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February 7, 2023

Agenda No. 4
03/15/22
**ADOPTED**
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES
24 February 7, 2023
CELIA ZAVALA
EXECUTIVE OFFICER

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

**Re: Title 22 – Florence-Firestone TOD Specific Plan**

Dear Supervisors:

Your Board previously conducted a duly-noticed public hearing regarding the above-referenced project to approved a General Plan amendment to authorize the proposed Florence-Firestone Transit Oriented District ("FFTOD") Specific Plan, for the unincorporated community of Florence-Firestone, which incorporates changes to land use, zoning and development standards centered around the Slauson, Florence, and Firestone rail stations and updates the Florence-Firestone Community Plan, redesignates land use and zoning categories in Florence-Firestone to facilitate more affordable housing opportunities, economic development, pedestrian and other multi-modal access around transit stations and within the community, addresses industrial/residential incompatibility, and implements the Housing Element. As a part of this project, the Florence-Firestone Community Standards District in Los Angeles County Code, Chapter 22.324, will be repealed and replaced with Chapter 22.418, the Florence-Firestone Transit-Oriented District Specific Plan Zones and Development Standards, which comprises development standards to encourage active transportation and community-serving uses.

At the conclusion of the public hearing your Board indicated an intent to approve the project. Enclosed are the resolution and the associated maps, the

Transit Oriented District Specific Plan, final analysis and ordinance, and zone change ordinance for your consideration.

Very truly yours,

DAWYN R. HARRISON
Interim County Counsel

By Lisa Jacobs
LISA C. JACOBS
Deputy County Counsel
Property Division

APPROVED AND RELEASED:

THOMAS J. FAUGHNAN
Senior Assistant County Counsel

LCJ:bh
Enclosures

c: Fesia A. Davenport, Chief Executive Officer
Celia Zavala, Executive Officer, Board of Supervisors
Amy J. Bodek, Director, Department of Regional Planning

**A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES RELATING TO PROJECT NO. 2020-003127-(2) ADVANCE PLANNING CASE NO. RPPL2020-009556-(2) GENERAL PLAN AMENDMENT NO. RPPL2021-002373-(2) ENVIRONMENTAL ASSESSMENT NO. RPPL2020-009523(2)**

**WHEREAS**, Article 6 of Chapter 3 of Division 1 of Title 7 of the California Government Code ("Government Code") (commencing with section 65350) provides for the adoption of, and amendment to, a county's general plan and elements thereof;

**WHEREAS,** the Los Angeles County ("County") Board of Supervisors ("Board") adopted the County General Plan ("General Plan"), pursuant to Government Code section 65300 on October 6, 2015;

**WHEREAS**, Government Code section 65358 allows for the amendment of all or part of an adopted general plan and specifies that each amendment may include more than one change to the general plan;

**WHEREAS**, pursuant to Chapter 22.198 of the Los Angeles County Code ("County Code"), the County authorizes the County to adopt zone changes;

**WHEREAS**, Article 1 of Chapter 4 of Division 1 of Title 7 of the California Government Code (commencing with section 65800) and Chapter 22.244 of the County Code, authorizes the County to adopt amendments to Title 22 of the County Code; and

**WHEREAS**, the Board conducted a duly-noticed public hearing on March 15, 2022, in the matter of Project No. 2020-003127-(2), consisting of Advance Planning Project No. RPPL2020-009556-(2), General Plan Amendment No. RPPL2021-002373-(2), and the Final Environmental Impact Report ("FEIR") associated with Environmental Assessment No. RPPL2020-09523-(2) (collectively, the "Project"), to authorize the proposed Florence-Firestone Transit Oriented District ("FFTOD") Specific Plan for the unincorporated community of Florence-Firestone, which incorporates changes to land use, zoning and development standards centered around the Slauson, Florence, and Firestone rail stations to add the FFTOD Specific Plan to the General Plan and updates the Florence-Firestone Community Plan, redesignate land use and zoning categories in Florence-Firestone to facilitate more affordable housing opportunities, economic development, pedestrian and other multi-modal access around transit stations and within the community, addresses industrial/residential incompatibility and implements the Housing Element. As a part of the Project, the existing Florence-Firestone Community Standards District ("CSD") in County Code, Chapter 22.324, will be repealed and replaced with Chapter 22.418, the Florence-Firestone Transit-Oriented District Specific Plan Zones and Development Standards (Chapter 4 of the FFTOD Specific Plan), which comprises development standards to encourage active transportation and community-serving uses, as well as development standards for scale

and massing, building orientation, building architectural elements, circulation, parking, exterior lighting, and private and publicly accessible open space.

**WHEREAS**, the Board considered all materials related to this Project, file information, the FEIR, and public comments;

**WHEREAS**, the Board finds as follows:

1. The proposed Specific Plan area covers the unincorporated area of Florence-Firestone. This community is one of the most densely populated communities in unincorporated Los Angeles County, with an area of 3.6 square miles and an estimated population of 61,983 (2020 Census). It is surrounded by the City of Los Angeles to the north, south, and west, and shares a boundary with the City of Huntington Park and the City of South Gate, and the unincorporated community of Walnut Park. The community includes three Metro A (formerly Blue) Line light rail stations known as Slauson Station, Florence Station, and Firestone Station;

2. The Project was initiated in 2019 to facilitate more opportunities for affordable housing, transit-oriented development, active transportation, and access to transit in Florence-Firestone, and is partially funded by grants from the State Department of Transportation and the State Department of Housing and Community Development;

