only way to add capacity to the freeway would be to add lanes. No currently planned projects of this type, nor any feasible way of widening the freeway at these locations, have been identified. Moreover, mitigation measures to increase roadway capacity would be counterproductive to the greater use of transit for both the ADP and the downtown area in general. However, the City of Los Angeles intends to apply CMP credits from its citywide pool towards the ADP. The City has also anticipated that the ADP itself will generate substantial CMP credits through both the land use program and the transportation mitigation program.
D.1.46-D.1.51	Refer to Mitigation Measure D.1.45.

1.10 SUMMARY OF EFFECTS

Section 3.0, Environmental Impact Analysis, of this Addendum includes a detailed evaluation of any potential change in effects associated with implementation of the Project for each CEQA environmental issue area, organized consistent with Appendix G of the *State CEQA Guidelines.* The TCE Main Los Angeles project's impacts identified in this Addendum would either be comparable or reduced as compared to those identified in the ADSP FEIR.[3] In addition, the proposed Project creates no new impacts, nor does it increase the severity of any previously studied impacts considered in the ADSP FEIR. Therefore, as discussed in this Addendum, the

3 The ADSP FEIR found significant and unavoidable impacts would occur to the following resources: Aesthetics, Historical Resources, Traffic, Air Quality, Natural Light (Shade/Shadow), Fire Protection, Police Protection, Solid Waste and Disposal, and Energy Conservation.

proposed Project would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the *CEQA Guidelines,* and therefore an Addendum to the ADSP FEIR is the appropriate CEQA document to address these changes.

2.0 PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND

The ADSP FEIR evaluated the development of mixed-use and office uses on the project site. As described under **Section 1.0, Introduction**, the Project Applicant proposes to develop the site with a mixed-use affordable housing complex with community support services and a two-level subterranean parking structure.

This addendum focuses on the net change between the development scenario evaluated in the ADSP FEIR and the Project and describes changes to the approved Specific Plan under each environmental topic category before evaluating impacts specific to the Project.

2.2 SURROUNDING LAND USES AND SETTING

Surrounding development mainly consists of one- to four-story buildings with surface parking lots. The California Endowment (TCE - a health-focused non-profit) which includes administrative offices and the Center for Healthy Communities conference center, which serves nonprofit organizations, is south of the Project Site, and the four story CoreSite Data Center is located to the southeast, across an existing surface parking lot. The Hilda Solis Care First Village complex, which provides housing units and support services for the unhoused is north of the Project Site, across Vignes Street. Small scale commercial is to the west of the Project Site, between Main Street and Alameda Street. The United States Postal Service (USPS) has a carrier annex with surface parking southeast of the Project Site. Train tracks operated by Metro light rail, connecting to Union Station run along elevated tracks north of the Project Site along Vignes Street. Union Station, a major transit hub for Los Angeles and the region, lies approximately a quarter of a mile south of the Project Site.

Alameda District Specific Plan

The Alameda District Specific Plan was adopted by the City of Los Angeles in June of 1996 and establishes land use, development, and urban design regulations for the area, shown in **Figure 3**.

The Project Site is designated as “Mixed Use/Office Subarea” in the Specific Plan. The Specific Plan and certified ADSP FEIR evaluated the carrying capacity of 1,307,000 sq ft of commercial office development on the Terminal Annex site. The Specific Plan originally envisioned a mix of commercial and government offices, a conference center, and retail uses in the proximity of the Project Site.

Project Site Conditions

The Project Site’s development area is approximately 86,036 sq ft (1.98 acres) and the Project Site also includes an area extending to the south across TCE’s existing parking lot to accommodate a proposed pedestrian connection between the Project and the existing TCE buildings to the south (see **Figure 2**). The Project Site is bound by Main Street to the west; Vignes Street to the north; Rosabell Street and the surface parking lot of the USPS Carrier Annex to the east, and the surface parking lot supporting TCE administrative offices and conference center to the south. Primary access to the Project Site currently is from Rosabell Street, with an additional

access point off of Bauchet Street (a private street) from North Alameda Street. A portion of the Project Site is developed with a surface parking lot, with the remainder being vacant.

As described in the Tree Report (included as **Appendix B** to this Addendum) prepared for the proposed project, a total of 95 trees were identified within and immediately adjacent to the Project site, consisting of 43 native trees that meet the definition of a protected tree species under the Los Angeles Native Tree and Shrub Protection Ordinance and 52 non-protected trees. Project development is expected to result in the removal of six Peruvian pepper trees (a non-protected tree species). An additional 24 trees will experience minor disturbance (removal of concrete curbs) within their Tree Protection Zone (TPZ). These trees consist of eight western sycamores (a protected tree species), along with ten Peruvian pepper trees and six coast redwoods (both non-protected species). Implementation of Best Management Practices (as detailed in **Section 3.4, Biology**) are anticipated to adequately protect and preserve trees to be retained during construction.

2.3 DESCRIPTION OF THE PROJECT

The Project would include the construction of an approximately 193,493 sq ft mixed-use affordable housing complex. The Project includes two phases, the East Phase, which would include 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units), residential amenity and support offices, community care/commercial space, and 40 at-grade and above-grade parking spaces for residents within the podium levels of the building. The West Phase would include additional community care facilities, and a two-level subterranean parking structure to accommodate up to 175 commercial parking spaces. The Project would also include a new pedestrian connection between the TCE Main, Los Angeles development through the existing TCE parking lot, creating an accessible pathway to the TCE main campus buildings to the south.

Zoning Information

The General Plan land use designation of the Project Site is Regional Center Commercial, and the Project Site is zoned Alameda District Specific Plan Zone (ADP-RIO). The Project Site and adjacent parcels to the east and south are within the Alameda District Specific Plan area, which generally covers the area between N. Alameda Street to the west, Vignes Street to the north and east, and the Santa Ana Freeway (US-101) to the south, adjacent parcels to the west and north are not located in the Specific Plan Area and are zoned M3 and C2.

Project Components

East Phase

The residential component would be the tallest structure on the Project Site, rising seven stories to a maximum 90'-1" in height, located at the northeast corner of the Project Site. This building would be composed of two types of construction, a two-story podium level of Type Ia construction, also known as Fire Resistive, most commonly found in high-rise buildings, and designed to hold at bay fire for an extended amount of time; Type Ia structures are constructed of concrete and protected steel (steel coated with a fire-resistant material, most often a concrete mixture). The remaining five stories of the building, also known as Protected Combustible, or "ordinary" construction with brick or block walls and a wooden roof or floor assembly which is one-hour fire protected.

The residential component would contain a total of 124 dwelling units (100% restricted affordable for Lower Income Households excluding two managers' units), totaling approximately 129,192 sq ft. The 122 affordable housing units would include 58 one-bedroom units, 31 two-bedroom units and 33 three-bedroom units. The one- and two-bedroom apartments include one bathroom, while the three-bedroom units include two bathrooms. The main pedestrian entrances would be located from the central core of the Project Site with a central lobby that leads to stairs and an elevator to the six floors above the first floor. At the ground floor, there is an at-grade parking area, with space for 18 cars and the lobby, which includes elevator access to the above-grade garage with space for 22 cars and the floors above. A portion of units would have private, recessed balconies; these balconies are only at the interior of the building above the residential courtyard.

Additionally, the building would also include 25,473 sq ft of non-residential space in a two-level community care space and offices for residential support staff on the first and second floors of the building.

West Phase

The second phase of the Project would include the construction of a connected community care building with a maximum height of four stories (approximately 63 feet), a total of 38,828 sq ft, a two-level subterranean parking garage with up to 175 commercial parking spaces, and landscaped plazas for community gatherings. The new building would be Type IIa construction, Non-Combustible, generally built of non-combustible walls, partitions, columns, floors, and roof.

Additionally, this phase would include the creation of a pedestrian connection to the TCE main campus. The area of work would be approximately 15,895 sq ft (0.36 acres),[4] and would remove up to 35 surface parking spaces in the TCE parking lot to allow for an accessible path of travel and the installation of power infrastructure.

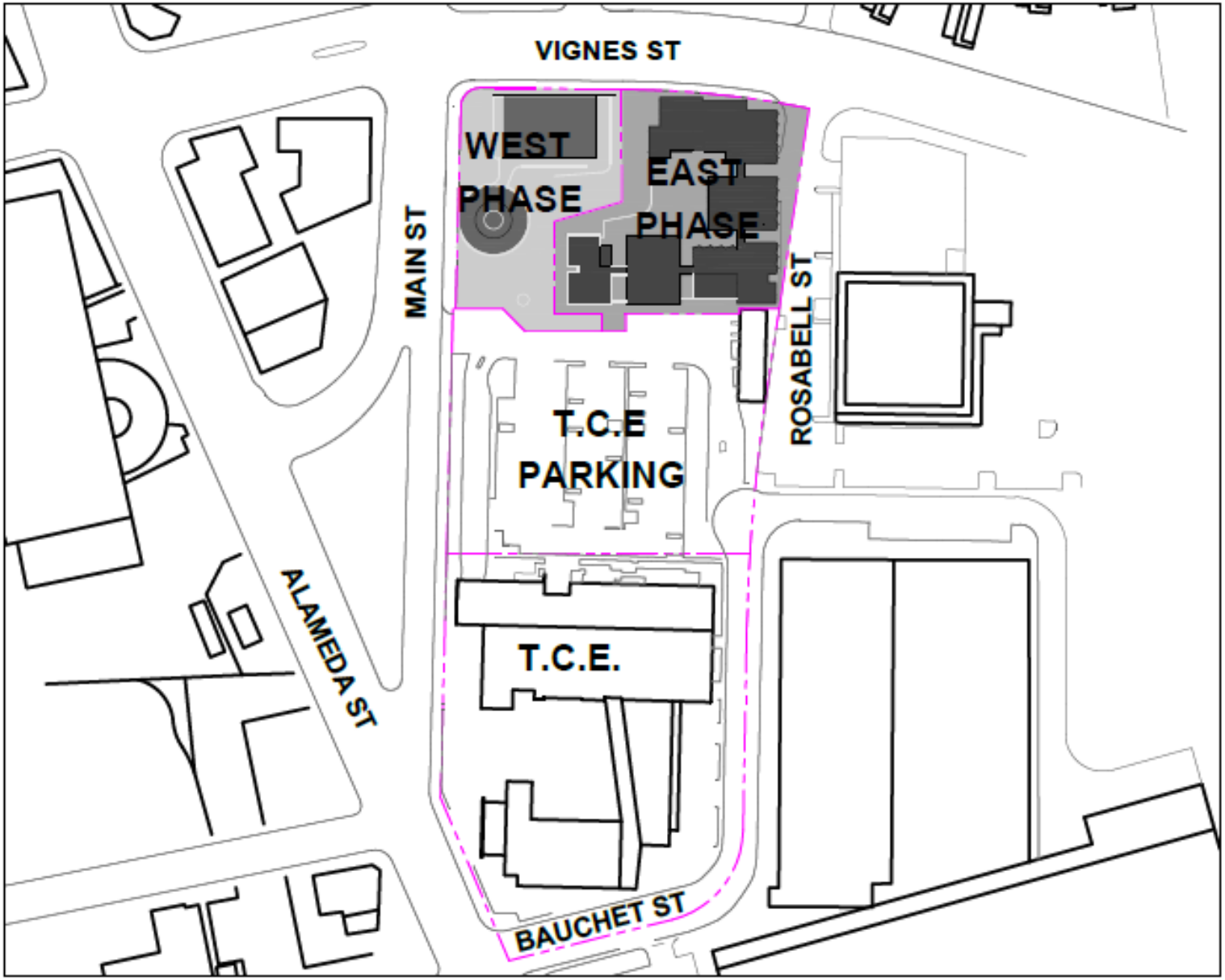
Building Design

The Project is designed in a modernist architectural style. This overall design concept was envisioned to create a strong sense of internal community, while remaining open and inviting to the surrounding neighborhood. The building's mixture of height, material, and color would create a visual break that reflects the mixed-use character and would help integrate the Project with the surrounding uses and context. The Project would activate the Main Street and Vignes Street frontages, while buffering the internal open space available to residents and commercial patrons and conceal the project's parking from people on the street.

The Project would include landscaped ground floor and podium level courtyards, with lounge areas on the roof decks for the exclusive use of the residents. While a small portion of the residential gathering area opens towards the TCE parking lot and commercial uses to the south, the remainder of the common areas are generally located at the interior of the Project Site to buffer the users from street noise, and to limit any potential adverse impact enjoyment of these amenities may have on neighboring properties. These open, landscaped spaces would generally be accessible to residential tenants, building employees and visitors.

The Project's plans, building sections, and elevations are provided in **Figures 7** through **24** as well as **Table 2.1-1, Project Development Program and Zoning Summary.**