3. The Project is informed by a number of background reports on existing conditions and needs assessments on transportation, demographics, land use, characteristics and socioeconomic conditions from an equity lens. The studies identified areas of opportunity, typical commercial activities, and market trends;

4. The proposed FFTOD Specific Plan is an implementation tool of the General Plan, and consistent with, and supportive of, the goals and policies of the General Plan. The Specific Plan supports policies within the Land Use, Mobility, Air Quality, Noise, Public Services/Facilities, and Economic Development Elements. The Specific Plan is also consistent with, and supportive of, the goals and policies of the Florence-Firestone Community Plan. However, the Project will update themes, policies, and goals in the Community Plan, and includes edits for consistency;

5. The Project will make changes to the General Plan Land Use Policy Map for Florence-Firestone to support more opportunities for affordable housing, encourage transit-oriented development and promote active transportation, improve access to transit, reduce vehicle miles traveled ("VMT") by cars, streamline the review of future development projects, and meet the Regional Housing Needs Assessment ("RHNA") needs from the Housing Element;

6. The Project proposes to expand the number of properties designated as Mixed-Use in existing commercial corridors and industrial areas, particularly around the Slauson Station. The Project also increases residential densities,

particularly around the Slauson Station and the Florence Station. Intensification of density was focused particularly around the Slauson Station area in consideration of the soon-to-be-constructed West Santa Ana Branch Metro Line that will connect Downtown Los Angeles through southeast of the County at the Slauson Station. As the southern part of the community is more vulnerable to displacement, only minor land use changes are proposed in areas near the Firestone Station to help facilitate the development of missing middle housing types, such as duplexes and triplexes;

7. The FFTOD Specific Plan will map nine new zones to implement the Transit Oriented District ("TOD") concepts identified in the FFTOD Specific Plan, support increased density consistent with land use changes, and address displacement risk. The nine new zones are MU-1 (Mixed-Use 1), MU-2 (Mixed-Use 2), MU-3 (Mixed-Use 3), MU-T (Mixed-Use Transit), RLM-1 (Residential-Low-Medium 1), RLM-2 (Residential-Low-Medium 2), RM (Residential Medium), and RSS (Residential Slauson Station). The residential zones and mixed-use zones include development standards, such as open space, setbacks, and height restrictions to address community concerns with bulk and design. The rezoning, in part, implements the Housing Element by creating site capacity to meet the County's RHNA goals;

8. Informed by Figure 5-27 of the General Plan, which identifies "Industrial Flex Districts" in Florence-Firestone, the FFTOD Specific Plan maps a new Industrial Mix ("IX") zone to provide more flexibility for uses the industrial area along the Slauson corridor. The FFTOD Specific Plan also rezones properties along Wilmington Avenue around the Slauson Station and Florence Station and in the southeast portion of the community, from M-1 and M-2 to IX, to address land use compatibility issues where residences are adjacent to industrial uses;

9. The Project rescinds and replaces the Florence-Firestone CSD with Chapter 4 of the Specific Plan (Florence-Firestone Zones and Development Standards). The regulations contained within Chapter 4 establish the nine new zones and include standards for the following sections: Community-Wide Development Standards, TOD Mixed-Use Zones, TOD Residential Zones, TOD Industrial Mix Zones, Circulation and Parking Standards, and Countywide Zones. It also includes standards to support community-serving commercial uses, and establishes a frontage zone on private property in select areas to increase the width of sidewalks. Together, they work to encourage active transportation, support outdoor dining, and create a welcoming pedestrian environment. Furthermore, the regulations also address scale and massing, building orientation, building architectural elements, circulation, parking, exterior lighting, and private and publicly accessible open space;

10. In August 2020, the Regional Planning staff ("Staff") held a multi-jurisdictional coordination meeting with the cities of Huntington Park, Los Angeles, and Vernon and with Metro to provide a project overview and discuss how best to coordinate planning efforts. In October 2020, Staff conducted an online town hall meeting to

introduce the Project, and in November 2020, conducted a series of focus group meetings and community partner conversations. In December 2020, Staff held an online community mapping activity. Finally, in February 2021, Staff held a community orientation webinar and a follow-up partner jurisdiction coordination meeting;

11. To supplement online engagement, hard copies of a TOD Planning Guide with accompanying community feedback worksheets were distributed to the community with the help of County libraries and community partners during February 2021. In all, Staff received over 150 worksheet responses from community members. Outreach also included online briefings and surveys to youths in the community, who were able to share feedback as well. In addition, a public scoping meeting for the Environmental Impact Report ("EIR") was held on March 25, 2021, to provide project information and solicit public comments;

12. A Programmatic EIR was prepared in compliance with the California Environmental Quality Act ("CEQA") and the County environmental guidelines. The draft Specific Plan and Draft EIR were publicly released on September 21, 2021. In conjunction with the release of the draft documents, newsletters and notices were emailed to community stakeholders to share information about the Project, and a newspaper notice was filed;

13. The Program EIR identified that the Project would result in less than significant impacts to the following areas: Aesthetics, Energy, Geology and Soils, Land Use and Planning, Population and Housing, Public Services, Recreation, and Transportation. The following were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through the implementation of mitigation measures: Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Tribal Cultural Resources, and Utilities and Service Systems. However, impacts to Air Quality and Cultural Resources were determined to be significant and unavoidable, requiring a Statement of Overriding Considerations;