4 This square footage is not included in the total lot area cited above.



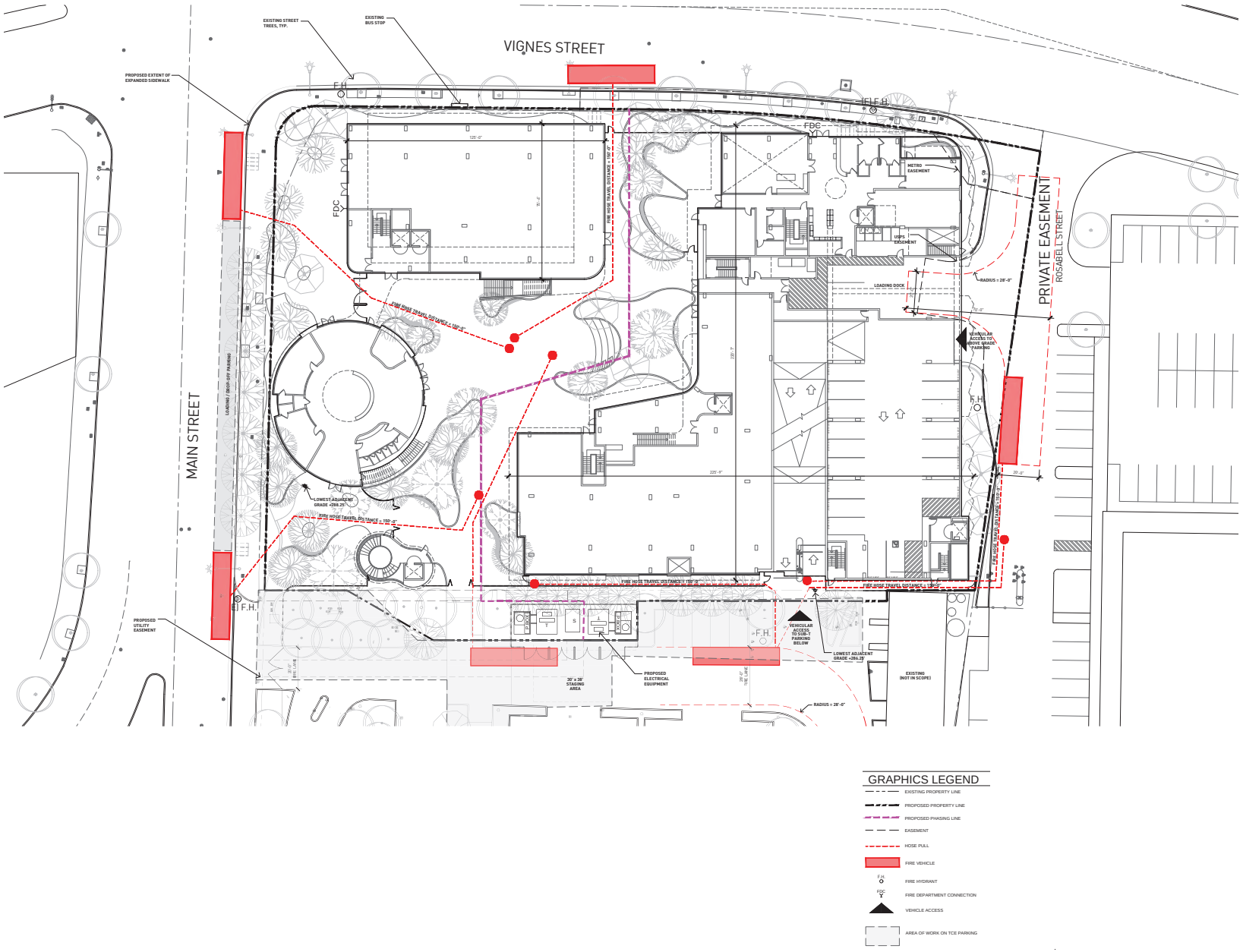
SOURCE:studioneleven, 2024

FIGURE 7

Area Plot Plan

IMPACT SCIENCES

1577.001•03/24



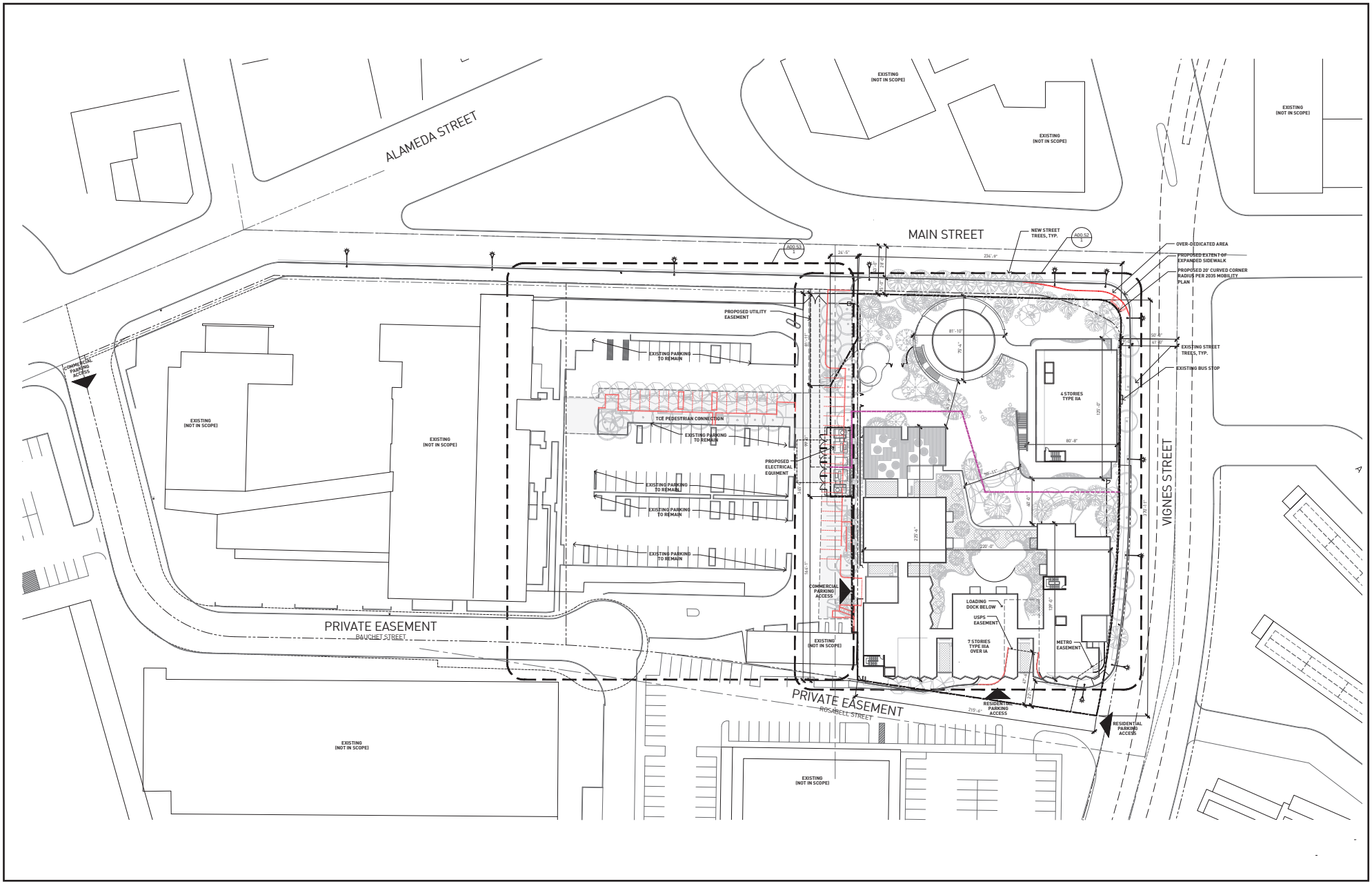
SOURCE: Studioneleven, 2024

FIGURE **8**

Enlarged Site Plan

IMPACT SCIENCES

1577.001•05/24



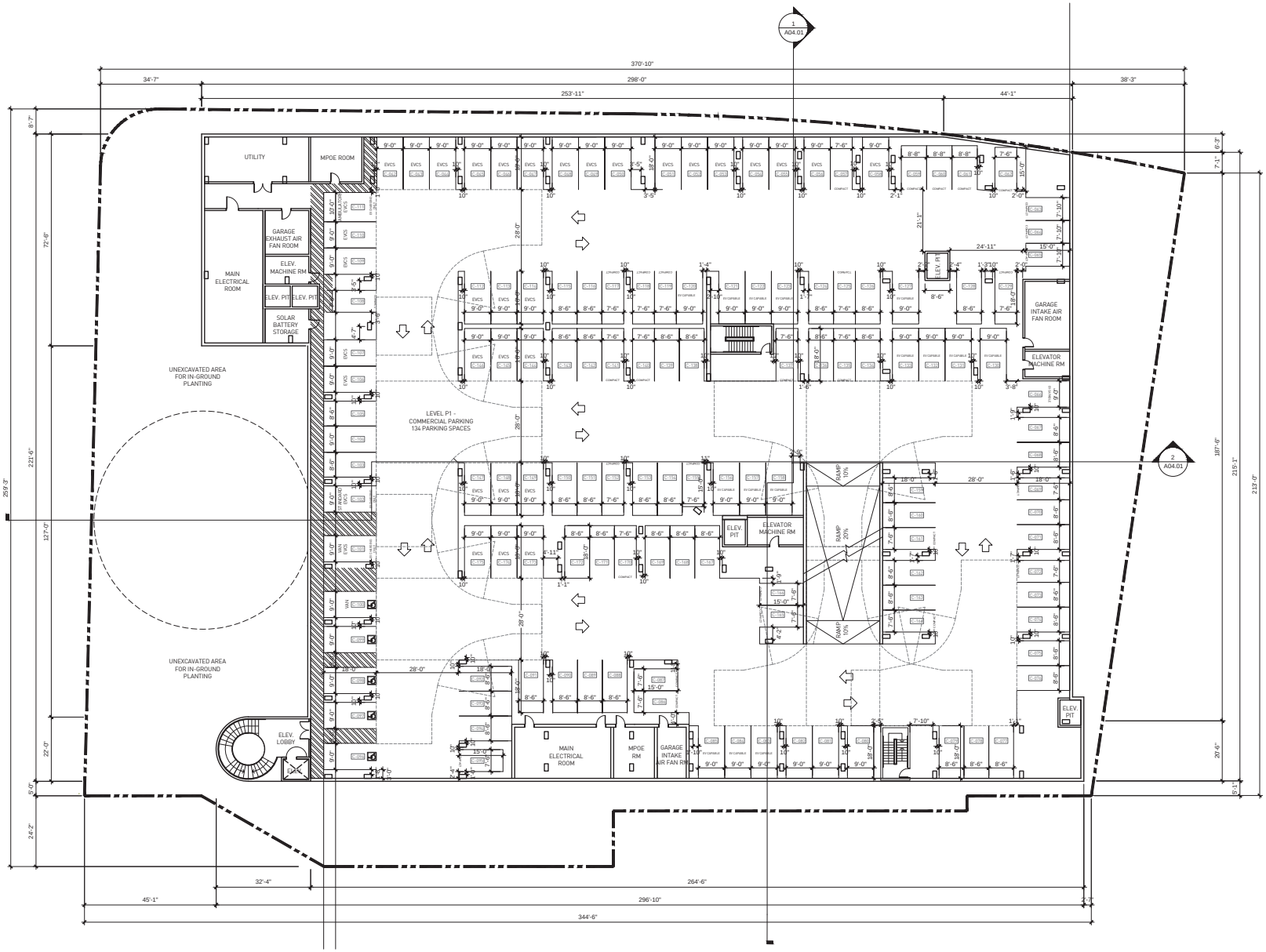
SOURCE: Sudioneleven, 2024

FIGURE **9**

IMPACT SCIENCES

Overall Site Plan

1577.001•05/24



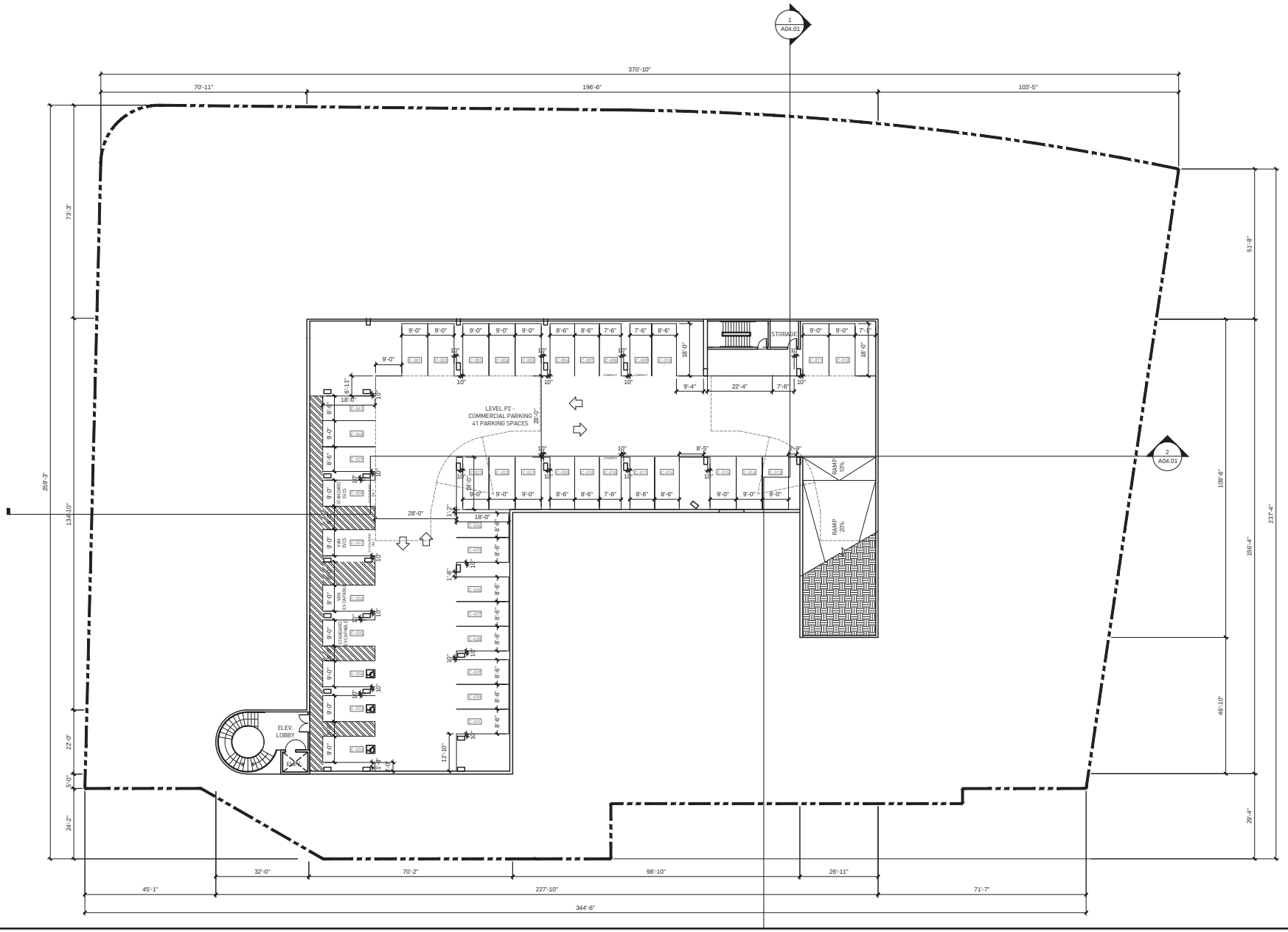
SOURCE: Studioneleven, 2024

FIGURE **10**

IMPACT SCIENCES

Floor Plan - Level P1

1577.001•05/24

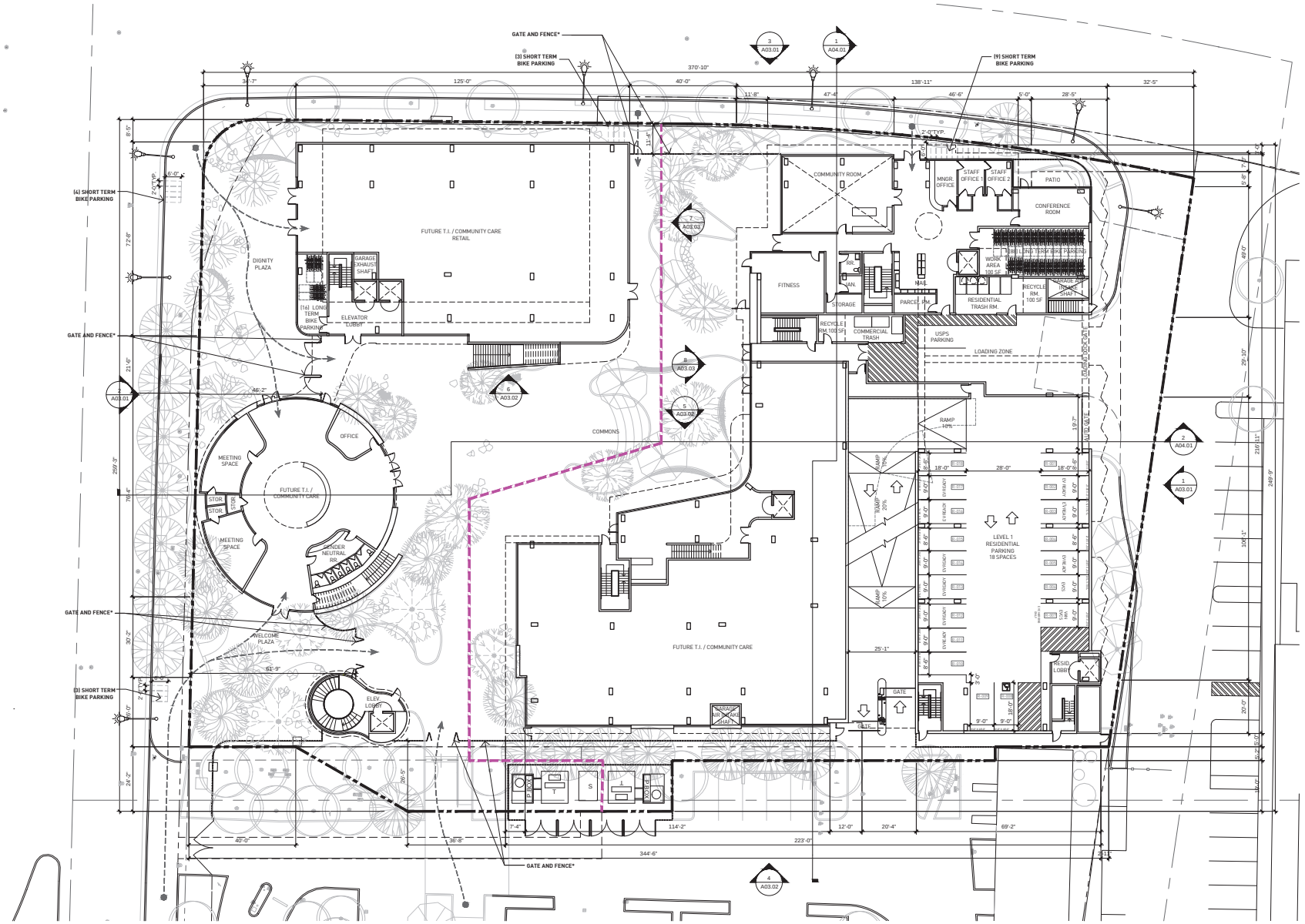


SOURCE: Studioneleven, 2024

FIGURE **11**

IMPACT SCIENCES

Floor Plan - Level P2



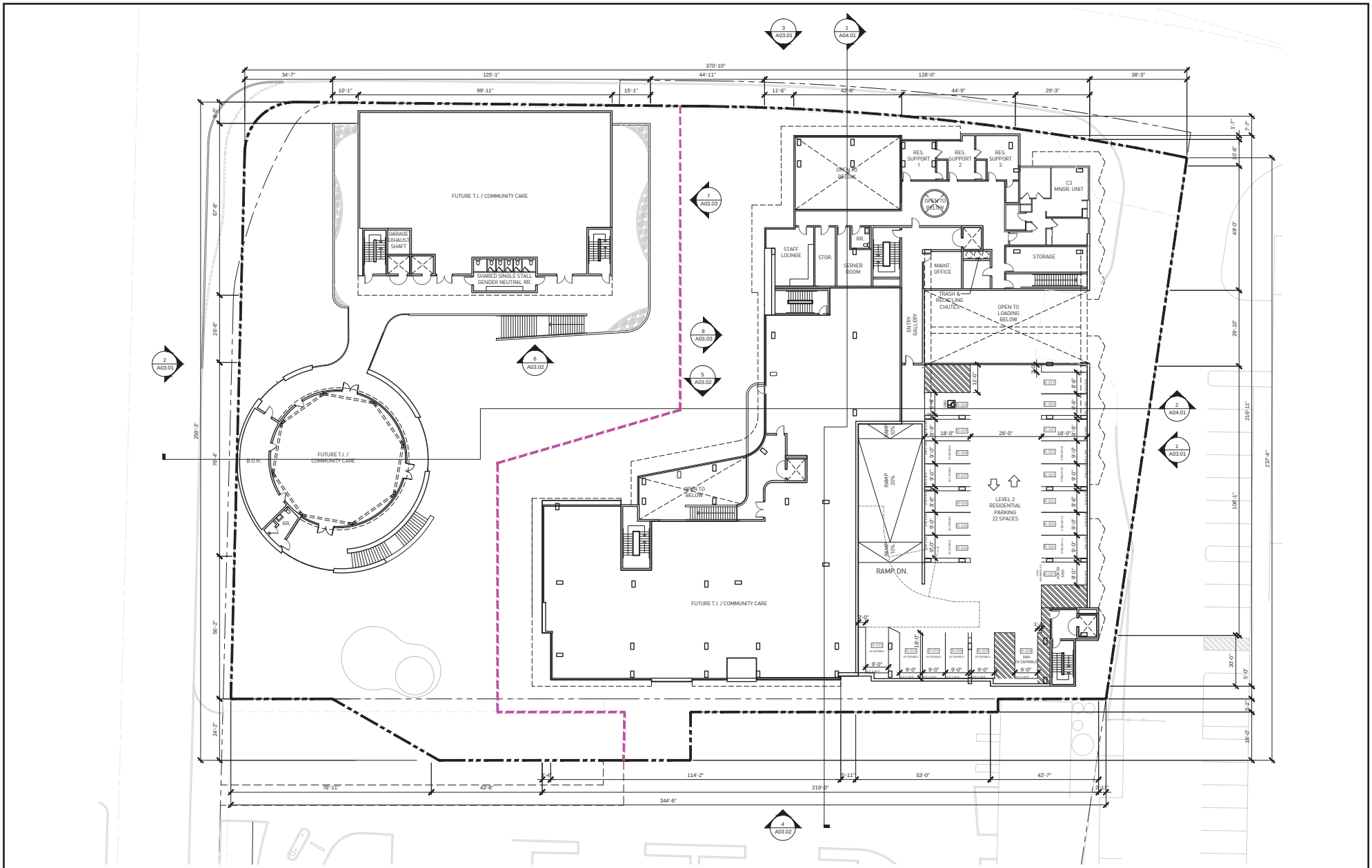
SOURCE: Studioneleven, 2024

FIGURE **12**

IMPACT SCIENCES

Floor Plans - Level 1

1577.001•05/24



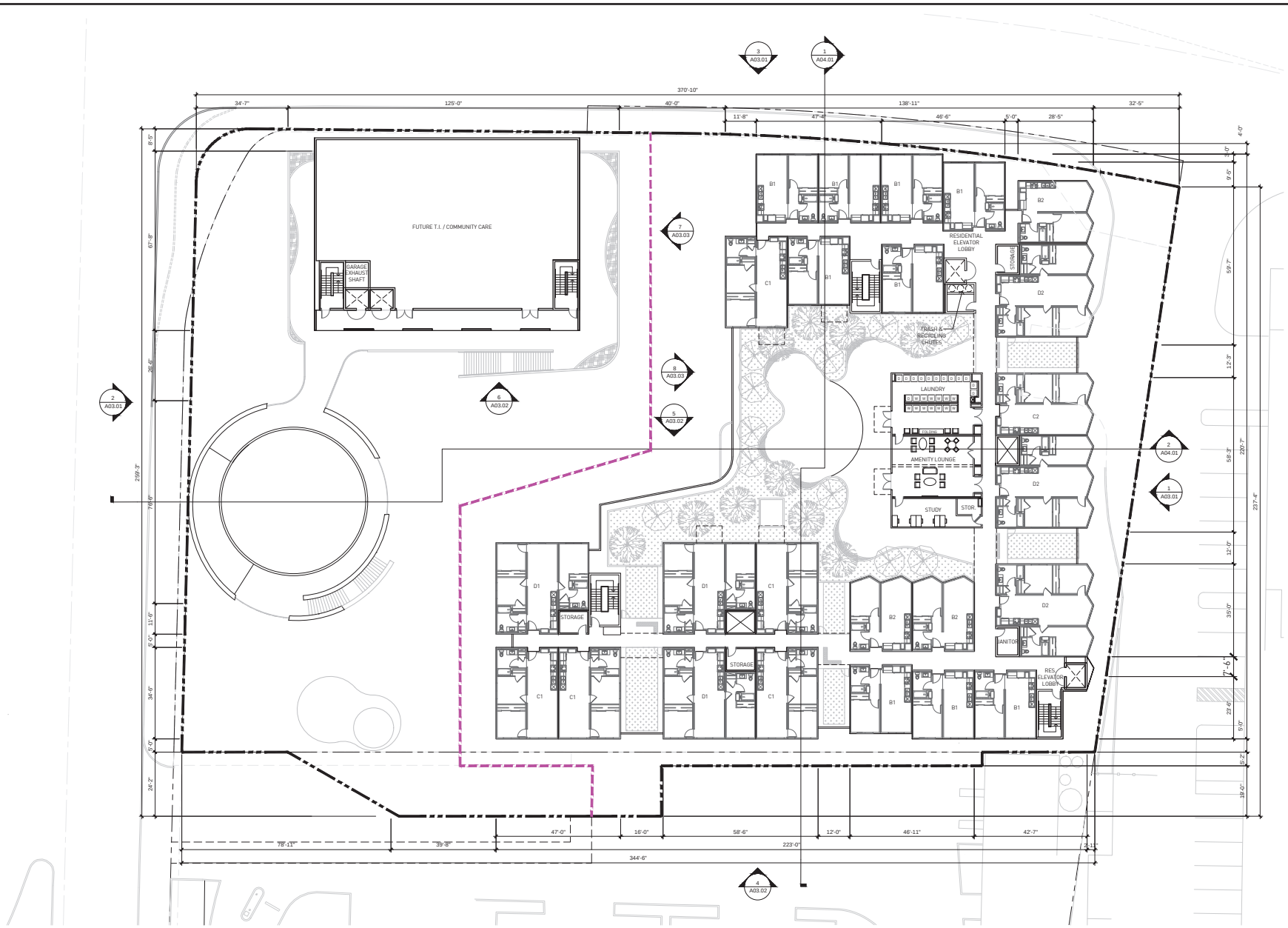
SOURCE: Studioneleven, 2024

FIGURE **13**

IMPACT SCIENCES

Floor Plans - Level 2

1577.001•05/24



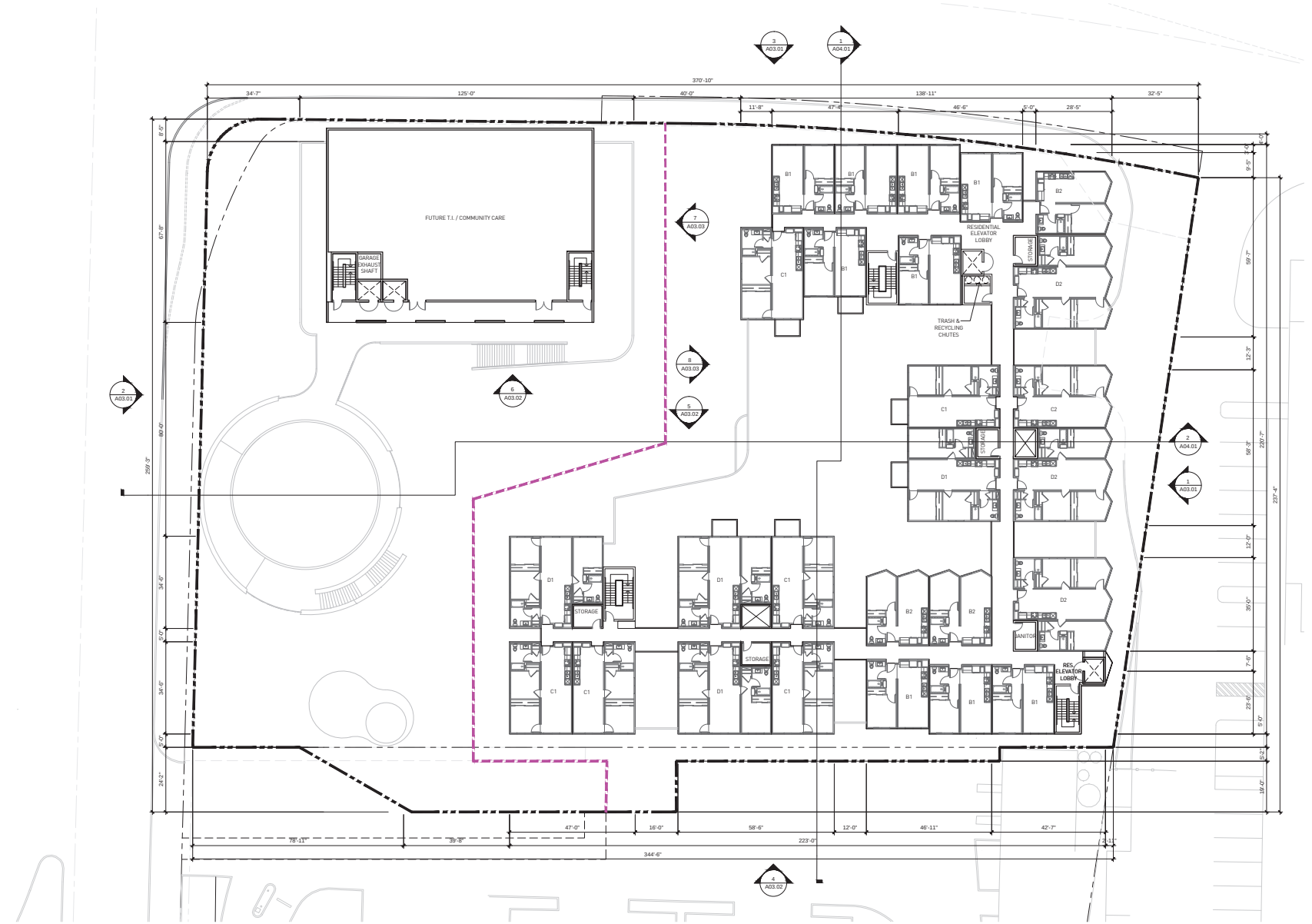
SOURCE: Studioneleven, 2024

FIGURE **14**

IMPACT SCIENCES

Floor Plans - Level 3

1577.001•05/24



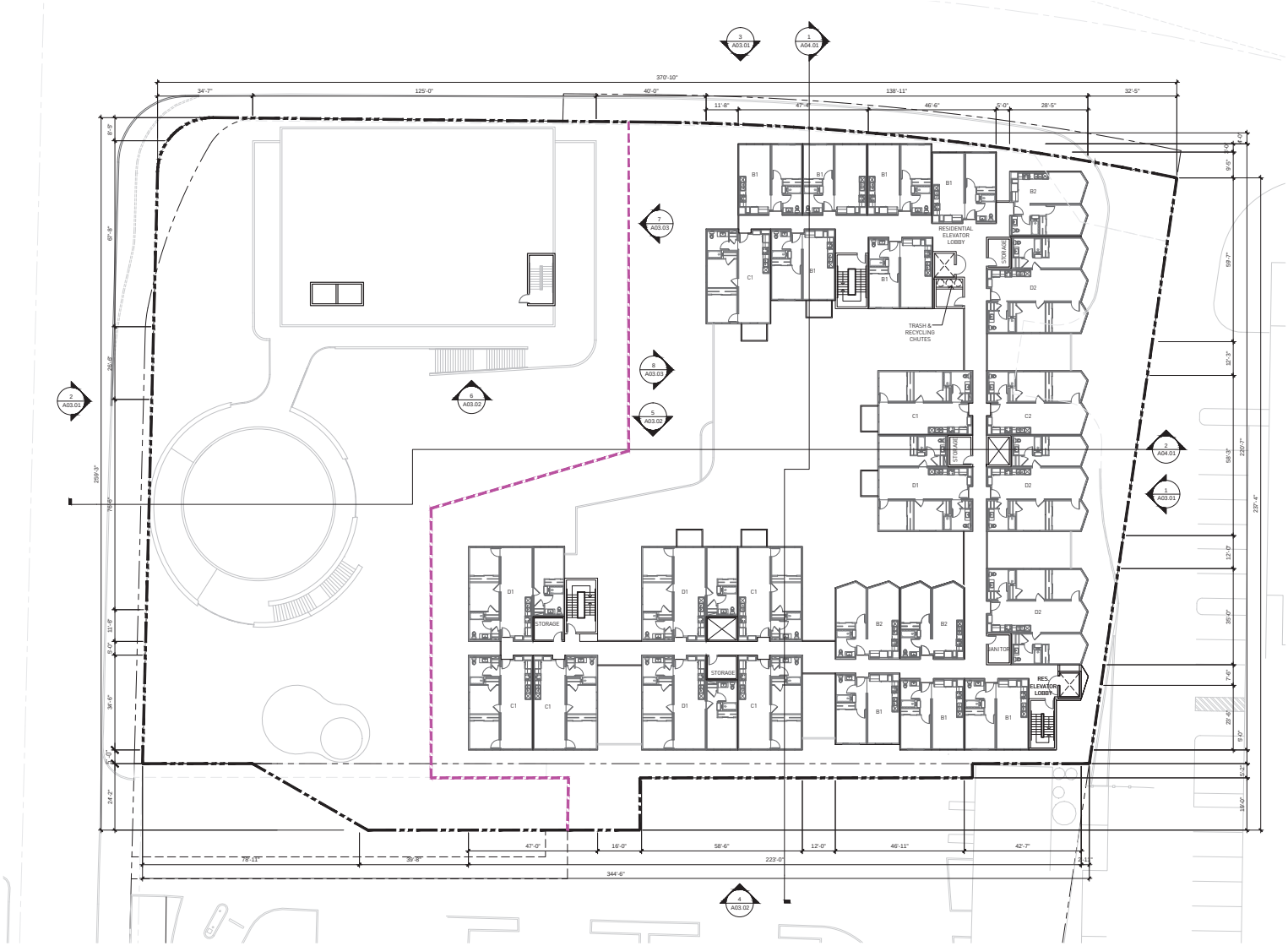
SOURCE: Studioneleven, 2024

FIGURE **15**

IMPACT SCIENCES

Floor Plans - Level 4

1577.001•05/24



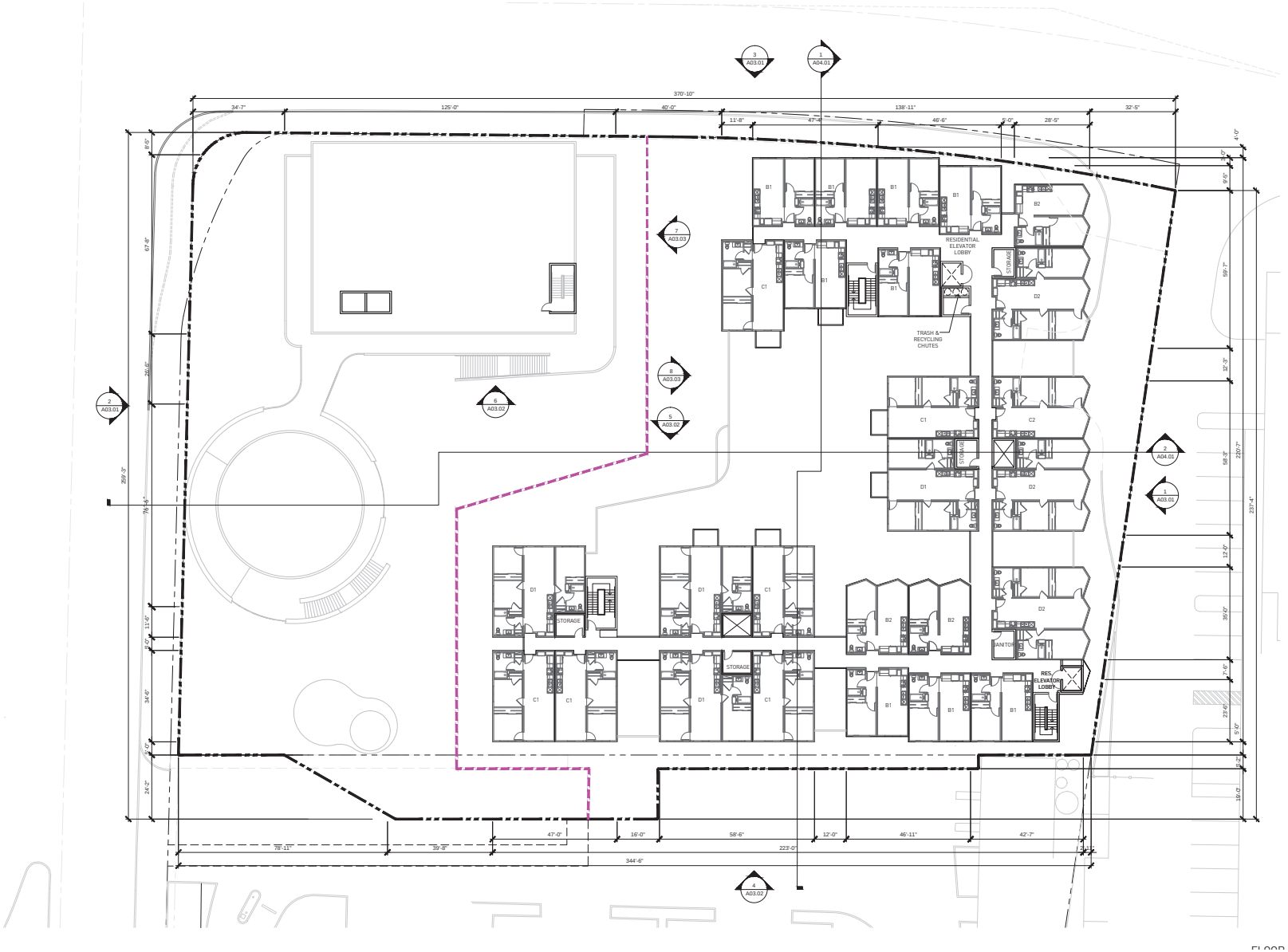
SOURCE: Studioneleven, 2024

FIGURE **16**

IMPACT SCIENCES

Floor Plans - Level 5

1577.001•05/24



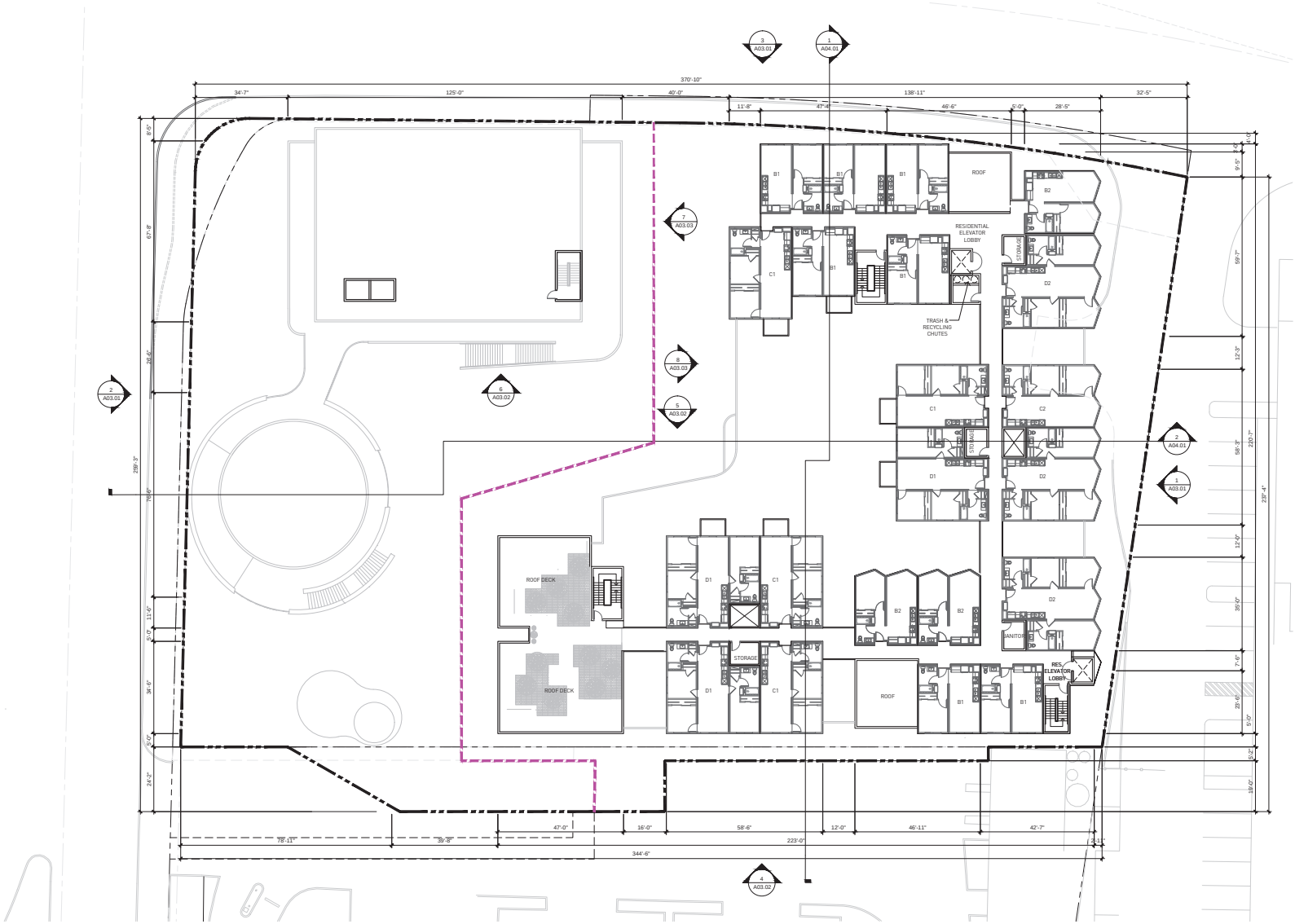
SOURCE: Studioneleven, 2024

FIGURE **17**

IMPACT SCIENCES

Floor Plans - Level 6

1577.001•05/24



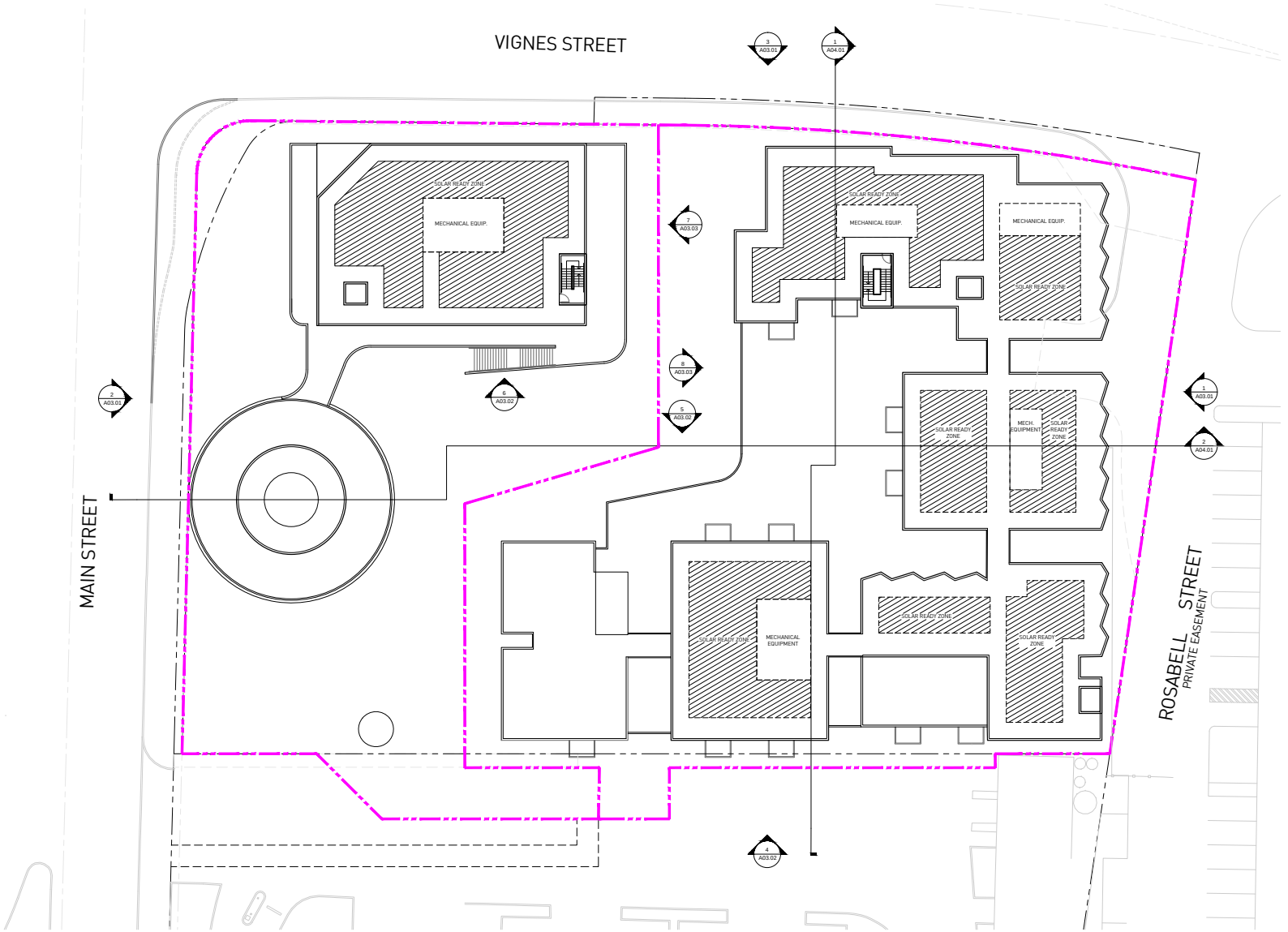
SOURCE: Studioneleven, 2024

FIGURE **18**

IMPACT SCIENCES

Floor Plans - Level 7

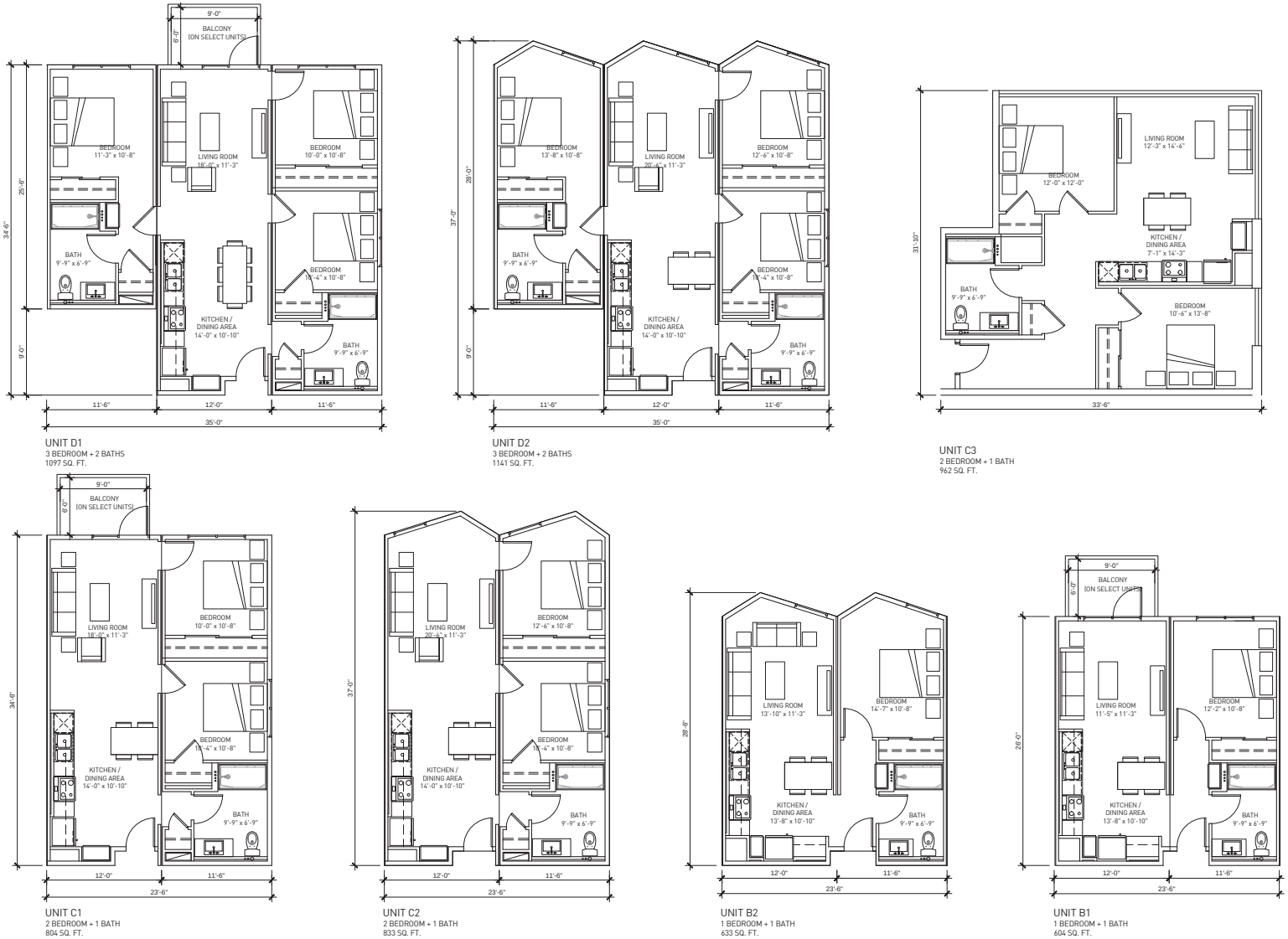
1577.001•05/24



SOURCE: Studioneleven, 2024

FIGURE **19**

Roof Plans



SOURCE: Studioneleven, 2024

FIGURE **20**

IMPACT SCIENCES

Typical Unit Layouts

SOURCE: Studioneleven, 2024

FIGURE **21**

Building Elevations North, East + West

IMPACT SCIENCES

1577.001•05/24

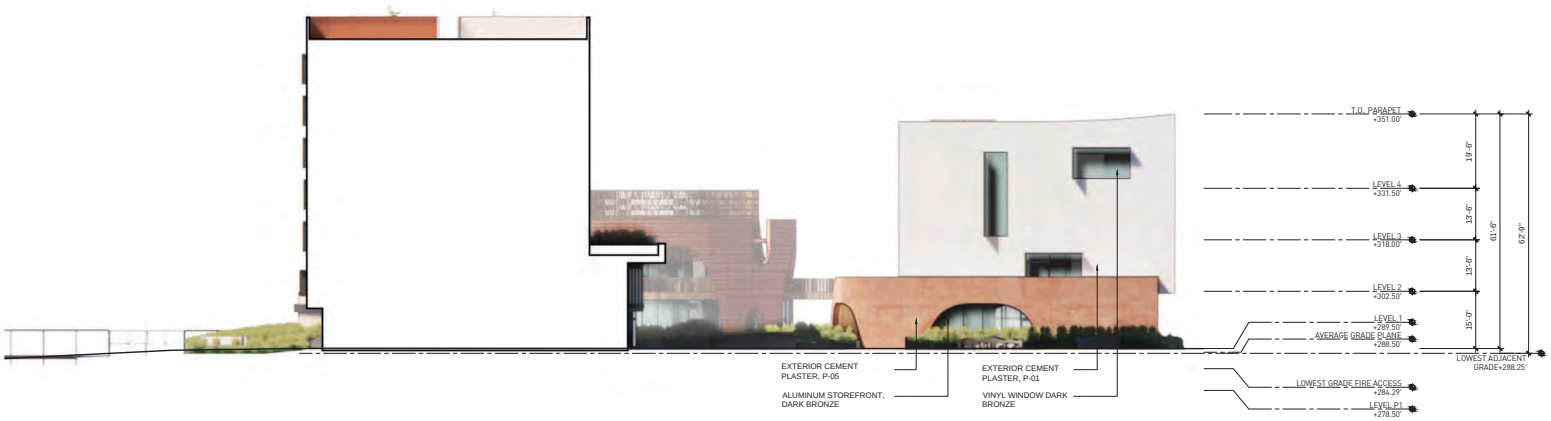
SOURCE: Studioneleven, 2024

FIGURE **22**

Building Elevations South, Interior Building Elevations North + South

IMPACT SCIENCES

1577.001•05/24



INTERIOR ELEVATION - EAST 7

1/16" = 1'-0"