14. The Project has environmental, economic, and social benefits that outweigh the unavoidable adverse environmental impacts of the short-term impacts on air quality and impacts to cultural resources due to the potential to encounter previously unrecorded or unknown resources during construction of improvements required by the Specific Plan, for by-right development, or activities that are subject to ministerial review or statutorily exempt from CEQA. Implementation of the Project supports attainment of State, regional, and County goals for greenhouse gas reduction, reduction of VMT, encouraging housing and economic development opportunities, and addressing industrial and residential incompatibility;

15. Pursuant to the provisions of County Code Section 22.222.180, a public hearing notice was published in local and regional newspapers, La Opinion and Press-Telegram, on December 7, 2021. The public hearing notice and materials

were posted on the Department of Regional Planning's ("Regional Planning") website on December 15, 2021, sent via email, and promoted through social media;

16. On January 19, 2022, the County Regional Planning Commission ("Commission") conducted a duly-noticed public hearing (virtually via Zoom). After hearing public comments, the Commission closed the public hearing and voted unanimously to recommend to the Board certification of the Final EIR and approval of the Project with changes recommended by Staff.

17. On March 15, 2022, the Board held a duly-noticed public hearing. Regional Planning submitted a written statement for the record. Two members of the public addressed the Board. Correspondence was received. After discussion, a motion by Supervisor Mitchell and seconded by Supervisor Hahn, the Board closed the public hearing and took the following actions:

    A. Certified that the FEIR and its associated Findings of Fact and Statement of Overriding Considerations associated with Environmental Assessment No. RPPL2020-009523-(2), have been completed in compliance with the CEQA and reflects the independent judgment and analysis of the County; found that the Board has reviewed and considered the information contained in the FEIR prior to approving the Project, adopted the mitigation monitoring program, finding that the mitigation monitoring program is adequately designed to ensure compliance with the mitigation measures during implementation; and determined that the significant adverse effects have either been reduced to an acceptable level or are outweighed by the specific overriding considerations of the Project, as outlined in the Findings of Fact and Statement of Overriding Considerations, which findings and statement are adopted and incorporated by reference, and approved the FEIR;

    B. Indicated its intent to approve Project No. 2020-003127-(2), Advance Planning Project No. RPPL2020-009556-(2), and General Plan Amendment No. RPPL2021-002373-(2) as recommended by the Commission.

    C. Made a finding that the Project is consistent with the goals, policies, and principles of the General Plan; is in the interest of public health, safety and general welfare and in conformity with good zoning practice, and consistent with other provisions of Title 22 of the County Code; and

    D. Instructed County Counsel to prepare the final documents for the Project for the Board's consideration.

18. Geographic Information Systems ("GIS") technology allows for the preparation of digitized maps and parcel-sized maps. As a result, the Project digitizes and portrays its land use policy maps on a parcel-sized basis. These changes are

not substantive. The FFTOD Specific Plan includes not only static maps, but GIS data that generates maps and figures in multiple, dynamic ways.

**THEREFORE, THE BOARD OF SUPERVISORS:**

1. Certifies that the FEIR and its associated Findings of Fact and Statement of Overriding Considerations and Environmental Plan No. RPPL2020-009523-(2) have been completed in compliance with CEQA and the State and County CEQA Guidelines related thereto and reflects the independent judgment and analysis of the County;

2. Has reviewed and considered the information contained in the FEIR prior to approving the Project;

3. Adopts the mitigation monitoring and reporting program, finding that the mitigation monitoring program is adequately designed to ensure compliance with the mitigation measures during Project implementation;

4. Determines that the significant adverse effects of the Project have either been reduced to an acceptable level or are outweighed by the specific overriding considerations of the Project, as outlined in the CEQA Findings of Fact and Statement of Overriding Considerations;

5, Adopts General Plan Amendment No. RPPL2021-002373-(2) amending the General Plan to add the FFTOD Specific Plan to the General Plan, update the Florence-Firestone Community Plan, and redesignate land use and zoning categories in Florence-Firestone to facilitate more affordable housing opportunities, economic development, pedestrian and other multi-modal access around transit stations and with the community; address industrial/residential incompatibility and implement the Housing Element, and determine that the Project is compatible with, and supports, the goals and policies of the County General Plan;

6. Adopts Advanced Planning Project No. RPPL2020-009556-(2), amending County Code, Title 22 – Planning and Zoning, to rescind the Florence-Firestone CSD and replace it with Chapter 4 – Title 22, Chapter 22.418 Florence-Firestone Zones and Development Standards of the Specific Plan, which is comprised of development standards to encourage active transportation and community-serving uses.

The foregoing resolution was executed on the ___ day of _____, 2023, adopted by the Board of Supervisors of the County of Los Angeles and ex officio the governing body of all other special assessment and taxing districts, agencies, and authorities for which said Board also acts.

CELIA ZAVALA
Executive Officer
Board of Supervisors
County of Los Angeles

By _____
Deputy

APPROVED AS TO FORM:

DAWYN R. HARRISON
Interim County Counsel

By_____
STARR COLEMAN
Assistant County Counsel

Attachments:

Exhibit A: Florence-Firestone Transit Oriented District Specific Plan
Exhibit B: Land Use Policy Change Maps
Exhibit C: Florence-Firestone Specific Plan Boundary Map
Exhibit D: Updates to the Florence-Firestone Community Plan
Exhibit E: Final Programmatic Environmental Impact Report (with Mitigation Monitoring and Reporting Program)
Exhibit F: Findings of Fact and Statement of Overriding Considerations

# EXHIBIT A



Artist Credit: "Short Stories" Mural by Willie Middlebrook

# Florence-Firestone TOD Specific Plan

**County of Los Angeles Department of Regional Planning**

Final
January 2022

# Slauson Station TOC Specific Plan, aka
# Florence-Firestone TOD Specific Plan

Prepared for:

County of Los Angeles, Department of Regional Planning
320 West Temple Street
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# Chapter 1

Art Credit: "Short Stories" Mural by Willie Middlebrook

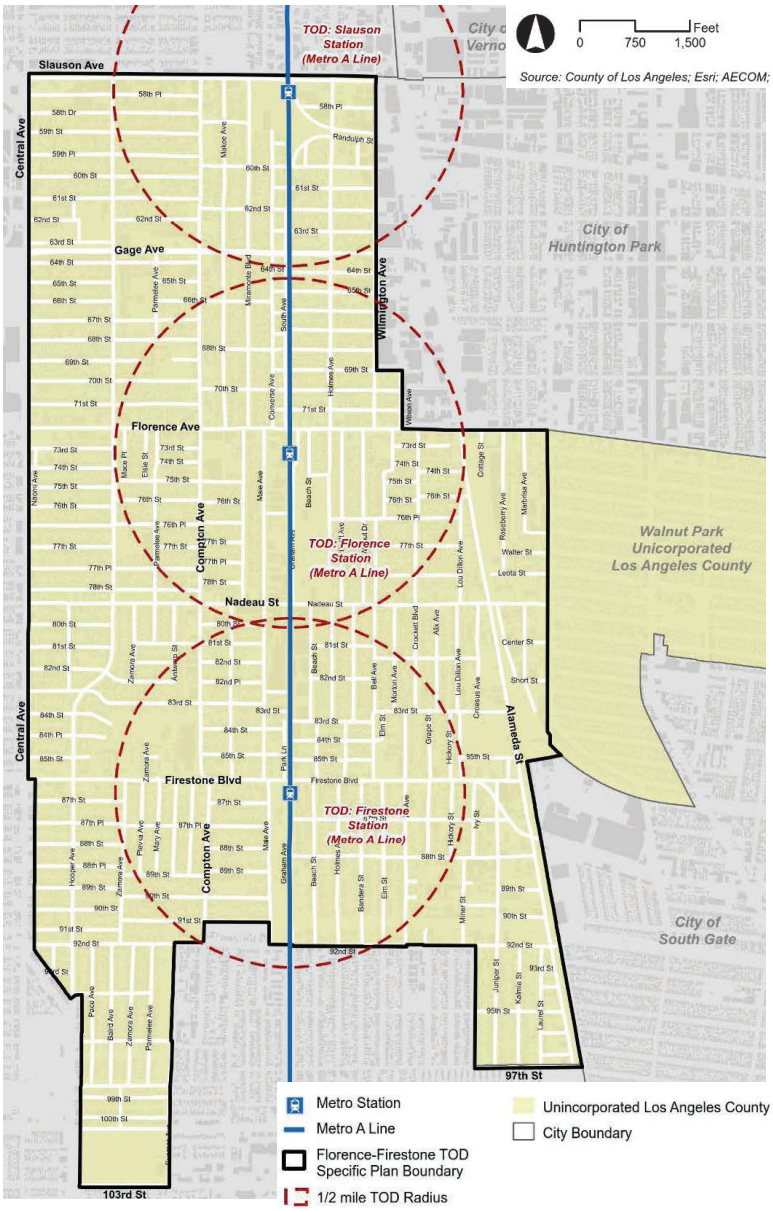
## Introduction

# 1 Introduction

## 1.1 Overview

The Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) establishes transit-oriented development policy direction, design standards, and implementation programs for the community of Florence-Firestone. The intent of this Specific Plan is to increase living and working opportunities near the three Metro transit stations within the community and provide safer ways of moving around the community by walking, bicycling, rolling, and/or using transit.

### Figure 1-1: FFTOD Specific Plan Area & TODs




The FFTOD Specific Plan implements the General Plan TOD Program, which established TODs in the unincorporated County as a ½ mile radius around Metro rail stations. These TOD areas indicate where the County wants to encourage new housing, employment, community services, and active transportation opportunities. See Figure 1-1 for the Specific Plan Area and established TODs.

The Specific Plan mirrors and builds upon the policies of the General Plan and the Florence-Firestone Community Plan (FFCP). The Specific Plan seeks to stimulate economic development, support greater access to transit and services through walking and rolling trips, and increase housing and employment opportunities in a contextually sensitive manner within walking distance to transit stations. The Specific Plan also takes advantage of the upcoming West Santa Ana Branch light rail extension under development by Metro. This Specific Plan project has the potential to improve transit connection between Florence-Firestone and the rest of southeast Los Angeles County and increase economic opportunities.

Projects that are consistent with the Specific Plan policies and development standards will in turn be consistent with the General Plan and FFCP policies.

The Specific Plan also implements the 2019 Florence-Firestone Community Plan (FFCP) by creating actions to achieve the FFCP policies and implement the broader TOD goals of the County.

Throughout this document, sidebars are provided with text that describes how the Specific Plan will implement the policies of the FFCP, is related to community feedback, or supports other County planning efforts.