INTERIOR ELEVATION - WEST 8

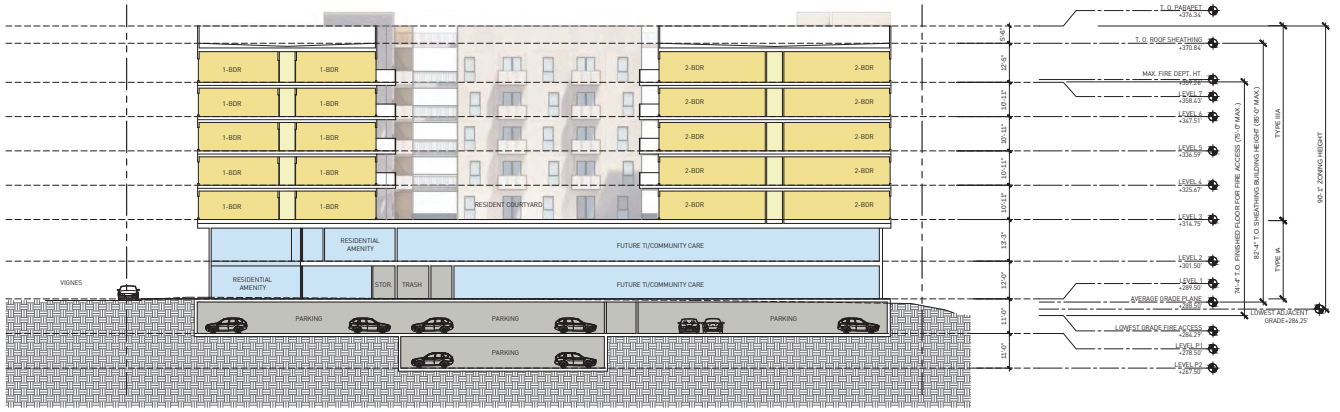
1/16" = 1'-0"

SOURCE: Studioneleven, 2024

FIGURE **23**

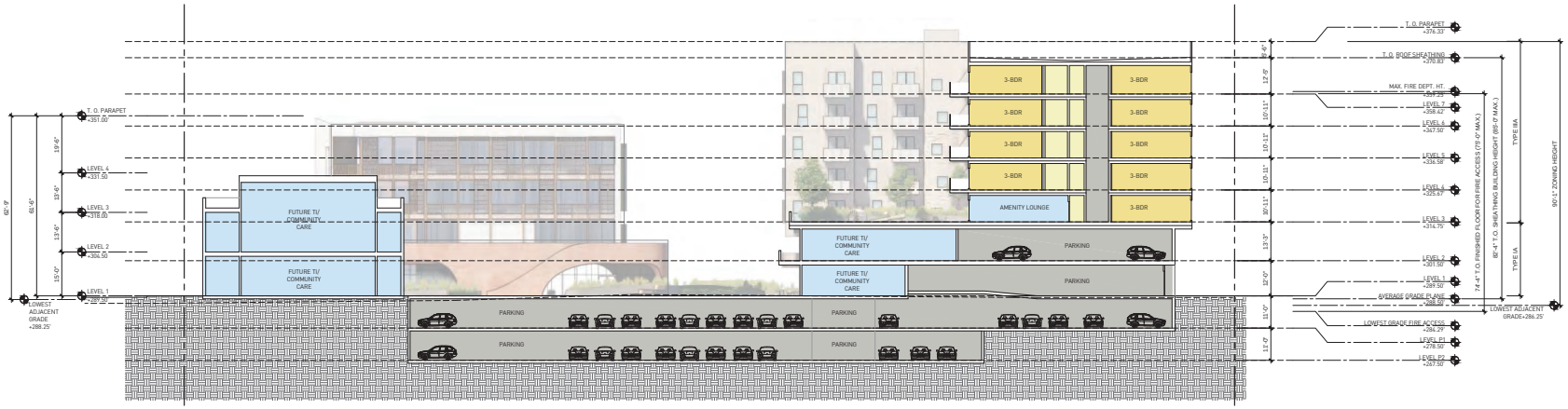
IMPACT SCIENCES

Interior Building Elevations East + West



NORTH-SOUTH BUILDING SECTION **1**

1/16" = 1'-0"



EAST-WEST BUILDING SECTION B-B **2**

1/16" = 1'-0"

SOURCE: Studioneleven, 2024

FIGURE **24**

Building Sections

Table 2.1-1
Project Development Program and Zoning Summary

	Permitted ADP-RIO	Proposed
Lot Area	86,036 sq ft (1.98 acres)	
Density		
ADP-RIO	213 Units	124 units (100% restricted affordable for Lower Income Households excluding managers' units)
Affordable Units		
1-Bed **2-Bed** **3-Bed** **Subtotal**	58 Apartments 31 Apartments 33 Apartments 122 Apartments	
Manager Units (2-Bed)	2 Apartments	
Floor Area Ratio (FAR)	4.20:1 Max	East Phase 3.05:1 West Phase 1.01:1
Building Area	East Phase: 213,247 sq ft West Phase: 148,100 sq ft Total: 361,347 sq ft	East Phase: 154,665 sq ft West Phase: 38,828 sq ft Total: 193,493 sq ft
Building Height	400'-0"	East Phase 90'-1" West Phase 62'-9"
Setbacks		
Front Yard - Main St **Side Yards - Vignes & Interior TCE Pl** **Rear Yard – Rosabell St**	0 feet 0 feet 0 feet	0 feet 0 feet 0 feet
Open Space		
Private (Balcony) **Ground Level (Residential Gathering)** **Third Level (Residential Courtyard)** **Seventh Level**	15,700 sq ft Total	16,200 sq ft Total 1,200 sq ft 4,500 sq ft 8,000 sq ft 2,500 sq ft
Parking, Vehicle		
Residential **Commercial**	0 Total Spaces[5] 0 spaces 0 spaces	215 Total Spaces 40 spaces 175 spaces

5 Per AB 2097, public agencies or cities are prohibited from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop, thus no on-site parking spaces are required. However, the Project Applicant has included on-site parking as part of the Proposed Project for practical operational reasons.

	Permitted ADP-RIO	Proposed
Parking, Bicycle		
Residential **Commercial**	122 Total Spaces 87 Long-term 9 Short-term 16 Long-term 10 Short-term	123 Total Spaces 88 Long-term 9 Short-term 16 Long-term 10 Short-term

Source: studioneleven, PZA Resubmittal, March 15, 2024.

Open Space

As noted above, the Project would include a total of 16,200 sq ft of residential open space which includes 1,200 sq ft of private balconies, 4,500 sq ft of 'residential gathering' space, 8,000 sq ft of 'residential courtyard' space, and 2,500 sq ft of roof decks on the seventh level.

Parking and Site Access

The Project Site currently provides 155 surface parking spaces, including the TCE parking lot, up to 35 of which would be removed by Project construction to allow for an accessible pedestrian path of travel to the main TCE campus. At buildout, the Project would include up to 215 new parking spaces (40 residential parking spaces and up to 175 commercial parking spaces), of which a total of eight spaces would be handicap accessible.[6] Parking areas would be provided on one at-grade level, one above grade level, and two below-grade levels. Both the podium and subterranean parking structures would be fully enclosed and hidden from view. Ingress and egress to the residential parking areas and a loading dock would be provided from Rosabell Street, on the eastern side of the Project Site. Access to the community care/commercial parking would be provided from Bauchet Street via Alameda Street.

The Project would provide bicycle parking spaces and bicycle amenities per the City's Bicycle Parking Ordinance No. 185,480, including 88 long-term and nine short-term bicycle parking spaces for residential use and 16 long-term and 10 short-term bicycle parking spaces for commercial use. Long term bike parking would be located on the ground floor amenity space and short-term bike parking would be just outside of the amenity space entrance off of Vignes Street. The Project has been intentionally designed this way in order to encourage bicycle and alternative mobility usage for all residents, employees, and visitors. Within the ground floor garage level parking, there would be approximately 100 sq ft of workshop space to allow residents to make repairs or modifications to their bikes. The main driveways off Rosabell Street and Bauchet Street would provide sufficient driveway widths for service vehicles and fire trucks to access to the Project Site.

6 Per AB 2097, public agencies or cities are prohibited from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop, thus no on-site parking spaces are required. However, the Project Applicant has included on-site parking as part of the Proposed Project for practical operational reasons.

Landscaping

As noted above, the Project would include 16,200 sq ft of residential open space and includes 1,200 sq ft of private balconies, 4,500 sq ft of 'residential gathering' space, 8,000 sq ft of 'residential courtyard' space, and 2,500 sq ft of roof decks. A minimum of 25 percent of the provided common open space would be landscaped. The landscape design would be developed in a manner which includes a variety of drought-tolerant and native species appropriate for the Southern California climate.

Lighting

All pedestrian walkways and open spaces areas will be illuminated with ambient night lighting for safety and access. Lighting will complement and highlight the architectural details, while being shielded from the adjacent residences. As the majority of the common open space is located at the center of the site, residents may utilize these common spaces after typical daytime hours without disturbing adjacent residences. All on-site common open space lighting will be oriented inward, while ambient lighting will gently illuminate spaces along the street.

Sustainability

The Project is designed to meet the latest in California building codes, including the building energy efficiency standards for residential and nonresidential buildings, California Energy Code, Title 24, Part 6 2022 (Title 24, 2022 edition), and the California Green Building Standards Code (CALGreen) standards.

Construction

For purposes of this analysis, it is estimated that the Project would be constructed in approximately 22 months with construction beginning in 2027 and project operations commencing by 2028. While construction may begin at a later date and/or take place over a longer period, these assumptions represent the earliest and fastest build-out potential resulting in a worst-case daily impact scenario for purposes of this analysis. The Project Site currently consists of a surface parking lot and no structural demolition will be required. This analysis assumes construction would be undertaken with the following primary construction phases: (1) Grading (including excavation), and (2) Structural Building and Finishing.

Grading, excavation and foundation preparation would occur for approximately three months. Approximately 55,800 cubic yards of soil will be exported to accommodate the two levels of subterranean parking. Building construction would occur for approximately 19 months and would include the construction of the proposed structures, connection of utilities, architectural coatings, and paving the Project Site. Architectural coating and paving are assumed to occur over the final two months of the building construction phase.

Construction off-haul materials would be disposed of in accordance with the City's Construction and Demolition Debris Recycling and Reuse Ordinance. Truck trips are expected to reach the Project Site from US 101 via local streets including E. Cesar Chavez Avenue and N. Alameda Street. Truck trips for off-haul of excavated materials are expected to travel along N. Alameda Street, N Los Angeles Street, US 101, and Interstate 10 from the Project Site to a disposal site in Irwindale, CA.

3.0 ENVIRONMENTAL IMPACT ANALYSIS

3.1 AESTHETICS & SCENIC RESOURCES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Have a substantial adverse effect on a scenic vista?	Yes	No	No	No	No mitigation required	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No	No	No	No	Not Applicable	No
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No	No	No	No	No mitigation required	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Yes	No	No	No	Yes; see below	No

Impact Determination in the ADSP FEIR

The ADSP FEIR identified Phase I impacts to on-site visual character and viewsheds and concluded that these impacts would be significant. Key views or scenic resources impacted include historic views of Union Station and the Terminal Annex. Specifically, alteration of the viewshed looking north from the intersection of N. Alameda Street and Los Angeles Street, impacts to views of the Terminal Annex, and obstruction of views of Union Station Passenger Terminal from the south and southwest were considered to be significant. Phase I impacts related to shade/shadow were determined to be significant. Mitigation was determined to be infeasible for these impacts. Therefore, these impacts were identified as significant and unavoidable in the ADSP FEIR.

The ADSP FEIR determined impacts to views of Union Station, Phase I impacts related to artificial light, and Phase I wind impacts would be less than significant. Although artificial light impacts were less-than-significant, the ADSP FEIR included mitigation measures to further minimize lighting impacts. The ADSP FEIR determined wind impacts would be less than significant with mitigation.

Project Changes and Comparison of Environmental Impacts

Consistent with SB 743, aesthetics do not apply to projects that are located in a transit priority area and are defined as set forth in Public Resources Code Section 21099. Per SB 743, aesthetic impacts for such projects are less than significant. As the Project is located in a transit priority area, aesthetic impacts are less than significant. However, for the purpose of this analysis aesthetic impacts are discussed below.

The Project would include the construction of an approximately 193,493 sq ft mixed-use affordable housing complex. The Project includes two phases, the East Phase, which would include 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units) residential amenity and support offices, community care/commercial space, and 40 at-grade and above-grade parking spaces for residents within the podium levels of the building. The West Phase would include additional community care facilities, and a two-level subterranean parking structure to accommodate up to 175 commercial parking spaces. The Project would also include a pedestrian connection between the new TCE Main, Los Angeles development and the existing TCE parking lot and the TCE building to the south.

The Specific Plan and certified ADSP FEIR evaluated the development of 1,307,000 sq ft of commercial and government office, conference center and retail development on the Terminal Annex site. The Project proposes to develop the site with a mixed-use affordable housing complex with community support services and a two-level subterranean parking structure, a use supported by the land use and zoning designation. The tallest component of the proposed Project is the seven-story mixed-use building that would reach a maximum height of 90 feet, approximately 310 feet lower in height than the maximum height anticipated on the Terminal Annex Site of the ADSP FEIR. The mixed-use building would result in changes to the visual environment that are less severe than those anticipated in the ADSP FEIR due to the reduction in building height and massing.

Since certification of the ADSP FEIR, a four-story residential building has been constructed north of Union Station, intervening between the Station and the Terminal Annex further north. Due to the height and bulk of the new residential building, views through the Union Station property from the south and southwest are now predominately obscured. Views of the Project Site from the

intersection of N. Alameda Street and Los Angeles Street are also obstructed by the residential building and other elements of the built environment, including signage, street trees, and other infrastructure. Given the height of the proposed buildings, ranging from 40 feet to 90 feet, these structures would only be partially visible from these vantage points.

The Project would have artificial light and shade/shadow impacts as Identified In the ADSP FEIR, but at a lesser level of impact because the proposed building height is approximately 310 feet lower in height than the maximum building height anticipated in the ADSP FEIR for the Project Site. Nonetheless, implementation of mitigation measures included in the ADSP FEIR to reduce artificial light impacts would apply to the Project. These measures require the use of light shielding devices and/or fixtures for exterior lighting and identification by the City of any Project design features or modifications that would reduce shadow impacts on adjacent buildings.

Although not included in the current *CEQA Guidelines* environmental checklist, implementation of the Project would result in wind impacts as identified in the ADSP FEIR (Section F.2) for the Project Site. The ADSP FEIR determined wind impacts would be less than significant with mitigation. The mitigation measures identified address outdoor seating areas and spacing between high-rise developments.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of this question is provided below.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

According to the California Scenic Highway Mapping System, the Project Site is not within or adjacent to an officially designated or eligible state scenic highway.[7] The closest scenic highway is Highway 110, just over 0.5 miles northwest of the Project Site. Therefore, implementation of the Project would not damage scenic resources, such as rock outcroppings or historic buildings within a state scenic highway, and no impact would occur. Therefore, no new significant impacts would occur with Project implementation.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project Site is bound by Main Street to the west; Vignes Street to the north; Rosabell Street and the surface parking lot of the USPS Carrier Annex to the east, and the surface parking lot for the TCE offices and conference center to the south. The Project Site is developed with a surface parking lot. The Project Site is not located in a non-urbanized setting, therefore there is no potential to degrade any existing visual character or quality of public views of the site and its surroundings.

7 Caltrans, "California State Scenic Highways." Available online at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed March 8, 2024.

Final EIR Mitigation Measures

The ADSP FEIR did not identify specific mitigation measures for Phase I aesthetic impacts, but did require consistency and compliance with the Specific Plan, as described above. The Project would comply with all applicable design guidelines in the Specific Plan and general design guidelines applicable to projects in the City. Implementation of **Mitigation Measures K.1.1.a** through **K.1.1.d** would be required to reduce glare and artificial light impacts. These measures require light shielding devices and other design details to prevent light spillover. Implementation of **Mitigation Measure F.2.1** to address wind impacts would apply to the Project.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to aesthetics in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.2 AGRICULTURAL & FORESTRY RESOURCES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use?	No	No	No	No	Not Applicable	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No	No	No	No	Not Applicable	No
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or a timberland production zone (as defined by Public Resources Codes 1220(g), 4526, and 51104(g) respectively?	No	No	No	No	Not Applicable	No
d) Result in a loss of forest land or conversion of forest land to non-forest use?	No	No	No	No	Not Applicable	No
e) Involve other changes in the existing environment which, due to their location and nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No	No	No	No	Not Applicable	No

Impact Determination in the ADSP FEIR

The ADSP FEIR was scoped using an Initial Study checklist in 1993. The checklist included one criterion relating to agriculture: "Will the proposal result in reduction in acreage of any agricultural crop?" The checklist analysis determined implementation of the Specific Plan would have no impact to agricultural land. Therefore, this topic was not further analyzed in the ADSP FEIR.

Project Changes and Comparison of Environmental Impacts

The General Plan land use designation of the Project Site is Regional Center Commercial, and the Project Site is zoned Alameda District Specific Plan Zone (ADP-RIO). The current land use and zoning is not agricultural. No agricultural land or forest land is located within the Project Site or nearby.

New CEQA Significance Thresholds

The following questions were added to the CEQA Environmental Checklist after the ADSP FEIR was certified. To complete analysis of the Project under current CEQA thresholds, this addendum includes all current CEQA Guidelines environmental checklist questions.

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural uses?

According to the Department of Conservation, the Project Site is mapped as "urban and built up land", and no portion of the Project area is designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No conversion of farmland would occur, as the Project Site is not classified as farmland of any kind.[8] The Project would therefore have no impact on agricultural lands. Therefore, no new significant impacts would occur with Project implementation.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

As previously discussed, the Project Site is not designated for agricultural use, and the Project uses would not conflict with any existing farmland agricultural zoning. There are no Williamson Act contracts on or near the Project Site. Therefore, the Project Site does not conflict directly or indirectly with any existing zoning or Williamson Act contracts for agricultural uses. Therefore, no new significant impacts would occur with Project implementation.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or a timberland production zone (as defined by Public Resources Codes 1220(g), 4526, and 51104(g) respectively?

The Project site is located in an urbanized area. The Project Site and surrounding area is not zoned for forest or timberland, and no forest land or timberlands exist on or near the site. Therefore, the Project would not conflict with existing zoning or cause rezoning of forest land or timberland. Therefore, a new significant impact would not occur with Project implementation.

8 California Department of Conservation, *California Important Farmland Finder*, 2022. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed March 8, 2024.

d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?

The Project Site is in an urbanized area and is currently developed with a parking lot. As previously discussed, no forest land or timberland is present on the Project Site. Therefore, implementation of the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

There are no ADSP FEIR mitigation measures for agricultural impacts.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to agricultural resources in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.3 AIR QUALITY

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Conflict with or obstruct implementation of the applicable air quality plan?	Yes	No	No	No	No mitigation required	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Yes	No	No	No	Yes; see below	No
c) Expose sensitive receptors to substantial pollutant concentrations?	Yes	No	No	No	No mitigation required	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Yes	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined Phase I construction and operational impacts to air quality would be significant. Construction of Phase I would result in significant emissions of carbon monoxide (CO), reactive organic compounds (ROC), nitrogen oxide (NOx), and respirable particulate matter (PM10). Operation of Phase I development would result in significant emissions of CO, ROC, and NOx. Mitigation measures were developed to minimize air quality impacts; however, after mitigation impacts would remain significant and unavoidable.

The ADSP FEIR concluded that odors could occur during excavation, if contaminated soils produced odors. However, odors would occur only in the short term, and no sensitive receptors were present at the time the ADSP FEIR was certified. Therefore, odor impacts were determined to be less than significant.

The ADSP FEIR also identified potential hazards related to exposure of construction workers to contaminated soils and asbestos. Mitigation measures for air quality and hazards/hazardous materials impacts would ensure construction workers are not exposed to contaminated soils or asbestos.

The total Phase I construction and operational emissions anticipated in the ADSP FEIR, along with South Coast Air Quality Management District (SCAQMD) thresholds used in the ADSP FEIR, are summarized in **Table 3.3-1, Regional Phase I Construction and Operational Emissions,** below.

Table 3.3-1
Regional Phase I Construction and Operational Emissions

Phase I Construction Emissions (pounds per day)	**CO**	**ROC**	**NOx**	**SOx**	**PM10**
Total Emissions	620.61	3,098.66	198.86	4.58	776.67
SCAQMD Thresholds	550.00	75.00	100.00	150.00	150.00
Significant Impact (Yes/No)	**Yes**	**Yes**	**Yes**	**No**	**Yes**
Phase I Operations Impacts (pounds per day)	**CO**	**ROC**	**NOx**	**SOx**	**PM10**
Total Emissions	3,457.49	196.97	313.46	0.09	47.03
SCAQMD Thresholds	550.00	55.00	55.00	150.00	150.00
Significant Impact (Yes/No)	**Yes**	**Yes**	**Yes**	**No**	**No**

Source: Alameda District ADSP FEIR. 1996.

Project Changes and Comparison of Environmental Impacts

The ADSP FEIR anticipated that the Project Site would be developed with mixed-use and office uses. However, the ADSP permitted mixed uses including office, residential, retail, hotel, theater, stadium, and entertainment uses. In order to ensure flexibility of uses for the Project Site for the future, the ADSP FEIR considered a high impact component of office as constituting the majority of new space. As opposed to the commercial uses anticipated in the ADSP FEIR, the Project proposes to develop an approximately 193,493 sq ft mixed-use affordable housing complex.

Current SCAQMD thresholds for construction and operational emissions, along with projected emissions from the Project, are shown below in **Table 3.3-2**, **Regional Project Construction and Operational Emissions (Maximum Pounds per Day).**

Table 3.3-2
Regional Project Construction and Operational Emissions (Maximum Pounds per Day)

Project Construction						
Construction Year	**ROC**	**NOx**	**CO**	**SO2**	**PM10**	**PM2.5**
2027	1.52	20.90	18.80	0.07	5.49	2.49
2028	26.70	14.60	18.80	0.07	3.03	1.00
SCAQMD Threshold	*75.00*	*100.00*	*550.00*	*150.00*	*150.00*	*55.00*
Exceed?	***No***	***No***	***No***	***No***	***No***	***No***
Project Operations						
Operational Source	**ROC**	**NOx**	**CO**	**SO2**	**PM10**	**PM2.5**
Mobile Source	4.56	3.14	33.40	0.08	7.57	1.96
Area Source	37.70	2.69	75.70	0.16	8.87	8.70
Energy Use	0.03	0.49	0.29	< 0.01	0.04	0.04
Total Emissions	42.29	6.32	109.39	0.25	16.48	10.70
SCAQMD Thresholds	*55.00*	*55.00*	*550.00*	*150.00*	*150.00*	*55.00*
Exceed?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Impact Sciences, 2024. See ***Appendix A.***

The Project would generate construction and operational air quality emissions in a manner consistent with what was contemplated in the ADSP FEIR. Furthermore, as shown in **Table 3.3-2**, the Project would not exceed SCAQMD regional thresholds of significance.

In addition to the regional thresholds, the SCAQMD has developed Localized Significant Thresholds (LSTs). LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. The Project is located within SRA 1, Central Los Angeles County. The Project's construction emissions were compared against a LST for a two-acre project site with a sensitive receptor distance of 50 meters, as shown in **Table 3.3-3, Localized Project Construction Emissions (Maximum Pounds per Day).**

Table 3.3-3
Localized Project Construction Emissions (Maximum Pounds per Day)

Construction Year	NOx	CO	PM10	PM2.5
Grading/Foundation Preparation	12.20	13.90	3.30	1.84
SCAQMD Localized Thresholds	*106.00*	*1,368.00*	*25.00*	*7.00*
Building Construction	13.19	17.50	0.43	0.38
SCAQMD Localized Thresholds	*106.00*	*1,368.00*	*25.00*	*7.00*
Exceed?	***No***	***No***	***No***	***No***

*Source: Impact Sciences, March 2024. See **Appendix A** to this report.*
Notes: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
The building construction emission total includes architectural coating and paving emissions.

As shown in **Tables 3.3-2 and 3.3-3**, the Project would not exceed any thresholds established by the SCAQMD. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures F.1.2.a** through **F.1.2.c** would be required to minimize operational air quality impacts to the extent feasible. These measures require the application of energy-saving design features where feasible. Implementation of **Mitigation Measures F.1.1.a** through **F.1.1.l** would be required to minimize construction air quality impacts to the extent feasible. These mitigation measures require compliance with best management practices (BMPs) to reduce dust and equipment emission during construction and require measures to reduce construction period traffic.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to air quality in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.4 BIOLOGICAL RESOURCES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a.) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No	No	No	No	Not Applicable	No
b.) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No	No	No	No	Not Applicable	No
c.) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No	No	No	No	Not Applicable	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
d.) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No	No	No	No	Not Applicable	No
e.) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No	No	No	No	Not Applicable	No
f.) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No	No	No	No	Not Applicable	No

Impact Determination in the ADSP FEIR

The Initial Study prepared for the ADSP FEIR determined implementation of the Specific Plan would not have the potential to impact biological resources. Therefore, this topic was not further analyzed in the ADSP FEIR. The ADSP FEIR did not provide an analysis of impacts to trees.

Project Changes and Comparison of Environmental Impacts

The Project Site is located within an urbanized area, consistent with the urbanized conditions described in the ADSP FEIR. Due to the urbanized nature of the Project Site, no ecologically sensitive areas exist on the site, and the potential to encounter threatened or endangered species or their habitats on the site is so low as to be considered negligible. Additionally, the site's land use, zoning designations, and surrounding land uses further support this determination.

New CEQA Significance Thresholds

The Initial Study checklist used to scope the ADSP FEIR is different from the 2024 CEQA Guidelines checklist, in terms of both language and discussion of each impact. As a result, the analysis of biological resources provided here for the Project is more robust. To complete analysis of the Project under current CEQA thresholds, this addendum includes all current CEQA Guidelines environmental checklist questions.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

As previously discussed, the Project Site and surrounding area is highly developed and is not a suitable habitat for any candidate, sensitive, or special status species. The tree inventory (provided in **Appendix B**) identified a total of 95 trees within and immediately adjacent to the Project site consisting of 43 native trees that meet the definition of a protected tree species under the Los Angeles Native Tree and Shrub Protection Ordinance and 52 non-protected trees. Project development is expected to result in the removal of six Peruvian pepper trees (*Schinus molle*) a non-protected tree species. An additional 24 trees will experience minor disturbance (removal of concrete curbs) within their Tree Protection Zone (TPZ). These trees consist of eight western sycamores *(Platanus racemosa*) a protected tree species, along with ten Peruvian pepper trees and six coast redwoods (*Sequoia sempervirens*) both non-protected species. Implementation of the BMPs (described below**)** are anticipated to adequately protect trees to be retained during construction. Additionally, the Project would comply with all regulations established in the City's Protected Tree and Shrub ordinance.

Best Management Practices

- A Certified Arborist shall be retained to oversee any construction activities that may affect trees to be retained.

- For all trees in the vicinity of the Project construction area to be retained (including street trees), a TPZ shall be delineated according to the procedures provided by the City. The radius of each TPZ will be determined by multiplying the diameter at standard height (dsh) by 12 and installing conspicuous protective fencing to show the limits of the TPZ. The fencing shall be installed prior to any soil disturbing activities and shall not be removed until all ground disturbing activities in the vicinity of these trees is complete.

- The TPZs for all trees to be retained during construction activities should be represented on Project construction plans.

- No storage or operation of equipment or materials will be allowed within any TPZ. Spill kits should always be present so that accidental spills of harmful products near a TPZ can be immediately cleaned up.

- No ground disturbance shall occur within any TPZ. If any excavations within a TPZ become unavoidably necessary, work shall be constructed using only hand-held tools. The Certified Arborist shall be present for any such disturbance within the TPZ or during any tree trimming that requires removal of branches greater than 3 inches in diameter or pruning that affects more than 10 percent of an individual tree's canopy.

- The Certified Arborist shall be responsible for evaluating the condition of trees to be retained at the conclusion of construction activities. This evaluation will determine if Project activities negatively affected the trees' health and whether additional replacement trees are needed.

- A tree performance bond (per Section 17.05, Subsection R[4][d]) shall be provided in an amount that is acceptable to the City of Los Angeles to ensure that any relocated and replacement trees are successfully established.

- The Certified Arborist shall be responsible for monitoring the health and establishment of replacement trees that are required as part of the Project.

Although the Project Site is not a suitable habitat for any candidate, sensitive, or special status species, it is possible that the trees within the Project Site could provide nesting habitat for birds. Active nests, adults, eggs, and the young of most species of birds are protected under the federal Migratory Bird Treaty Act. Since impacts to the trees on the Project Site could occur, compliance with the Migratory Bird Treaty Act would be required. Tree removal would be completed outside of the nesting bird season, or if tree removal is completed during nesting bird season, a survey of the trees to be removed will be completed prior to removal to ensure nesting birds would not be disturbed. Implementation of the Project would not adversely impact nesting birds on the Project Site. Therefore, no new significant impacts would occur with Project implementation.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The Project Site and surrounding area is highly urbanized and no sensitive riparian or natural communities are present within the vicinity of the Project Site. There are no aquatic, wetland, or riparian habitat, or other sensitive natural communities on the Project Site. Therefore, implementation of the Project would not have a substantial adverse effect on any riparian or sensitive natural communities identified by regional plans, policies, regulations, or California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, no new significant impacts would occur with Project implementation.

c) Would the project have a substantial adverse effect c) on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project Site does not contain any jurisdictional wetlands or Waters of the United States. According to the National Wetlands Inventory, the closest wetland to the Project Site is the Los Angeles River, located 0.4 miles to the east.[9] Therefore, implementation of the Project would not impact jurisdictional wetlands, and no new significant impacts would occur with Project implementation.

9 United States Fish & Wildlife Service, "National Wetlands Inventory." Available online at: https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper, accessed March 8, 2024.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?

As previously discussed, the Project Site is currently developed with surface parking and is surrounded by office, residential, civic, and industrial development, which inhibits wildlife movement. The Project Site is in close proximity to US-101 and rail corridors associated with Union Station. Due to the existing conditions of the Project Site, wildlife movement opportunities are heavily constrained. As no waterways or other aquatic environments are present on the site and any removal of trees on the site that could serve as a habitat for birds would done be in compliance with the Migratory Bird Treaty Act, implementation of the Project would not have the potential to interfere with the movement of wildlife or impact wildlife nursery sites, and no new significant impacts would occur with Project implementation.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project would comply with any and all local policies or ordinances, such as the City's Native Tree Protection Ordinance and would adhere to all City guidance regarding biological resources. The Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no new significant impacts would occur with Project implementation.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The County of Los Angeles (County) created the Significant Ecological Areas (SEA) Program to officially identify areas within Los Angeles County that contain irreplaceable biological resources. The SEA Program seeks to conserve genetic and physical diversity within the County by designating biological resource areas that are capable of sustaining themselves into the future. According to maps from the General Plan SEA Policy Map indicate that there are no SEAs found in the City.[10]

The Wildlife Ordinance, proposed to elevate sustainability in the development process, was approved in 2023 by the City Council's Planning and Land Use Committee; the Ordinance is presently being review by the City Attorney's office. However, the Wildlife Ordinance has not been adopted.

No habitat plan or natural community conservation plans have been adopted that include the Project Site. Therefore, implementation of the Project would not conflict with any conservation plans, and no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

There are no ADSP FEIR mitigation measures for biological impacts.

10 County of Los Angeles, *Significant Ecological Areas and Coastal Resource Areas Policy Map,* 2019. Available online at: https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf, accessed March 15, 2024.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to biological resources in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.5 CULTURAL RESOURCES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a.) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines?	Yes	No	No	No	Yes; see below	No
b.) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines?	Yes	No	No	No	Yes; see below	No
c.) Disturb any human remains, including those interred outside of formal cemeteries?	No	No	No	No	Not Applicable	No

Impact Determination in the ADSP FEIR

The ADSP FEIR identified potentially significant Phase I and Buildout impacts to archaeological and paleontological resources. With mitigation, these impacts would be reduced to a less-than-significant level. The ADSP FEIR identified significant Phase I impacts to historic resources resulting from demolition at Union Station and a change in setting at Union Station from overall Phase I development. Mitigation measures were identified, however, a significant adverse effect to Union Station would still result, and therefore, the impact remains significant and unavoidable. Phase I impacts to the historic Terminal Annex were determined to be less than significant.

Project Changes and Comparison of Environmental Impacts

The ADSP FEIR identified potential significant impacts to undiscovered archaeological deposits and remains should excavation reach or exceed depths of 30 feet. According to the Preliminary Zoning Assessment submittal for the Project, the Project would require an excavation up to a depth of approximately 22 feet for subterranean parking. The excavation anticipated for the Project is less than what was identified in the ADSP FEIR. While potential for construction of the Project to encounter archeological and/or paleontological resources would be highly unlikely, implementation of the mitigation measures established in the ADSP FEIR will ensure that impacts would remain less than significant.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes a question that was not addressed in the ADSP FEIR. Analysis of this question is provided below.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Based on the information on subsurface conditions provided in the ADSP FEIR and historical use of the Project Site, it is unlikely that human remains would be encountered. According to the geotechnical investigation of the Project Site for the commercial and the residential components of the Project, artificial fill was encountered at a maximum depth of 2.5 feet below the existing ground surface; the fill is likely the result of past grading or construction activities at the site. In the event that remains are encountered, compliance with State law would ensure no significant impacts occur. If human remains are encountered unexpectedly during excavation, grading, or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

During construction, **Mitigation Measure C.1.1.a** through **C.1.1.e, Mitigation Measures C.2.1.a** through **C.2.1.i, and Mitigation Measures C.3.1 through C.3.3** would be required to prevent significant impacts to cultural resources. These mitigation measures provide protocols to be followed in the event that archeological and/or paleontological resources are encountered during construction. These measures require an on-site monitor when excavation may disturb sensitive layers of soil, and provide required steps if resources are encountered.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to cultural resources in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.6 ENERGY

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a.) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No					
b.) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No					

Impact Determination in the ADSP FEIR

The ADSP FEIR did not address energy resources under the official "Energy" checklist item for CEQA as we know it today, as it was not a required CEQA topic at the time. The Energy checklist item for CEQA's Appendix G was introduced in the 2019 update to the *CEQA Guidelines*. Appendix F of the *CEQA Guidelines* requires EIRs to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)). While Appendix F does not include checklist-style questions, it does provide guidance on potential impacts and mitigation measures for energy consumption impacts.

Section 3.19 of the ADSP FEIR, Energy Conservation, determined that Phase I and Buildout Phase impacts related to energy conservation would be significant. Construction of Phase I and Buildout Phase development would result in short-term significant impacts related to energy consumption from operation of construction equipment and construction worker travel. After mitigation, this impact would remain significant and unavoidable. Operation of Phase I and Buildout Phase would result in increased electrical consumption and could require the expansion of electrical infrastructure or construction of new electrical facilities. Mitigation measures would reduce operational phase impacts to a less than-significant level.

Project Changes and Comparison of Environmental Impacts

The ADSP FEIR anticipated the development of a mix of commercial and government offices, a conference center, and retail uses on the Project Site. The Project proposes to develop a 193,493

sq ft mixed-use complex that includes 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units), residential amenity and support offices, community care/commercial space, and 40 at-grade and above-grade parking spaces for residents within the podium levels of the building and up to 175 parking spaces in two subterranean levels. The operation of the Project would result in a reduced demand energy utilities than what was analyzed for this site in the ADSP FEIR. Furthermore, as discussed under **Section 2.0, Project Background and Description,** and **Section 3.7, Greenhouse Gas Emissions,** the Project would incorporate energy efficiency measures and be built to meet the latest in California building codes including the energy efficiency standards for residential and nonresidential buildings. Therefore, with mitigation described in the ADSP FEIR, no new or greater significant impact would occur.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of this question is provided below.

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Neither federal or State law nor the *State CEQA Guidelines* establish thresholds that define when energy consumption is considered wasteful, inefficient, and unnecessary. Compliance with CCR Title 24 Energy Efficiency Standards would result in energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. For example, energy would be required to transport people and goods to and from the Project Site. Energy use is discussed by anticipated use type below.

Construction

Construction activities would include the consumption in the form of gasoline and diesel fuel in order to power construction worker vehicle trips, hauling and materials delivery truck trips, and operation of construction equipment. Energy in the form of electricity may also be consumed by some pieces of construction equipment, such as power tools, lighting, etc.; however, the amount of consumed electricity would be relatively minimal. Indirect energy use would include the energy required to make the materials and components used in construction.

Construction equipment would be maintained to applicable standards, and construction activities and associated fuel consumption and energy use would be temporary and typical of construction sites. The Project Applicant would use fuel-efficient equipment consistent with State and federal regulations, such as the fuel efficiency regulations outlined in Title 24, which regulates energy resources and fuel consumption and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. It is also reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, construction activities associated with the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational

The Project would include the development of a new mixed-use complex that would include residential units and commercial uses. The Project would comply with the mandatory requirements set forth in the California Green Building Standards Code (CALGreen) related to energy efficiency, water efficiency and conservation, and material conservation and resource efficiency for new non-residential buildings. Additionally, the Los Angeles Department of Water and Power (LADWP) is required to comply with the State's Renewables Portfolio Standard, mandating that investor-owned utilities, electric service providers, and community choice aggregators must meet a 33 percent total procurement of eligible renewable energy resources by 2020 and 60 percent total procurement by 2030. This ensures that a portion of the electricity consumed during Project operations would be generated from renewable resources. Furthermore, the City of Los Angeles' Green Building Code requires that all new development be fully electric. No natural gas will be supplied to the Project.

Energy would also be consumed as a result of vehicle trips. Thus, Project operations would result in an increase in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The majority of the Project's vehicle fleet would consist of light-duty automobiles and light-duty trucks, which are subject to state fuel efficiency standards, such as the Low Carbon Fuel Standard (LCFS) and Low-Emission Vehicle Program Standards. The Low Carbon Fuel Standard, in part, aims to reduce fuel consumption and providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets the LCFS carbon intensity standards for each annual compliance period. However, given the close proximity to Union station and local bus routes, it is anticipated that these alternative modes of transportation will be greatly utilized by the future tenants/visitors of the site. Additionally, the development of an affordable housing complex designed to comply with CALGreen, Title 24, Part 6 of the California Code of Regulations, California Building Code and Energy Code standards, would ensure that energy efficiency is incorporated into the construction and operation of the Project.

The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. Therefore, no new significant impacts would occur with Project implementation.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As previously discussed, the Project would be designed to comply with CALGreen; Title 24, Part 6 of the California Code of Regulations; California Building Code and Energy Code standards, as applicable to the type of use being developed on the Site. The Project would also comply with measures that are presented in the Los Angeles Green New Deal by implementing different design elements that increase energy efficiency. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures M.4.1, M.4.2.a,** and **M.4.2.b** would be required to minimize energy consumption impacts to the extent feasible. These measures require compliance with the State Energy Conservation Standards (now CALGreen) and reduction of energy consumption during Project construction.