Specific Plan Organization

The Specific Plan includes the following chapters:

- **Chapter 1 – Introduction.** Defines the Specific Plan context, relationship to other relevant plans and programs, and a summary of the public outreach that informed the planning process.
- **Chapter 2 – Purpose & Guiding Principles.** Describes the purpose and concepts of the Specific Plan, including guiding principles that build from the community vision statement of the 2019 FFCP.
- **Chapter 3 – Land Use & Urban Design Framework.** Introduces the framework, concept, and objectives used to inform the zones and development standards for each station TOD area and Florence-Firestone as a whole.
- **Chapter 4 – Title 22 Chapter 22.418 Florence-Firestone Zones & Development Standards.** While broad land use categories are assigned in the General Plan and FFCP, the Specific Plan establishes new zones to implement the TOD concepts, establishes a detailed list of allowed land uses and permit requirements for each zoning district and objective development standards such as density, intensity, building height, and setbacks. Standards include pedestrian design, building design, open space and landscaping, and parking.
- **Chapter 5 – Mobility.** Provides a discussion of the community mobility network and identifies multi-modal improvements to support walking, biking, rolling, and transit use.
- **Chapter 6 – Infrastructure.** Addresses the infrastructure requirements associated with future development in the Specific Plan Area.
- **Chapter 7 – Implementation.** Provides financing strategies, and actions to implement the vision and guiding principles of the Specific Plan.

## 1.2 How to Use the Specific Plan

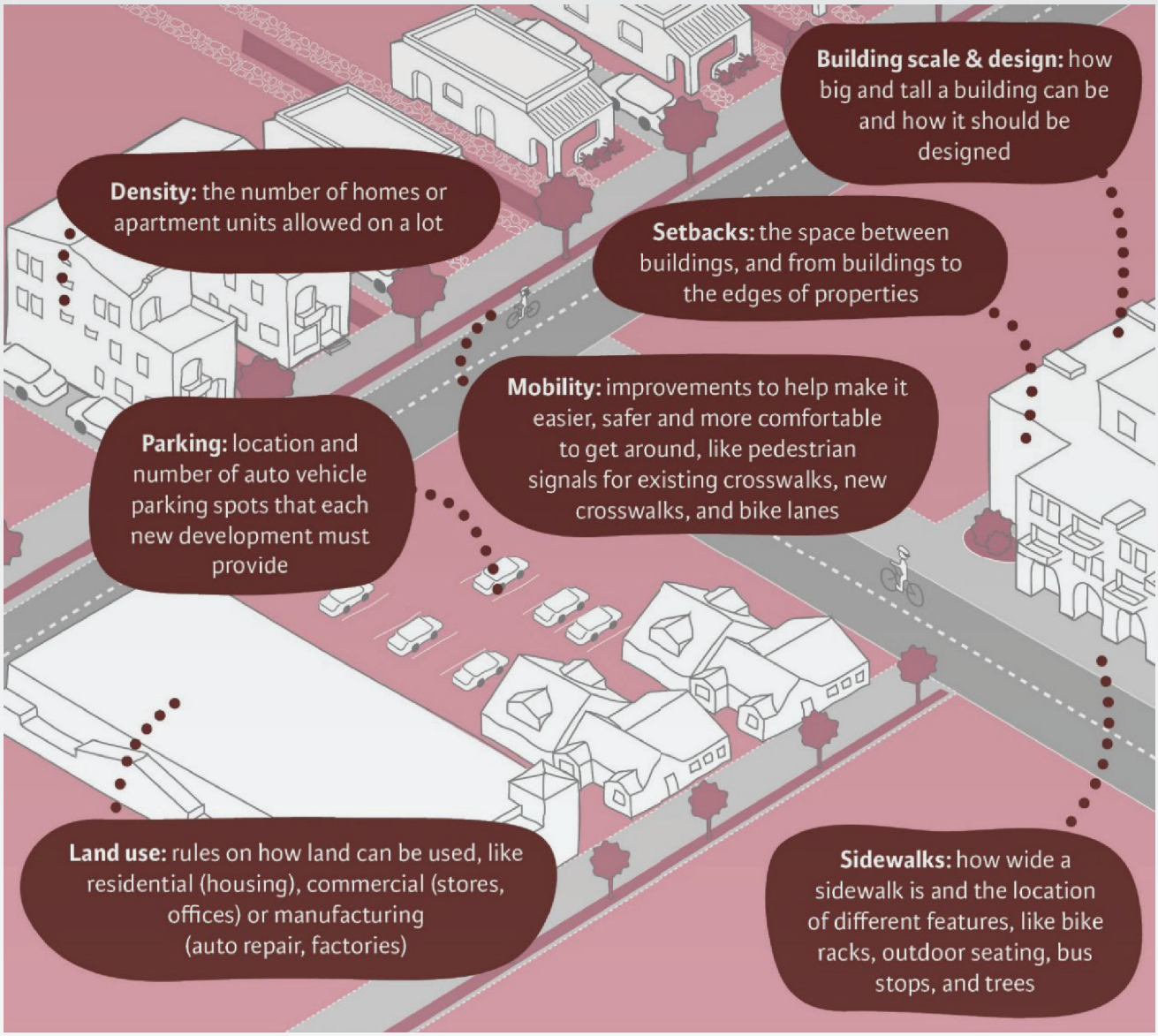
Under State law, cities and counties may adopt specific plans to implement the general plan. The specific plan, therefore, serves as a bridge between the general plan and individual development projects, guiding the way future projects in a community will contribute to the overall community.

Specific plans are similar to development-oriented zoning ordinances. However, unlike the County Code, the FFTOD Specific Plan is targeted to the unincorporated area community of Florence-Firestone to allow for greater flexibility and focus in addressing local community interests.

This Specific Plan is intended to be used by the Florence-Firestone community residents, business and property owners, developers, designers, County staff, and decision-makers in the review of proposed development projects in Florence-Firestone as well as initiation of other projects that will truly help Florence-Firestone become a transit-oriented community. The standards established by this Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the General Plan and FFCP, and support transit-oriented development investments within the community.