Conclusion

The Project would not substantially increase the severity of the previously anticipated energy use in the ADSP FEIR, and no new significant impact would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.7 GEOLOGY & SOILS

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a.) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:						
i.) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Yes	No	No	No	No mitigation required	No
ii.) Strong seismic ground shaking?	Yes	No	No	No	Yes; see below	No
iii.) Seismic-related ground failure, including liquefaction?	Yes	No	No	No	Yes; see below	No
iv.) Landslides?	Yes	No	No	No	No mitigation required	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
b.) Result in substantial soil erosion or the loss of topsoil during project construction and/or operation?	Yes	No	No	No	No mitigation required	No
c.) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	Yes	No	No	No	Yes; see below	No
d.) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No	No	No	No	Yes; see below	No
e.) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No	No	No	No	Not Applicable	No
f.) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature	Yes	No	No	No	Yes; see below	No

In 2015, the California Supreme Court, in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. Specially, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for the purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, the analysis associated with seismicity, soil stability, or expansive soils focuses on whether the project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

Impact Determination in the ADSP FEIR

The ADSP FEIR identified potentially significant Phase I impacts related to exposure of people and structures to severe ground shaking and seismic settlement, and exposure to unstable soils and on-site settlement resulting from construction activities. With mitigation, these impacts would be less than significant. All other impacts related to geology and soils were found to be less than significant. The geology and soils analysis in the ADSP FEIR also included impacts to water quality.

Project Changes and Comparison of Environmental Impacts

The Project Site is subject to the same general seismic and soils-related risks as those described in the Specific Plan. A geotechnical investigation of the Project Site was conducted for the commercial and the residential component of the Project in October 2023 and included a site reconnaissance, field exploration, laboratory testing, engineering analysis, and report preparation.[11] The results of these analyses are summarized in two geotechnical reports, included as **Appendix C** to this addendum. Recommendations from those analyses will be incorporated into the Project design as required by the City's standard practices and conditions of approval.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of this question is provided below.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

According to the geotechnical reports prepared for the Project, the existing site soils encountered at proposed foundation levels are considered to have low expansive potential, with the soils being classified as "non-expansive," based on the 2022 California Building Code. The Project Site is underlain by artificial fill and Holocene age alluvial deposits consisting of sand and silt with varying amounts of gravel and cobbles.

With implementation of applicable mitigation measures from the ADSP FEIR, the effect of expansive soils on building foundations would not be significant. Therefore, no new significant

11 Geocon West, Inc., *Geotechnical Investigation: Proposed Mixed-Use Affordable Housing Development/Proposed Commercial Development*. October 2023. See **Appendix C.**

impacts would occur with Project implementation.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. Septic tanks or alternative disposal systems are neither necessary nor are they proposed for the Project, as the Project would connect to the City's sewer system. As no septic tanks nor other alternative wastewater disposal systems are being implemented for the Project, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures H.1.1a** through **H.1.1c**., **H.1.2**, **H.2.1.a** through **H.2.1.e,** and **H.2.2.a** through **H.2.2.c** would be required to reduce geology and soils impacts to a less-than significant level. These measures require conforming to Los Angeles seismic regulations, a project specific geotechnical investigation, and soil and foundation report, along with potential grading and shoring plans. In October 2023, a site-specific geotechnical investigation was completed (included as **Appendix C** to this Addendum) as a means of assessing the reduction of risk concerning seismic settlement, fulfilling the requirements of **Mitigation Measure H.1.2**.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to geology and soils in the ADSP FEIR nor exacerbate existing conditions, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.8 GREENHOUSE GAS EMISSIONS

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a.) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No	No	No	No	Not Applicable	No
b.) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No	No	No	Not Applicable	No

Impact Determination in the ADSP FEIR

An evaluation of greenhouse gas (GHG) emissions was not a required CEQA topic at the time the ADSP FEIR was certified.

New CEQA Significance Thresholds

Since certification of the ADSP FEIR, questions related to GHG emissions have been added to the *CEQA Guidelines* Appendix G checklist. According to the 2024 CEQA Guidelines, a project would have a significant impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

2. Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gas emissions.

The Project's impact analysis is based on consistency with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions, such as AB 32, SB 32, AB 1279, the 2022 Scoping Plan, and the City's Green New Deal.

a) Would the project generate greenhouse gas a) emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction GHG Emissions

Section 15064.4(a) of the *State CEQA Guidelines* states, in part, that a lead agency shall make

a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. The Project would generate GHG emissions during temporary, short-term construction activities such as demolition, grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the site, asphalt paving, and construction worker motor vehicle trips. With the use of CalEEMod, GHG emissions associated with Project construction were calculated from off-road equipment usage, hauling vehicles, delivery, and worker trips to and from the site. According to CalEEMod calculations, the total GHG construction emissions would be approximately 1,213 MT CO_{2e}. However, these emissions would be temporary in nature and would represent a small portion of a Project's lifetime GHG emissions. As GHG emissions from construction activities would occur over a relatively short time span, it would contribute a relatively small portion of the lifetime GHG emission impact of the Project. The total construction GHG emissions were divided by 30 years to determine an annual construction emission rate to be amortized over the Project's first 30 years of operations, consistent with SCAQMD recommendations. Amortized over a 30-year period, the Project is anticipated to emit approximately 40 metric tons of carbon dioxide per year (MT CO2e/year). The operations of the Project would generate GHG emissions from the usage of energy, water, and generation of solid waste and wastewater. Emissions of operational GHGs are shown in **Table 3.8-1, Estimated Project Greenhouse Gas Emissions**.

Table 3.8-1
Estimated Project Greenhouse Gas Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)
Construction Emissions	40.00
Mobile Sources	1,163.00
Area Sources	44.20
Energy Sources	519.00
Water Sources	38.90
Waste Sources	51.30
Refrigerants	0.16
Total GHG Emissions	**1,856.56**

*Source: Impact Sciences, Inc. March 2024. See **Appendix A.***

As shown in **Table 3.8-1**, the Project would generate an estimated 1,856.56 metric tons (MT) of carbon dioxide equivalent (CO_2e). This quantified illustration of the Project's scope of GHG emissions is provided for informational purposes, and significance under CEQA is based on the Project's consistency with statewide and regional policies and plans to meet the state reduction goals set in AB 32, SB 32, and AB 1279 as outlined in CARB's 2022 Scoping Plan, SCAG's 2020 Connect SoCal RTP/SCS, and the City's Green Plan. GHG reduction plans are discussed in more detail under question **"b."**

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions?

Pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if a Project could conflict with applicable GHG reduction plans, policies, or regulations. The relevant adopted regulatory plans and regulations include: AB 32, SB 32, AB 1279 as outlined in CARB's 2022 Scoping Plan, SCAG's 2020 Connect SoCal Plan, and the City's Green Plan.

Consistency With AB 32, SB 32, AB 1279 & 2022 Scoping Plan

The Project would be consistent with applicable statewide regulatory programs designed to reduce GHG emissions consistent with AB 32, SB 32, AB 1279 and the 2022 Scoping Plan. In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the 2022 Scoping Plan for Achieving Carbon Neutrality on November 16, 2022 and it was approved on December 15, 2022.[12] The 2022 Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The 2022 Scoping Plan includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. As discussed in detail in Appendix D (Local Actions) of the 2022 Scoping Plan, local jurisdictions can do much to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—do not substitute for these local efforts. Multiple legal tools are open to local jurisdictions to support this approach, including development of a climate action plan (CAP), sustainability plan, or inclusion of a plan for reduction of GHG emissions and climate actions within a jurisdiction's general plan. Any of these can help to align zoning, permitting, and other local tools with climate action.

The Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the Project. Furthermore, the Project would be generally consistent with the City's Green New Deal (see below) which identifies several measures to reduce emissions of GHGs in a manner consistent with the 2022 Scoping Plan. As such, the Project is consistent with Appendix D (Local Actions) of the 2022 Scoping Plan.

Consistency With SCAG RTP/SCS (2020 Connect SoCal Plan)

The State of California has adopted plans and policies designed to reduce regional and local GHG emissions. SB 375 requires that each Metropolitan Planning Organization (MPO) prepare an SCS in the RTP that demonstrates how the region will meet greenhouse gas emissions targets. SB

12 California Air Resources Board, *2022 Scoping Plan Documents*, *Notice of Decision*, 2022. Available online at: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp-appendix-b-notice-of-decision.pdf, accessed March 19, 2024.

375 establishes a collaborative relationship between MPOs and CARB to establish GHG emissions targets for each region in the state. Under the guidance of the goals and objectives adopted by SCAG's Regional Council, the RTP/SCS was developed to provide a blueprint to integrate land use and transportation strategies to help achieve a coordinated and balanced regional transportation system. The RTP/SCS represents the culmination of several years of work involving dozens of public agencies, 191 cities, hundreds of local, county, regional and state officials, the business community, environmental groups, as well as various nonprofit organizations. Adoption of the 2020 RTP/SCS substantiated that the growth forecasts for the SCAG region, taking into account efforts to reduce climate change impacts from GHG emissions, were consistent with the goals of SB 375.

The primary goal of the SCS is to provide a vision for future growth in southern California that will decrease per capita GHG emissions from passenger vehicles. However, the strategies contained in the SCS will produce benefits for the region far beyond simply reducing GHG emissions. The SCS integrates the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and on commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development.

Compared to the uses proposed in the ADSP FEIR, the Project would reduce the amount of vehicle miles traveled to the Project Site. As discussed later in **Section 3.17, Transportation,** the uses proposed by the Project would generate significantly less trips than what was proposed in the ADSP FEIR. Additionally, the Project would be providing affordable housing in a Transit Oriented Community (TOC), as Union Station, a major transit hub for Los Angeles and the region, lies approximately a quarter-mile south of the Project Site. As such, the Project's reduction in vehicle miles traveled would align with the goals of the RTP/SCS and Scoping Plan. The Project's density and close proximity to rail services supports the RTP/SCS vision of decreasing per capita emissions from passenger vehicles. The Project is consistent with the RTP/SCS for the reasons described above and further demonstrated in **Table 3.8-2, Project Consistency with SCAG RTP/SCS,** and **Table 3.8-3**, **Project Consistency with Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions,** below.

Table 3.8-2
Project Consistency with SCAG RTP/SCS

Measure	Project Consistency
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent:** The Project will revitalize an underutilized plot of land and construct an approximately 193,493 sq ft mixed-use affordable housing complex. The Project provides EV charging for passenger vehicles and is in proximity to bus and rail services. These features would incentivize the use of public transit, active transportation, and fuel-efficient vehicles for traveling to and from the site. Additionally, the Project is being developed in a built-out portion of downtown, providing compact
Focus on job/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	
Plan for growth near transit investments and support implementation of first/last mile strategies.	

Measure	Project Consistency
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	development housing in an already largely developed area and would provide employment opportunities with its proposed commercial uses and is in proximity to local job centers**.** The Project's location, its density, and its mobility options are consistent with the actions and strategies of the RTP/SCS.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	
Promote Diverse Housing	
Preserve and rehabilitate affordable housing and prevent displacement.	**Consistent:** The Project entails construction of 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units). This satisfies the region's need for more housing within a TOC and the Project's proximity to bus and rail services promotes the goals of the RTP/SCS as well as the Regional Housing Needs Assessment.
Identify opportunities for new workforce and affordable housing development.	
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedications lanes, charging and parking/drop-off space.	**Consistent.** Per AB 2097, public agencies or cities are prohibited from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop, thus no on-site parking spaces are required. However, the Project Applicant has included on-site parking as part of the Proposed Project for practical operational reasons. Thus, at buildout, the Project would include up to 215 parking spaces, 40 residential parking spaces, and up to 175 commercial parking spaces, of which a total of eight spaces would be handicap accessible. Parking areas would be provided on one at-grade level, one above grade level, and two below-grade levels. Of the 215 parking spaces, 53 are required EV capable spaces (per LAGBC 5.106.5.3.1 & CBC 11B-228.3.2.1), 35 will be EV charging spaces (EVCS) (per LAGBC 4.106.4.2.2), and 18 will be EV capable spaces (per LAGBC 4.106.4.2.2). Additionally, the Project includes an entrance plaza, community gathering spaces, and new landscaping. The open space amenities, as well as the commercial uses proposed with the Project, would serve to reduce trips by residents seeking these amenities at potential off-site locations.
Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments.	
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions.	**Not applicable.** The policies listed are steps that the City can take to support and implement sustainability in their planning and are not relevant to the Project itself.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near	

Measure	Project Consistency
transit corridors and stations.	
Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects.	
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	
Continue to support long range planning efforts by local jurisdictions.	
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as Project implementation that improves community resiliency to climate change and natural hazards.	**Not applicable.** The policies listed are steps that the City can take to support and implement sustainability in their planning and are not relevant to the Project itself.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	
Integrate local food production into the regional landscape.	
Promote more resource efficient development focused on conservation, recycling and reclamation.	
Preserve, enhance and restore regional wildlife connectivity.	
Reduce consumption of resource areas, including agricultural land.	
Identify ways to improve access to public park space.	

Source: Southern California Association of Governments. 2020. *Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy,* available online at: https://www.connectsocal.org/Documents/Draft/dConnectSoCal-03_Draft-Plan.pdf, accessed March 2024.

Table 3.8-3
Project Consistency with Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions

Target	Project Consistency
Chapter 2: Renewable Energy	
LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045	**Not applicable.** The policies listed are steps that the City can take to support and implement sustainability in their planning and are not relevant to the Project itself.
Increase cumulative megawatts (MW) by 2025; 2035; and 2050 of: • Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW • Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW • Demand response programs to 234 MW (2025) and 600 MW (2035)	
Chapter 3: Local Water	
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050	**Consistent.** The Project would be designed to meet the latest in California building codes, including the building energy efficiency standards for residential and nonresidential buildings, California Energy Code, Title 24, Part 6 2022, and CALGreen standards.
Chapter 4: Clean and Healthy Buildings	
Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sqft in 2015).	**Consistent.** The Project would be designed to meet the latest in California building codes, including the building energy efficiency standards for residential and nonresidential buildings, California Energy Code, Title 24, Part 6 2022, and CALGreen standards.
All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.	
Chapter 5: Housing & Development	
Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035	**Consistent.** The Project will develop a mixed-use housing complex that would include 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units) within a TOC located only a quarter of a mile from Union Station and is also served by LA Metro bus routes 76 and 96.
Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035	
Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters	

Chapter 6: Mobility & Public Transit	
Increase the percentage of all trips made by walking, biking, micro-mobility / matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050	**Consistent.** As previously discussed, the Project is located within a quarter of a mile from Union Station and is also served by LA Metro bus routes 76 and 96.
Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050	
Chapter 7: Zero Emission Vehicles	
Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050	**Consistent.** At buildout, the Project would include up to 215 parking spaces. Of the 215 parking spaces, 53 are required EV capable spaces (per LAGBC 5.106.5.3.1 & CBC 11B-228.3.2.1), 35 will be EV charging spaces (per LAGBC 4.106.4.2.2), and 18 would be EV capable spaces (per LAGBC 4.106.4.2.2).
Chapter 9: Waste & Resource Recovery	
Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.	**Consistent.** The Project will comply with AB 939 and the City of Los Angeles' goal of Zero Waste by 2025.
Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028.	
Eliminate organic waste going to landfill by 2028.	
Chapter 10: Food Systems	
Ensure all low-income Angelenos live within ½ mile of fresh food by 2035.	**Consistent.** The Project is located within 0.5 miles of multiple grocery markets that provide fresh produce.
Chapter 11: Urban Ecosystems & Resilience	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.	**Consistent.** The Project will include 16,200 sq ft of residential open space and includes 1,200 sq ft of private balconies, 4,500 sq ft of 'residential gathering' space, 8,000 sq ft of 'residential courtyard' space, and 2,500 sq ft of roof decks.
Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.	

Source: City of Los Angeles, 2019, L.A.'s Green New Deal (Sustainable City pLAn 2019), available online at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf, accessed March 13, 2024.

As demonstrated above, the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and would be consistent with the objectives of SCAG's RTP/SCS, the CARB's 2022 Climate Change Scoping Plan, and the Los Angeles Green New Deal. Therefore, a new significant impact would not occur with Project implementation.

Final EIR Mitigation Measures

There are no ADSP FEIR mitigation measures for greenhouse gas impacts.

Conclusion

The Project would not substantially increase the severity of previously identified impacts in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.9 HAZARDS & HAZARDOUS MATERIALS

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a.) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Yes	No	No	No	No mitigation required	No
b.) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Yes	No	No	No	Yes; see below	No
c.) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Yes	No	No	No	Yes; see below	No
d.) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Yes	No	No	No	Yes; see below	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
e.) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No	No	No	No	No mitigation required	No
f.) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Yes	No	No	No	No mitigation required	No
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No	No	No	No	No mitigation required	No

In 2015, the California Supreme Court, in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. Specially, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for the purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, the analysis associated with hazards and hazardous materials focuses on whether the project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts where applicable.

Impact Determination in the ADSP FEIR

The ADSP FEIR identified potential construction-period impacts related to contaminated groundwater and soils. With mitigation, these impacts would be less than significant. The ADSP FEIR assumed that Phase I development would include excavation up to a depth of approximately 20 feet. The preliminary environmental site assessment completed for the ADSP FEIR identified

soil contamination within the Specific Plan area and known and suspected soil and groundwater contamination on nearby properties. Risks associated with hazards and hazardous materials were determined to be limited to the construction phase of each individual project.

The ADSP FEIR identified several underground storage tanks (USTs) in the Terminal Annex subarea of the Specific Plan, as shown in **Table 3.9-1, Soil and Groundwater Contamination Status, Terminal Annex (1996)**, below. The ADSP FEIR did not identify precise locations for any of the potentially hazardous site conditions.

Table 3.9-1
Soil and Groundwater Contamination Status, Terminal Annex (1996)

Location	Potential Soil and Groundwater Contamination	Status (1996 EIR)
LAFD Fuel Dispenser		No information was available.
25,000 Gallon fuel UST	Soil: No elevated concentrations of Total Recoverable Petroleum Hydrocarbons (TRPH). A TRPH concentration of 20 ppm was detected in one soil sample collected at a depth of approximately 35 feet bgs.	UST was removed in 1992. Closure of the site was approved by LAFD.
Seven USTs and clarifier	Soil: Highest levels of hydrocarbon-contaminated soil were detected at depths ranging from 20-30 feet bgs. Using a cleanup level of 100 ppm Total Recoverable Petroleum Hydrocarbons or TRPH for soil, the in-place volume of impacted soil was estimated to be 21,000 cubic yards. Groundwater: Contaminated with fuel hydrocarbons, with gasoline as the primary constituent. Groundwater contaminated with greater than 10 ppm TPH (gasoline or diesel) extended across a surface area of about 29,000 square feet (or 0.7 acres) as specified in the ADSP FEIR.	Seven USTs and one five-stage clarifier were assessed and removed in 1992. Remediation underway.
Electrical Transformers	No cracks in the transformer casing, no heavy rust, or staining that would suggest cooling oil releases.	PCB-containing transformers may be of future concern if they leak or fail, which may necessitate removal.
Existing clarifier, hydraulic lifts, and car wash	Soil: Unknown Groundwater: Unknown	Investigation underway.
Hazardous Substances		No evidence of concern.

Source: Alameda District ADSP FEIR. 1996
Notes: bgs – below ground surface; TPH – total petroleum hydrocarbons; TRPH – total recoverable petroleum hydrocarbons; ppm – parts per million

According to the Phase I Environmental Site Assessment (ESA) prepared for the proposed Project, in reference to the seven USTs and clarifier identified on the Project Site, the USTs and clarifier were located south/southeast of the Property Site and were removed in 1992, remediation conducted, and closure was issued by the Regional Water Quality Control Board in November of 1999 (Case #900120316). See **Appendix D** for the ESAs prepared for the Project.

Project Changes and Comparison of Environmental Impacts

The Project is consistent with the type of construction anticipated for the site in the ADSP FEIR. The ADSP FEIR anticipated development would require an excavation depth of up to 20 feet. According to the Preliminary Zoning Assessment submittal for the Project, the proposed subterranean parking would require an excavation up to 22 feet. Proposed construction depths could have the potential to expose construction workers to contaminated groundwater. Chemicals required to treat water for use in the cooling system would be handled on-site, however, standard best practices and safety requirements contained in California Code of Regulations, Title 8, Article 109 would ensure the risk is limited. Article 109 regulates hazardous substances and processes, including spill control, storage, devices used to dispense hazardous substances, and containers for hazardous substances.