## Figure 1-2: What is a Specific Plan?

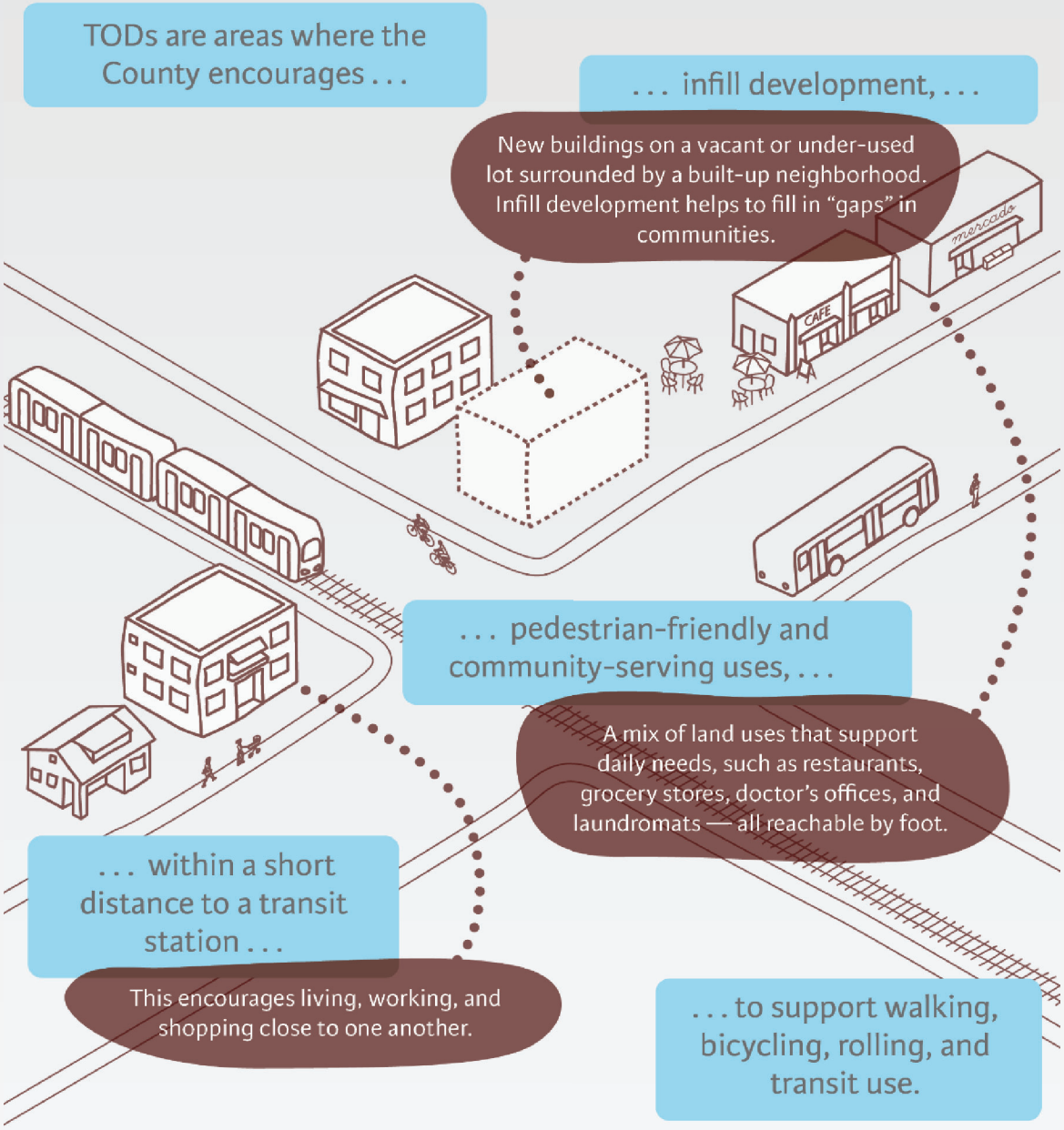
In the State of California, a Specific Plan is one of many tools for implementing the goals and policies of a General Plan. Specific plans implement a city or county's General Plan through the development of policies, programs, and regulations for a localized area. Specific plans are put in place to regulate areas with distinct character or objectives that cannot be regulated through general ordinance or city-wide zoning. A Specific Plan establishes a link between implementing policies of the General Plan and the individual development proposals in a defined area within the city. The illustration below includes the type of elements addressed by this Specific Plan.



## Figure 1-3: What is a Transit Oriented District (TOD)?

A TOD is a ½-mile radius around transit, such as a bus stop or train station, with planning and street improvements, intended to make it easier to live, work, shop, and play in the neighborhood. Three TODs in the Florence-Firestone community were identified by the General Plan: The Slauson Station TOD, the Florence Station TOD, and the Firestone Station TOD.

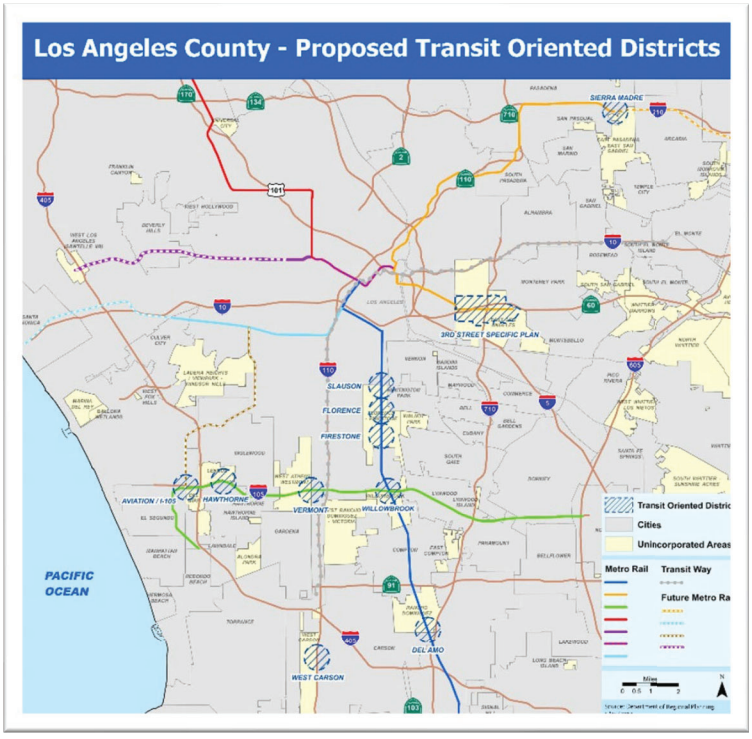
These areas were established to promote transit- and pedestrian-friendly development and community-serving uses near transit stations, increase transit use, manage congestion, and improve air quality.



### 1.2.1 Relationship to Other Planning Documents

This Specific Plan was developed in compliance with requirements of California Government Code Sections 65450-65457 and outlines the regulatory, design, implementation, financing, and infrastructure framework to leverage transit investments in the Florence-Firestone Community. Per State law, specific plans must be internally consistent with the general plan. The Specific Plan is consistent with, and provides a framework for, implementing the goals, land uses, and policies of the General Plan, broader TOD goals of the County, and the FFCP.

Florence-Firestone contains three of the eleven areas in the County where Specific Plans have already been adopted or are being considered to implement the County's TOD program, which is included as part of the General Plan 2035.




## Foundational & Related Documents

- County of Los Angeles General Plan
- County of Los Angeles Transit Oriented District ("TOD") Program
- County of Los Angeles TOD Toolkit
- County of Los Angeles Vision Zero Plan
- County of Los Angeles 2012 Bicycle Master Plan
- Step-By-Step Community Pedestrian Plans
- Florence-Firestone Community Plan (FFCP)
- Florence-Firestone Community Standards District (CSD)
- 2016 SCAG RTP/SCS
- California Transportation Plan 2040
- Our County Sustainability Plan

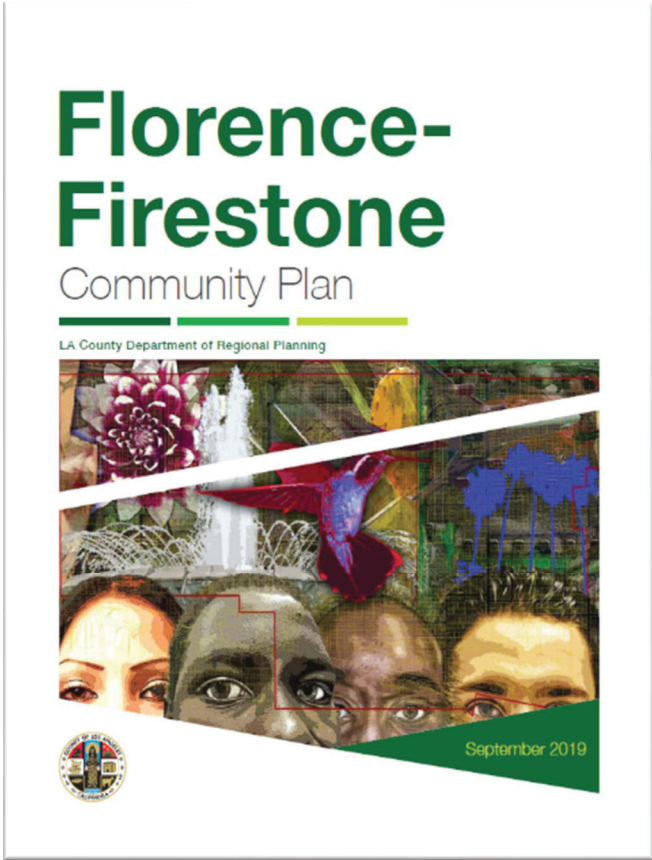
LA Metro Documents:

- West Santa Ana Branch (WSAB) TOD Strategic Implementation Plan
- Slauson Blue Line Station Transit Oriented Development Technical Assistance Panel Program (ULI)
- Transit Oriented Communities (TOC) Toolkit
- First/Last Mile Strategic Plan & Toolkit
- Rail-to-Rail and Rail-to-River Projects
- Green Places Toolkit

Implementation of local and regional vision requires collaboration across jurisdictions and documents. The foundational and related documents outlined in the sidebar also establish goals, policies, and plans applicable to transit-oriented development in the Specific Plan Area.

### 1.2.2 Supplementing the Florence-Firestone Community Plan

The FFCP was adopted in September 2019 through a County-led effort supported by community outreach. The FFCP includes goals and policies related to TODs. The FFTOD Specific Plan is designed to implement the TOD themes of the FFCP by providing new design standards and implementation actions to support TOD development.




### Link to the Florence-Firestone Community Plan

This Specific Plan implements the FFCP Goal TD-1: Residents can live, work, learn, and recreate in a transit-oriented community.