Phase I and Phase II environmental site assessments (ESAs) were completed for the Project Site in June 2023 (included in **Appendix D** to this Addendum). The Phase I ESA identified conditions indicative of the presence of hazardous substances and petroleum products in, on, or at the Project Site due to the release, likely release, or material threat of a future release into the environment. The Phase I ESA revealed recognized environmental conditions in connection with the Project Site; the ESA recommended additional investigation to assess the potential for onsite releases associated with historical uses and/or to evaluate the potential risk of vapor intrusion to the proposed structures. The Phase II ESA investigated the potential for contaminated soil and soil vapor at the Project Site; testing conducted during the Phase II ESA determined that total petroleum hydrocarbons and volatile organic compounds were not detected in soil, soil vapor, or groundwater concentrations above regulator screening levels. However, copper and/or lead were detected at concentrations exceeding their respective screening levels in shallow soils (1-foot depth) at three locations. Data indicates that the elevated levels of copper and lead are spatially limited both laterally and vertically, an estimate of the volume of soil that will require excavation to achieve acceptable screening levels cannot be provided without additional investigation. The Phase II ESA did not identify widespread environmental impairment to the Project Site; however, isolated areas, not yet discovered, may exist. Therefore, it is recommended that a comprehensive and updated soil management plan (SMP) be developed so that if known or suspected impacted soils are encountered during redevelopment activities, procedures for the handling of these soils and for their appropriate characterization for disposal will be conducted.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The Project Site is not within an airport land use plan; the site is approximately 11 miles from the Los Angeles International Airport and approximately 11.5 miles from the Burbank-Glendale-

Pasadena (Bob Hope) Airport. Therefore, no new significant impacts would occur with Project implementation.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Project Site and surrounding areas are entirely developed and contain no wildland areas. The Project Site is not located adjacent to natural areas that would be subject to wildland fires. Therefore, implementation of the Project would not result in any significant exposure of people or structures to wildland fires. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures J.1.a** through **J.1.c** and **Mitigation Measures J.2.a** through **J.2.c** would be required to reduce hazards and hazardous materials impacts to a less-than significant level. These mitigation measures require proper handling of contaminated groundwater and soil in a manner satisfactory to all public agencies with jurisdiction over such matters, in addition to the requirement that a Remediation Action Plan be developed and implemented for the remediation of contaminated soil and groundwater.

Conclusion

The Project would not substantially increase the severity of previously identified impacts to hazards and hazardous materials in the ADSP FEIR nor exacerbate existing conditions, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.10 HYDROLOGY & WATER QUALITY

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Yes	No	No	No	Yes; see below	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Yes	No	No	No	No mitigation required	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:						
i.) result in a substantial erosion or siltation on- or off-site;	Yes	No	No	No	No mitigation required	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
ii.) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Yes	No	No	No	No mitigation required	No
iii.) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Yes	No	No	No	Yes; see below	No
iv.) impede or redirect flood flows?	Yes	No	No	No	No mitigation required	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No	No	No	No	No mitigation required	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined all Phase I impacts related to hydrology and water quality would be less than significant, or less than significant after mitigation. Impacts related to the increase in water consumption from Buildout Phase would be less than significant. At the time the ADSP FEIR was prepared, approximately 98 percent of the Specific Plan area was either fully or partially

developed. Only two percent of the Specific Plan area was determined to be pervious and undeveloped. Therefore, development under the Specific Plan was determined to negligibly increase the amount of impervious surface, and the impact of Phase I development on the local storm drain system and flood hazards was determined to be less than significant. The Specific Plan area was determined to be outside of the 100-year flood zone, as classified by the relevant FEMA Flood Insurance Rate Map.

Project Changes and Comparison of Environmental Impacts

The current hydrologic condition of the Project Site is consistent with the site that was analyzed in the ADSP FEIR. The Project Site is almost entirely impervious, with minimal pervious areas where ornamental landscaping and trees occur. The drainage pattern of the site would not have changed from the ADSP FEIR since the grade and slope of the site has not changed. As the Project Site is largely entirely impermeable, the development of the Project would result in a negligible addition of impervious surfaces to the Project Site.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes two questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below.

d) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

The County has developed a tsunami inundation zone area map to highlight which areas of the City are at risk for flooding during a tsunami. As shown on these maps, the Project Site is not located in a tsunami inundation area.[13] Additionally, the Project Site is not susceptible to seiche flooding or risks due to its distance from the Pacific Ocean (over 15 miles) and nearest bodies of water, the Elysian and Silver Lake reservoirs (1.3 miles, and 2.8 miles, respectively). Considering the flatness of the Project Site and the similar uses that surround the Project Site, the likelihood of mudflows impacting the Project Site is very minimal. Therefore, no new significant impacts would occur with Project implementation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Los Angeles Regional Water Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters, largely through permitting, such that water quality standards are effectively attained.[14] Accordingly, the Project's water quality impacts would be reduced through compliance with state, regional, and local regulations, such as those established by the federal Clean Water Act or the Urban Water Management Plan established by the LADWP. Additionally, the Project would implement BMPs established by the City's Low Impact Development ordinance in order to target pollutants that could be potentially carried in stormwater runoff. These BMPs minimize runoff in a manner that captures rainwater at its source by utilizing

13 County of Los Angeles, *Tsunami Inundation Zones,* 2016. Available online at: https://geohub.lacity.org/datasets/lacounty::tsunami-inundation-zones/explore?location=34.036122%2C-118.308722%2C11.99, accessed March 13, 2024.

14 California Regional Water Quality Control Board, Los Angeles Region, *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties,* 2014. Available online at: https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html, accessed March 13, 2024.

BMPs such as rain barrels, permeable pavement, storage tanks, and infiltration swales.[15]

Adherence to these regulations would reduce the Project's impacts to the water quality within the area, thereby minimizing its potential impacts to the Coastal Plan for Los Angeles' groundwater basin. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant. Therefore, new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measure I.1.a** through **I.1.c**, **I.2.a,** and **I.2.b** would be required to reduce hydrology and water quality impacts to a less-than-significant level. **Mitigation Measure I.1.a** requires protective measures to keep contaminants out of stormwater runoff and other measures to protect water quality, while **Mitigation Measure I.1.b** requires stormwater discharges from the site meet, at a minimum, all applicable requirements of the State Regional Water Quality Control Board and National Pollutant Discharge Elimination System (NPDES) permit requirements. **Mitigation Measure I.1.c** requires a Stormwater Pollution Prevention Plan (SWPPP) be prepared and submitted for review and approval by the Bureau of Engineering, Storm Water Management Division, prior to issuance of a building permit. **Mitigation Measures I.2.a** and **I.2.b** require a drainage plan be developed, subject to the approval of the City Engineer and City standards, prior to development of any drainage improvements.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to hydrology and water quality in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

15 City of Los Angeles, *Planning and Land Development Handbook for Low Impact Development*, 2016. Available online at: https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf, accessed March 15, 2024.

3.11 LAND USE

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Physically divide an established community?	Yes	No	No	No	No mitigation required	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Yes	No	No	No	Yes	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined Phase I impacts to land use and planning would be less than significant. The Buildout Phase would similarly have no significant impact on applicable land use plans or policies. Although Phase I impacts were less than significant without mitigation, the ADSP FEIR included Mitigation Measure A.1 and A.2 to further minimize Phase I impacts.

Project Changes and Comparison of Environmental Impacts

A detailed description of the Project's proposed height, size, and other quantitative and qualitative details can be found in **Section 2.0, Project Background and Description**. The proposed mixed-use complex would not require a change to its land use or zoning designation.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist is consistent with the questions that were addressed in the ADSP FEIR.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures A.1** and **A.2** would be required. These measures specify the Project's approval is subject to the City's ongoing review of building plans for consistency with the ADP-RIO.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to

land use and planning in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.12 MINERAL RESOURCES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	Yes	No	No	No	No mitigation required	No
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined development under the Specific Plan would not result in the loss of potential aggregate or petroleum resources and found no evidence of previous or active mining on the Project site. The ADSP FEIR determined no impacts to aggregate, or petroleum resources would occur, and no mitigation was required. Beyond aggregate and petroleum resources, the ADSP FEIR did not discuss mineral resources.

Project Changes and Comparison of Environmental Impacts

As discussed in the ADSP FEIR, the Project Site is not located within an area of historic aggregate production or petroleum resources. The proposed Project changes would not alter the absence of mineral resources on the site.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes a question that was not addressed in the ADSP FEIR.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The Conservation Element of the City's General Plan states that the City's primary mineral

resources are: rock, gravel, and sand deposits. Mining of sand and gravel began in Los Angeles around 1900 when concrete became popular as a building material. Extraction began in the Arroyo Seco and the Big Tujunga Wash.[16] The only mineral deposit site in the City is the Tujunga alluvial fan, over 20 miles north of the Project Site. Therefore, there are no significant mineral resources located within the Project Site and implementation of the Project would not impact mineral resources of value to the region or residents of the state or any mineral resource recovery site. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

There are no ADSP FEIR mitigation measures for mineral resource impacts.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to Mineral resources in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

16 City of Los Angeles, *Los Angeles General Plan Conservation Element*, 2001. Available online at: https://planning.lacity.gov/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed March 8, 2024.

3.13 NOISE

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Yes	No	No	No	Yes; see below	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	Yes	No	No	No	No mitigation required	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined Phase I and Buildout Phase construction noise impacts would be less than significant, Phase I operational noise impacts would be less than significant, and Buildout Phase operational noise impacts would be less than significant with mitigation. Phase I

construction would have the potential to cause short-term increases in noise levels in the area, however, due to a lack of noise-sensitive uses in the Specific Plan vicinity and the temporary nature of this impact, it was determined to be less than significant. Although the unmitigated impact was less than significant, mitigation measures were developed to further minimize this impact. Full details on noise measurement can be found in the Specific Plan Draft EIR and appendices.

The ADSP FEIR noise analysis identified traffic noise as the primary source of existing and future noise in the Specific Plan area. The ADSP FEIR anticipated that traffic noise conditions along streets adjacent to the Project Site would increase gradually over time, and found that the net increase in operational noise caused by Phase I and full Buildout compared to the No Project alternative was minimal. Existing operational noise levels in the Project area were generated mainly from traffic, with additional noise generated by trains, industrial facilities, and other sources. According to the ADSP FEIR, all roadway links in the Specific Plan area ranged between approximately 61 and 70 A-weighted decibels (dBA).

A noise increase of more than 3.0 dBA is normally perceived by adjacent receivers as a noticeable difference between and post-Project conditions. All analyzed roadway links fell below the 1.0 dBA threshold of detectability for Buildout Phase development. The ADSP FEIR concluded noise impacts from Buildout Phase development would not be noticeable under ambient conditions and would occur in a minimally sensitive area, and therefore this impact was less than significant.

Project Changes and Comparison of Environmental Impacts

The ADSP permitted mixed uses including office, residential, retail, hotel, theater, stadium, and entertainment uses. In order to ensure flexibility of uses for the Project Site for the future, the ADSP FEIR considered a high impact component of office as constituting the majority of new space. The proposed Project would include the construction of an approximately 193,493 sq ft mixed-use affordable housing complex. Commercial land uses have an average trip generation rate that is higher than the trip generation rate for an affordable housing complex that is located in close proximity to rail services. While a housing complex was not evaluated in the ADSP FEIR, compared to commercial office uses, an affordable housing complex would generate less traffic noise due to the low number of employees and vehicle trips to and from the site.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes two questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below. Additionally, to demonstrate that the Project changes would not result in new or greater noise impacts, a quantitative analysis is provided for all 2024 CEQA Guidelines checklist questions.

a) Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

As previously discussed, the ADSP FEIR anticipated that traffic noise conditions along streets adjacent to the Project Site would increase gradually over time, and found that the net increase in operational noise caused by Phase I and full Buildout compared to the No Project alternative was minimal. The ADSP FEIR anticipated that the Project Site would be developed with commercial office uses which generate more traffic noise and vehicle trips compared to the development of an affordable housing mixed-use complex. Construction of the Project would be

temporary and would cease upon completion and operationally, noise impacts would be less significant and similar to what was analyzed in the ADSP FEIR. Therefore, no new significant impacts would occur with Project implementation.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

The Project proposes to develop a 193,493 sq ft mixed-use affordable housing complex. Construction of the Project could generate groundborne vibration or groundborne noise levels. However, construction would be temporary and localized, ceasing upon completion of construction. Operationally, given the type of use being proposed for the Project Site, the Project would not generate excessive groundborne vibration or groundborne noise levels. The Project is not proposing to develop a use that would generate excessive groundborne vibration or groundborne noise levels. Therefore, no new significant impacts would occur with Project implementation.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The Project Site is not within the vicinity of an airport or within the bounds of an airport land use plan. The site is approximately 11 miles from the Los Angeles International Airport and approximately 11.5 miles from the Burbank-Glendale-Pasadena (Bob Hope) Airport. The Project Site is not within the vicinity of a private use airport or private airstrip. Therefore, no impact would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures G.1.a** through **G.1.d** would be required to reduce noise impacts to a less-than-significant level. **Mitigation Measure G.1.a** requires construction truck routes and staging areas to avoid residential streets and streets adjacent to local schools. **Mitigation Measure G.1.b** requires compliance with all provisions of the City of Los Angeles Noise Ordinance, while **Mitigation Measures G.1.c** and **G.1.d** require noise shielding and mufflers for power construction equipment and noise barriers such as wooden barrier walls surrounding the construction site.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to noise in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.14 POPULATION & HOUSING

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Yes	No	No	No	No mitigation required	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Yes	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR analyzed potential construction- and operational-period impacts to population and housing, concluding all impacts would be less than significant. No mitigation measures were recommended. The impact assessment in the ADSP FEIR anticipated the Project Site would be developed with mixed-use and office uses. The ADSP FEIR anticipated that up to 2,051 net new employees would work in the Specific Plan area under Phase I.

Project Changes and Comparison of Environmental Impacts

The Project would include the construction of an approximately 193,493 sq ft mixed-use affordable housing complex. In addition to the 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units) and 25,473 sq ft of non-residential space being developed, a community care building would be developed totaling approximately 38,828 sq ft. According to the United State Energy Information Administration, a building with a floorspace between 25,001 to 50,000 sq ft would have a median of 1,461 square feet per worker.[17] Thus, the Project can be expected to generate approximately 44 employees for the commercial uses

17 United States Energy Information Administration, *Commercial Buildings Energy Consumption Survey*, 2015. Available online at: https://www.eia.gov/consumption/commercial/data/2012/bc/cfm/b2.php, accessed March 20, 2024.

proposed with the Project. While the Project would include commercial uses, the employment opportunities introduced with the Project would not exceed the anticipated 2,051 net new employees evaluated in the ADSP FEIR.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project would introduce 124 new housing units (100% restricted affordable for Lower Income Households excluding managers' units), providing much needed housing for the City. As the Project Site is currently developed with surface parking, implementation of the Project would not result in residential displacement. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

There are no ADSP FEIR mitigation measures for population and housing impacts.

The Project would not substantially increase the severity of the previously identified impacts to Population and housing in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.15 PUBLIC SERVICES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:						
i.) Fire protection?	Yes	No	No	No	Yes; see below	No
ii.) Police protection?	Yes	No	No	No	Yes; see below	No
iii.) Schools?	Yes	No	No	No	Yes; see below	No
iv.) Parks?	Yes	No	No	No	Yes; see below	No
v.) Other public facilities?	Yes	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined implementation of the Specific Plan would result in significant and unavoidable impacts related to the demand for police services. All other Phase I impacts related to public services were found to be less-than-significant or less-than-significant with mitigation. The ADSP FEIR determined Buildout Phase demand for fire and police services would result in

significant and unavoidable impacts. All other Buildout Phase impacts to public services would be less-than-significant.

Project Changes and Comparison of Environmental Impacts

The Specific Plan and certified ADSP FEIR evaluated the carrying capacity of 1,307,000 sq ft of commercial office development in the Terminal Annex. The Project Site was anticipated for the development of a mix of commercial and government offices, a conference center, and retail uses on the Project Site. Of the 521,045 sq ft of previously analyzed development remaining on the Terminal Annex site, the Project proposes to develop a 193,493 sq ft mixed-use affordable housing complex with community support services and a subterranean parking structure. The Project will pay all necessary impact fees to the appropriate agency for the development of the Project, such as the Los Angeles Unified School District for consistency with Government Code Section 65995 and California Education Code Section 17620. The Project would not result in public services demand beyond what was anticipated in the ADSP FEIR.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures L.1.1.a** through **L.1.1.k, L.2.1, L.3.1**, and **L.4.1** would be required to reduce impacts to public services a less-than-significant level. **Mitigation Measures L.1.1.a** through **L.1.1e** require building and site design to conform to fire access and safety standards. **Mitigation Measures L.1.1.g through L.1.1.k** require new street dimensions to conform to Department of Public Works and Fire Department standards. The design, location, operation, and maintenance of any security gates are subject to the satisfaction of the Fire Department. **Mitigation Measure L.2.1** requires the project design to include specific safety plan design features to facilitate the provision of police services. **Mitigation Measure L.3.1** requires the applicant to pay school mitigation fees as determined by the City. Finally, **Mitigation Measure L.4.1** requires the incorporation of key ADP-RIO design principles regarding open space and passive recreation facilities.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to public services in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.16 RECREATION

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated	Yes	No	No	No	No mitigation required	No
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Yes	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined Phase I and Buildout Phase impacts to park and recreational facilities would be less-than-significant without mitigation, but also included mitigation measures to further minimize any potential impacts. The ADSP FEIR found the daytime worker population generated by Phase I and Buildout Phase office uses would be accommodated by open space and passive recreation areas required on-site for individual projects and within the Specific Plan area overall.

Project Changes and Comparison of Environmental Impacts

While new residences are proposed in the Project, an increase in the use of existing neighborhood parks or other recreational facilities would be unlikely because the Project is proposing 16,200 sq ft of residential open space and includes 1,200 sq ft of private balconies, 4,500 sq ft of 'residential gathering' space, 8,000 sq ft of 'residential courtyard' space, and 2,500 sq ft of roof decks. Although most new residential projects must pay fees to develop parks and recreational facilities to support those residences, the Project is exempt from paying this development fee since the units being developed are all affordable.[18]

18 City of Los Angeles, Department of Parks and Recreation, *Park Fees*. 2023. Available online at: https://www.laparks.org/planning/park-fees, accessed March 25, 2024.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures L.4.1** would be required. These measures require the incorporation of key ADP-RIO design principles regarding open space and passive recreation facilities.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to recreation in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.17 TRANSPORTATION

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Yes	No	No	No	No mitigation required	No
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	No	No	No	No	No mitigation required	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	No	No	No	No mitigation required	No
d) Result in inadequate emergency access?	Yes	No	No	No	No mitigation required	No

Impact Determination in the ADSP FEIR

The ADSP FEIR determined that Phase I and Buildout Phase impacts to traffic delay and congestion would be significant and unavoidable. The ADSP FEIR quantified and evaluated existing conditions, year 2000 conditions with and without the Specific Plan, and year 2010 conditions with and without the Specific Plan. The ADSP FEIR anticipated that Phase I development would result in a total of 19,425 new vehicle trips daily. Buildout Phase development was anticipated to result in a total of 40,210 new vehicle trips daily. Individual projects would cause an incremental increase in trip generation, which when taken together, would result in significant traffic impacts.

Project Changes and Comparison of Environmental Impacts

The Specific Plan and certified ADSP FEIR evaluated the carrying capacity of 1,307,000 sq ft of

commercial office development in the Terminal Annex. The Specific Plan envisioned a fire station at the location of the Project Site; however, the Project Site subarea was anticipated for the development of mixed-use and office uses on the Project Site, including office, residential, retail, hotel, theater, stadium, and entertainment uses. Commercial office has an average trip generation rate that is higher than the trip generation rate for an affordable housing mixed-use development. When comparing the uses approved in the ADSP FEIR to the uses proposed with the Project, the trips being generated by the Project are negligible, since the Buildout Phase anticipated 40,210 daily vehicle trips. As demonstrated previously in **Table 1.1-1**, there is approximately 521,045 sq ft remaining for the Terminal Annex property under Phase I development. Utilizing the Institute of Transportation Engineers (ITE) 9th Edition Trip Generation Guide, 521,045 sq ft of general office use would generate approximately 5,747 daily trips, whereas the Project's proposed 193,493 sq ft affordable housing complex (124 housing units and 64,301 sq ft of non-residential uses) would generate approximately 1,236 trips.[19] See Table **3.17-1,** below for a breakdown of the trip calculation.

Table 3.17-1
Anticipated Project Trips

Project	Square Footage	Daily Trips
ADSP FEIR	521,045	5,747
Proposed Project	193,493 129,192 – Residential 64,301 – Commercial[b]	1,236 527[a,b] 709[c]

[a] *Project proposes 124 housing units (100% restricted affordable for Lower Income Households excluding managers' units). Each use has different trip generation values. See note, below.*
[b] *Per LADOT, multi-family residential uses generate 6.00 trips per dwelling unit, affordable family housing uses generate 4.16 trips per dwelling unit, and general office uses generate 11.03 trips per thousand square feet.*
[c] *Combined West and East Phase non-residential uses.*
Source: LADOT, VMT Calculator Documentation.

The Project is an anticipated and supported use that would not exceed transportation impacts that were previously analyzed in the ADSP FEIR.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below.

b) Would the Project Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Senate Bill 743 (SB 743), effective September 2013, established new criteria for determining the significance of transportation impacts that "promote the reduction of greenhouse gas (GHG)

19 City of Los Angeles, Department of Transportation and Department of City Planning, *City of Los Angeles VMT Calculator Documentation*, 2020.Available online at: https://ladot.lacity.gov/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf, accessed March 18, 2024.

emissions, the development of multimodal transportation networks, and a diversity of land uses." Specifically, SB 743 directed the Governor's Office of Planning and Research (OPR) to update the *CEQA Guidelines* to replace automobile delay—as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion—with vehicle miles traveled (VMT) as the recommended metric for determining the significance of transportation impacts. OPR has approved the *CEQA Guidelines* implementing SB 743.

The State of California Governor's Office of Planning and Research (OPR), in implementing SB 743, issued proposed updates to the CEQA guidelines in November 2017 that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service (LOS) and instead refer to Section 15064.3, subdivision (b)(1), describes factors that might indicate whether a development project's VMT may be significant or not. OPR also developed the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) (December 2018), which provides non-binding recommendations on the implementation of VMT methodology which has significantly informed how VMT analyses are conducted in the State.

At the time that the ADSP was drafted, VMT was not the standard in analyzing impacts to traffic. As previously discussed, Phase I of the ADSP FEIR analyzed 1,307,000 sq ft of construction on the Terminal Annex Site, with all anticipated uses on the site being commercial office space. According to the Development History report, the net remaining square footage to be developed since the adoption of the ADSP is 521,045 sq ft.[20] When comparing the uses approved in the ADSP FEIR to the uses proposed with the Project, the trips being generated by the Project are negligible, since the Buildout Phase anticipated 40,210 daily vehicle trips. As shown in Table 3.17-1, the Project would generate an estimated 1,236 trips as opposed to the 5,747 trips that would be generated if the remaining square footage to developed for Phase I of the ADSP was dedicated to strictly commercial uses. The Project is an anticipated and supported use that would not exceed the vehicle trips anticipated in the ADSP FEIR. Furthermore, the Project would produce less trips than what was projected in the ADSP FEIR.

It is important to note that due to the supportive housing component and the mixed-use nature of the Project, internal capture associated with the commercial and residential uses would further reduce vehicle trips. Furthermore, the Project Site's proximity to transit (a quarter mile from Union Station and adjacent LA Metro bus routes 76 and 96) would further reduce vehicle trips. Due to the Project's reduction in trips to what was previously approved in the ADSP FEIR as well as its proximity to alternative modes of transportation, the Project would not conflict with CEQA Guidelines § 15064.3, subdivision (b). Therefore, no new significant impacts would occur with Project implementation.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project does not include any substantive changes to local streets or intersections. As such, implementation of the Project would not introduce or increase hazards related to design features or incompatible uses. Therefore, no new significant impacts would occur with Project implementation.

20 Craig Lawson & Co., LLC, 2023, *Alameda District Specific Plan Development History.* See **Appendix E.**

Final EIR Mitigation Measures

The Project would not significantly impact intersections or roadway segments identified in the ADSP FEIR. Therefore, no ADSP FEIR mitigation measures are required.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to traffic and transportation in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.18 TRIBAL CULTURAL RESOURCES

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
i.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	No	No	No	No	Yes; see below	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
ii.) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No	No	No	No	Yes; see below	No

An evaluation of Tribal Cultural Resources was not a required CEQA topic at the time the ADSP FEIR was certified.

Project Changes and Comparison of Environmental Impacts

Please refer to **Section 2.0, Project Background and Description**, and **Section 4.5, Cultural Resources**, for a description of the Project Site and the surrounding area. As described in these and other sections in this EIR addendum, the Project Site is located in an urbanized setting and has been disturbed from past developments and improvements to the site.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

As previously discussed, the Project Site and its surroundings are in a highly developed and urbanized area that has been disturbed from past developments and improvements to the site. Should any cultural or tribal resources be encountered during Project implementation, **Mitigation Measure C.1.1.a** through **C.1.1.e** would be required to prevent significant impacts to these resources. With implementation of these mitigation measures, no significant impacts would occur with Project implementation.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The Project Site is developed with surface parking lots and is located within a highly developed and urbanized area; due to the nature of the Project Site, there is a low potential for encountering unrecorded tribal cultural resources. However, there is a possibility of revealing previously undiscovered Tribal Cultural Resources (TCRs). Consistent with the ADSP FEIR, an archeological monitor would be present during any excavation of soils that could contain unrecorded TCRs (i.e., excavation in soil layers beneath the imported fill). Adherence to **Mitigation Measure C.1.1.a** through **C.1.1.e** would be required to prevent damage or destruction of cultural resources. With the implementation of mitigation measures, no significant impacts would occur with Project implementation.

Furthermore, pursuant to Public Resources Code Section 21080.3.1, tribal consultation is only required prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for the Project. As none of these are being pursued, tribal consultation is not required.

Final EIR Mitigation Measures

No ADSP FEIR mitigation measures exist for tribal cultural resource impacts. During construction, **Mitigation Measure C.1.1.a** through **C.1.1.e, Mitigation Measures C.2.1.a** through **C.2.1.i, and Mitigation Measures C.3.1 through C.3.3** would be required to prevent significant impacts to cultural resources. These mitigation measures provide protocols to be followed in the event that archeological and/or paleontological resources are encountered during construction. These measures require an onsite monitor when excavation may disturb sensitive layers of soil, and provide required steps if resources are encountered.

Conclusion

The Project would not substantially increase the severity of previously identified impacts in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.19 UTILITIES & SERVICE SYSTEMS

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
Would the Project:						
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No	No	No	No	Yes; see below	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Yes	No	No	No	Yes; see below	No
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No	No	No	No	Yes; see below	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No	No	No	No	Yes; see below	No
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Yes	No	No	No	Yes; see below	No

Impact Determination in the ADSP FEIR

The ADSP FEIR identified significant and unavoidable impacts related to the disposal of solid waste and hazardous waste. All other impacts related to utilities and service systems were found to be less-than-significant or less-than-significant with mitigation. Significant and unavoidable impacts related to solid waste and hazardous waste disposal were anticipated due to the limited availability of remaining landfill capacity in the City of Los Angeles and Los Angeles County and the limited availability of hazardous waste disposal facilities in the region. Mitigation measures were developed; however, the impact was found to remain significant and unavoidable.

The ADSP FEIR anticipated implementation of Phase I would increase daily water usage by 757,740 gallons per day (gpd). This impact was determined to be less-than-significant, as existing infrastructure was adequate to support this level of demand. Development of the Buildout Phase would increase daily water consumption up to a total of 2,398,176. The ADSP FEIR concluded this impact would be less than significant, as existing and planned infrastructure was adequate to support this level of demand.

The ADSP FEIR also evaluated impacts to energy consumption (electricity and fossil fuels) during construction and increased electrical utility and natural gas utility demand during operation. Energy consumption during construction of Phase I was found to be significant and unavoidable. Electrical consumption during operation, as it relates to the need for expansion of electrical infrastructure, was determined to be less than significant with mitigation. Natural gas consumption was found to be less than significant. Because the Buildout Phase will be driven by market conditions not known at the time the ADSP FEIR was drafted, energy consumption during construction of the total Buildout Phase would be considered to have a significant short-term impact on energy consumption during the construction stage. Electrical consumption during operation, as it relates to the need for expansion of electrical infrastructure, was determined to be

less than significant with mitigation.

Project Changes and Comparison of Environmental Impacts

While the ADSP FEIR anticipated significant and unavoidable impacts as well as less than significant and less than significant impacts with mitigation for utilities, the proposed Project would not require the utility demands assessed in the ADSP FEIR and would result in a less than significant impact to utilities. The ADSP FEIR evaluated the full envelope of commercial uses anticipated for the Phase I and the Buildout phase, revealing high utility demands. However, the Project proposes to develop a 193,493 sq ft mixed-use affordable housing complex whereas over 528,200 sq ft of development remains under Phase I Terminal Annex site as analyzed in the ADSP FEIR. The utilities required for the remaining development capacity in contrast to the utilities required for the proposed housing complex with some commercial uses would be significantly less than what was analyzed in the ADSP FEIR. Comparison of utilities evaluated in the ADSP FEIR and the proposed Project are shown below in **Table 3.19-1, Comparison of Operational Utilities.**

Table 3.19-1
Comparison of Operational Utilities

Utility	ADSP FEIR		Proposed Project
	Phase I	Buildout	
Water Usage (gallons per day)	757,740	2,398,176	30,802[a]
Solid Waste (pounds per day)	21,303	61,730	900
Electricity (kilowatt hours per year)	43,440,000	133,030,000	1,326,535
Natural Gas (cubic feet per year)	81,770,000	301,260,000	0[b]
Sewage (gallons per day)	631,450	1,998,480	30,802[a]

[a] Water and wastewater estimates provided through CalEEMod. CalEEMod does not separate water from wastewater, so the number represented is a conservative combined estimate for both water and wastewater.
[b] Per City requirements, residential component of Project will not use natural gas.
Source: ADSP FEIR, 1995. Impact Sciences, 2024.

As shown in **Table 3.19-1,** the Project would require less utilities than what was evaluated in the ADSP FEIR. However, as described in the ADSP FEIR, all mitigation measures would still be implemented in order to ensure that utility demand would be as mitigated as possible.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below.

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Wastewater

Wastewater generated by the Project would be collected and processed by the City Los Angeles Sanitation (LASAN). LASAN maintains over 6,700 miles of sewer lines and 49 pumping plants in addition to four wastewater reclamation plants across the City for a combined capacity to treat 580 million gallons per day of wastewater.[21] The Los Angeles sewer system is comprised of three systems: the Hyperion Sanitary Sewer System, the Terminal Island Water Reclamation Plant Sanitary Sewer System, and the Regional Sanitary Sewer System. The Project would be served by the Hyperion Treatment Plant located in Playa Del Rey. The existing capacity in the Hyperion Service Area is approximately 550 million gpd with an average daily flow of approximately 275 mgd on a dry weather day.[22] Thus, the Hyperion Treatment Plant has a remaining capacity of 175 mgd.

Operational water and wastewater assumptions were determined through the CalEEMod. Operational water and wastewater consumption would be 30,802 gpd, or 11,242,652 million gallons per year. While CalEEMod does not separate water from wastewater, conservatively assuming the water output from CalEEMod is all wastewater, the Project's anticipated daily wastewater flow would represent approximately 0.01% of the daily capacity at the Hyperion Treatment Plant.

The Project would install new sewer lines that would connect each building on-site to the existing main lines owned by the City. Per Section 64.11.3 (Basis for Sewerage Facilities Charge) and Section 64.16.1 (Sewerage Facilities Charge for Sewer Connection) of the City's Municipal Code, the Project would be subject to payment of service fees and connections fees to the City's Board of Public Works. Utility connections, including sewer system connections, may be included in the Project Applicant's site plan submittal to the City for review and approval. This approval as well as adherence with existing local regulations, would ensure that the Project would result in less than significant impacts to the City's existing wastewater infrastructure and facilities.

Storm Drainage

Stormwater discharges resulting from construction of the Project would consist primarily of non-point source surface runoff from streets, parking areas, sidewalks, patios, rooftops, and planter areas. However, as previously discussed, the Project Site is almost entirely developed with impervious surfaces. Development of the Project would generate similar pollutants as the existing site. The Project would adhere to NPDES requirements and incorporate the appropriate low impact development site design, source control, and treatment control BMPs intended to provide for stormwater retention and infiltration. Implementation of these BMPs would ensure that the City's existing stormwater drainage system would have adequate capacity for the Project stormwater. Thus, new off-site stormwater facilities would not be required, nor are other off-site

21 City of Los Angeles Sanitation, "Clean Water." Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ctp6aqjy1_5&_afrLoop=27256698247363649#!, accessed March 14, 2024.

22 City of Los Angeles Sanitation, "Hyperion Water Reclamation Plant: Treatment Process." Available online at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=19ifpwfl3o_10&_afrLoop=27359482891318008#!, accessed March 15, 2024.

existing facilities anticipated to be expanded.

Dry Utilities

Dry utilities include electricity, natural gas, and telecommunications facilities. The Project would utilize the existing electricity and telecommunication lines and services for the Project Site. Natural gas is not incorporated in the Project's design since all new buildings must be designed to require no natural gas connection. While the Project would result in an increase in dry utilities usage compared to existing conditions, the Project would not exceed the demand for these services as to what was analyzed in the original ADSP FEIR. Additionally, the Project would be subject to payment of connection fees to the existing electricity and telecommunication providers that service the Project Site. Payment of these connection fees would ensure that the Project would not significantly impact the services and facilities of these utility providers.

The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or telecommunications facilities. Therefore, no new significant impacts would occur with Project implementation.

c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Development of the Project would generate additional wastewater beyond existing conditions. As discussed above, LASAN currently has a capacity of treating 580 million gallons per day of wastewater; wastewater generated from the Project would be processed at the Hyperion Treatment Plant located in Playa Del Rey. The existing capacity in the Hyperion Service Area is approximately 550 million gpd with an average daily flow of approximately 275 mgd on a dry weather day.[23] Thus, the Hyperion Treatment Plant has a remaining capacity of 175 mgd. Operational water and wastewater assumptions were determined through the CalEEMod. Operational water and wastewater consumption would be 30,802 gpd, or 11,242,652 million gallons per year. While CalEEMod does not separate water from wastewater, conservatively assuming the water output from CalEEMod is all wastewater, the Project's anticipated daily wastewater flow would represent approximately 0.01% of the daily capacity at the Hyperion Treatment Plant.

Utility connections, including sewer system connections, may be included in the Project Applicant's site plan submittal to the City for review and approval. This approval as well as adherence with existing local regulations, would ensure that the Project would result in less than significant impacts to the City's existing wastewater infrastructure and facilities. Therefore, no new significant impacts would occur with Project implementation.

23 City of Los Angeles Sanitation, "Hyperion Water Reclamation Plant: Treatment Process." Available online at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=19ifpwfl3o_10&_afrLoop=27359482891318008#!, accessed March 15, 2024.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

LASAN collects over one million tons of refuse annually from 750,000 customers.[24] At the time the ADSP FEIR was drafted, most landfills that served the City were experiencing siting, capacity, and operating problems. Presently, the City no longer owns any landfills and the landfills previously owned by the City are all closed or redeveloped; waste is instead disposed of at private landfills. LASAN generally provides solid waste collection services to single-family and some multi-family developments, while private haulers are permitted by the City to provide waste collection services for most multi-family residential, commercial, and institutional developments within the City. Since the City no longer owns any landfills, waste collection is diverted to private haulers who distribute solid waste to nearby County landfills. County landfills are categorized as either Class III or unclassified landfills; non-hazardous municipal solid waste is disposed of at Class III landfills, whereas construction waste, yard trimmings, and earth-like waste is disposed of at unclassified, or inert, landfills. Of the remaining Class III (non-hazardous municipal solid waste) landfill capacity, approximately 71.3 million tons are available to the City (Lancaster, Sunshine Canyon, and Antelope Valley), according to the most recent Integrated Waste Management Plan. Presently, there are ten Class III landfills and one unclassified landfill with solid waste permits are operating in the County.[25] Class III landfills, however, are not able to keep up with the waste disposal needs for the City/County, with a disposal capacity of 137.09 million tons and a demand of 148.14 tons. Seven scenarios to increase capacity at the Class III landfills through the 15-year planning period were evaluated; six out of seven of the scenarios would be able to meet disposal needs in addition to jurisdictions continuing to pursue strategies to maximize waste reduction and recycling, and expand transfer and processing infrastructure.

Construction activities associated with the Project would generate solid waste that would be temporary and would cease upon completion of the Project. Waste generated from Project construction would comply with all regulations regarding solid waste disposal contained in Article 1 of Chapter XIX the City's municipal code as well as the construction and demolition waste recycling ordinance, which requires that all mixed construction and demolition waste generated within city limits must be taken to City certified waste processors.[26] According to the Project's Air Quality and Greenhouse Gas modeling as presented above, Project operational activities are expected to generate approximately 164.4 tons per year of solid waste, or 0.45 tons per day. The solid waste generated from Project operations would represent less than 0.002% of the maximum daily throughput of all Class III landfills available to the City, as shown in **Table 3.19-2, Class III Landfill Capacity,** below.

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24 City of Los Angeles Sanitation, "Collection." Available online at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-c?_adf.ctrl-state=b54n6bp8q_1&_afrLoop=27730378559970030&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D27730378559970030%26_afrWindowMode%3D0%26_adf.ctrl-state%3Db54n6bp8q_5, accessed March 14, 2024.

25 County of Los Angeles, Department of Public Works, *Los Angeles County Integrated Waste Management Plan 2021 Annual Report*, December 2022. Available online at: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&hp=yes&type=PDF, accessed March 15, 2024.

26 City of Los Angeles Sanitation, "Construction & Demolition Recycling." Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=27633585204584239&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=2gj05tsl9_74#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D27633585204584239%26_afrWindowMode%3D0%26_adf.ctrl-state%3D2gj05tsl9_78, accessed March 18, 2024.

Table 3.19-2
Class III Landfill Capacity

Landfill Facility	2021 Average Daily Disposal (tons/day)	Maximum Daily Disposal (tons/day)	Remaining Daily Capacity (tons/day)	Remaining Landfill Life (years)
Antelope Valley	2,645	5,548	2,903	8
Lancaster	397	5,100	4,703	20
Sunshine Canyon	7,830	12,100	4,270	16
Total	10,872	22,748	11,876	71.3

Source: County of Los Angeles Department of Public Works: Los Angeles County Integrated Waste Management Plan; Impact Sciences, 2024.

As such, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

Implementation of **Mitigation Measures M.1.1.a** through **M.1.1.g**, **M.2.1**, **M.2.2.a** through **M.2.2.g**, **M.2.3.a**, **M.2.3.b**, **M.3.1.a** through **M.3.1.c**, **M.3.2.a** through **M.3.2.d**, **M.4.2.a**, **M.4.2.b**, **I.2.a**, and **I.2.b** would be required to reduce impacts to utilities and service systems to a less-than significant level. **Mitigation Measures M.1.1a** through **M.1.1.g** require the use of water conservation measures where feasible. **Mitigation Measures M.2.1**, **M.2.2.a** through **M.2.2.g**, **M.2.3.a**, and **M.2.3.b** require the diversion of waste from landfills wherever possible, compliance with local and state waste reduction measures, and the reduction of common hazardous materials where feasible. **Mitigation Measures M.3.1.a** through **M.3.1.c** and **M.3.2.a** through **M.3.2.d** require water-conserving measures to reduce sewer flows and compliance with the City of Los Angeles' Sewer Allocation Ordinance. **Mitigation Measures M.4.2.a**, **M.4.2.b**, **I.2.a**, and **I.2.b** require compliance with the State Energy Conservation Standards and reduction of energy consumption during the construction period.

Conclusion

The Project would not substantially increase the severity of the previously identified impacts to utilities and service systems in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. No additional mitigation beyond what is considered in the ADSP FEIR would be required. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

3.20 WILDFIRE

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:						
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No	No	No	No mitigation required	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No	No	No	No	No mitigation required	No
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No	No	No	No	No mitigation required	No

CEQA Guidelines Environmental Checklist	Discussed in EIR?	New Significant Impacts Not Previously Identified?	New Circumstances Involving New or Greater Significant Impacts?	New Information Involving New or Greater Significant Impacts?	Final EIR Mitigation Measures Required?	New Mitigation Measures Required?
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No	No	No	No	No mitigation required	No

An evaluation of Wildfire was not a required CEQA topic at the time the ADSP FEIR was certified.

New CEQA Significance Thresholds

The 2024 CEQA Guidelines environmental checklist includes questions that were not addressed in the ADSP FEIR. Analysis of these questions is provided below.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project Site is not located within a locally identified wildfire hazard zone, nor is the Project Site located within a State Responsibility Area.[27] The Project Site is located within a developed area of the City and does not present a wildfire hazard. Additionally, the Project Site is not adjacent to any evacuation routes identified by the City. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no impacts would occur. Therefore, no new significant impacts would occur with Project implementation.

b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

As stated above, the Project Site is not located in or near state responsibility areas or lands classified as a local fire hazard zone. The Project would be located in a developed and urban environment that would not exacerbate wildfire risks or expose the public to uncontrolled spread, and no impacts would occur. Therefore, no new significant impacts would occur with Project implementation.

27 CAL FIRE, "Fire Hazard Severity Zones," Available online at: https://www.arcgis.com/apps/mapviewer/index.html?layers=81eced82ffac42ffbef12a3e95e7769f, accessed March 14, 2024.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Project will not require the installation or maintenance of infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities. Therefore, the Project would not exacerbate fire risk, and there would be no impact. Therefore, no new significant impacts would occur with Project implementation.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As stated above, the Project would not be located in or near state responsibility areas or lands classified as a local fire hazard zone. Additionally, the Project Site is located on relatively flat terrain, and would not be subject to landslides. Thus, wildfire impacts involving downslope, downstream flooding, or landslides would not occur, and there would be no impact. Therefore, no new significant impacts would occur with Project implementation.

Final EIR Mitigation Measures

There are no ADSP FEIR mitigation measures for wildfire impacts.

Conclusion

The Project would not substantially increase the severity of impacts from wildfires in the ADSP FEIR, and no new significant impacts would occur with implementation of the Project. Based on the foregoing, the City of Los Angeles has determined that:

A) Substantial changes in the Project resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

B) Substantial changes with respect to the circumstances under which the Project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects would not occur.

C) New information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects has not been identified.

4.0 CONCLUSION

As demonstrated by the discussion above, none of the conditions described in PRC Section 21166 and *State CEQA Guidelines* Sections 15162 and 15163 requiring a Subsequent or Supplemental EIR would occur.

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