The land use, zoning, design, and mobility standards of this Specific Plan also implement a variety of FFCP policies including, but not limited to:

- ✓ **Policy TD-1.1: Housing and Mixed-Use Development**
- ✓ **Policy TD-1.2: Urban Design**
- ✓ **Policy TD-1.3: Public Facilities and Transit**
- ✓ **Policy TD-1.4: Incentives Specific Uses**
- ✓ **Policy TD-1.5: Active Ground Floor**
- ✓ **Policy TD-1.6: Infrastructure Improvements**

Throughout the document you will see this symbol to help identify how the FFCP is being implemented by this Specific Plan.

## 1.3 Setting & Background

### 1.3.1 Location

Florence-Firestone is an unincorporated community approximately six miles south of Downtown Los Angeles and has an area of 3.48 square miles. The community is surrounded to the north, south, and west by the City of Los Angeles, and to the east by the City of Huntington Park, City of South Gate, and the unincorporated community of Walnut Park. The community is located between Downtown Los Angeles and Downtown Long Beach in proximity to major employment centers, including Downtown Los Angeles, the Ports of Long Beach and Los Angeles, and the industrial sector in southeast Los Angeles County. See Figure 1-4: Regional Location for the regional location of the Specific Plan Area.

### 1.3.2 Specific Plan Area

The Specific Plan Area covers the entirety of the Florence-Firestone community. Generally, the Specific Plan Area is bounded to the north by Slauson Avenue; to the west by S Central Avenue from Slauson Avenue to E 103rd Street; to the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and to the south by E 103rd Street and E 92nd Street. See Figure 1-5: Specific Plan Area.

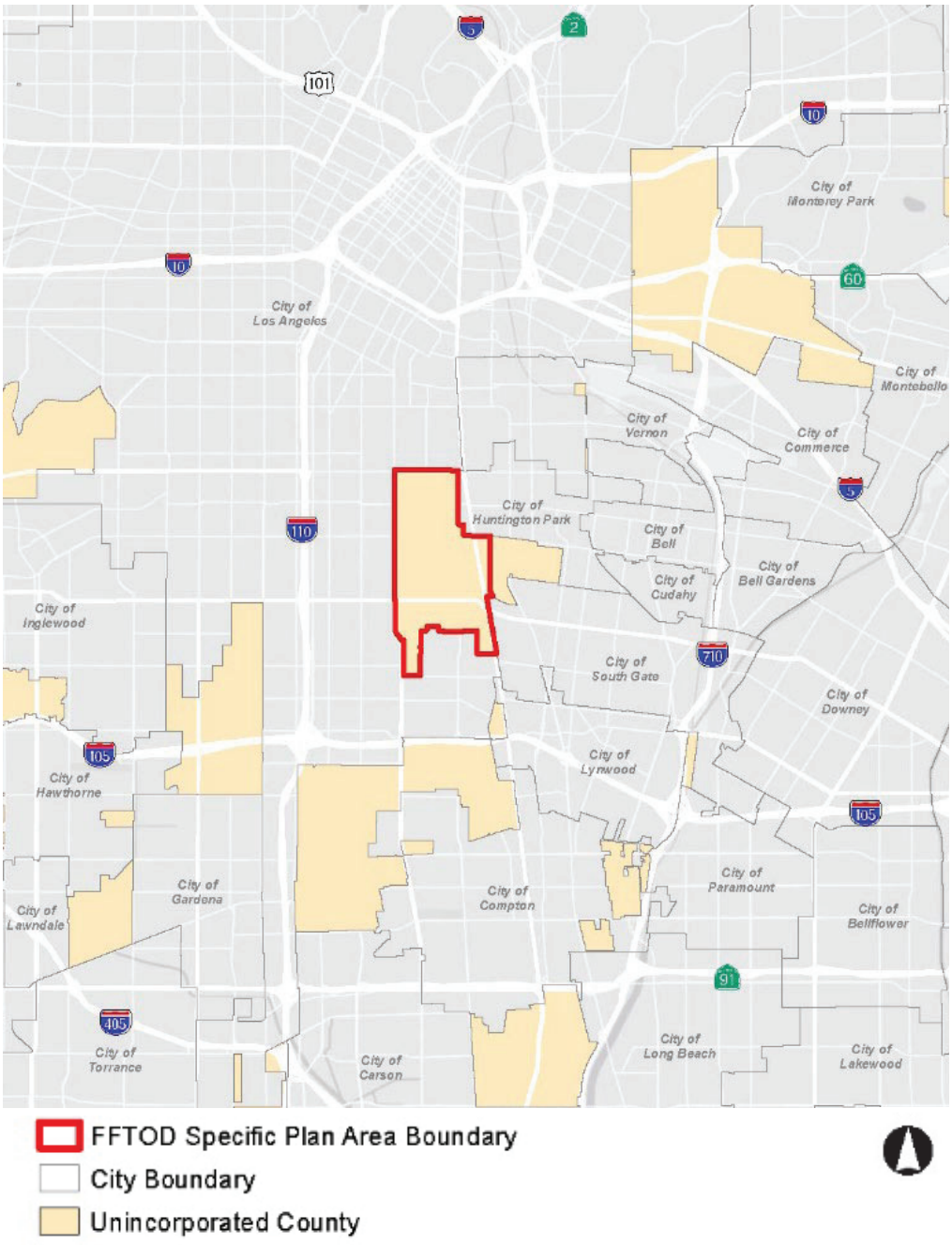
There are three Metro A Line (Blue) Stations in Florence-Firestone: the Slauson, Florence, and Firestone Stations. The ½ mile radius around each of these stations is considered the TOD for that station. The Slauson and Firestone Stations are aerial stations with elevated platforms, accessible by stairs or elevator from the street.



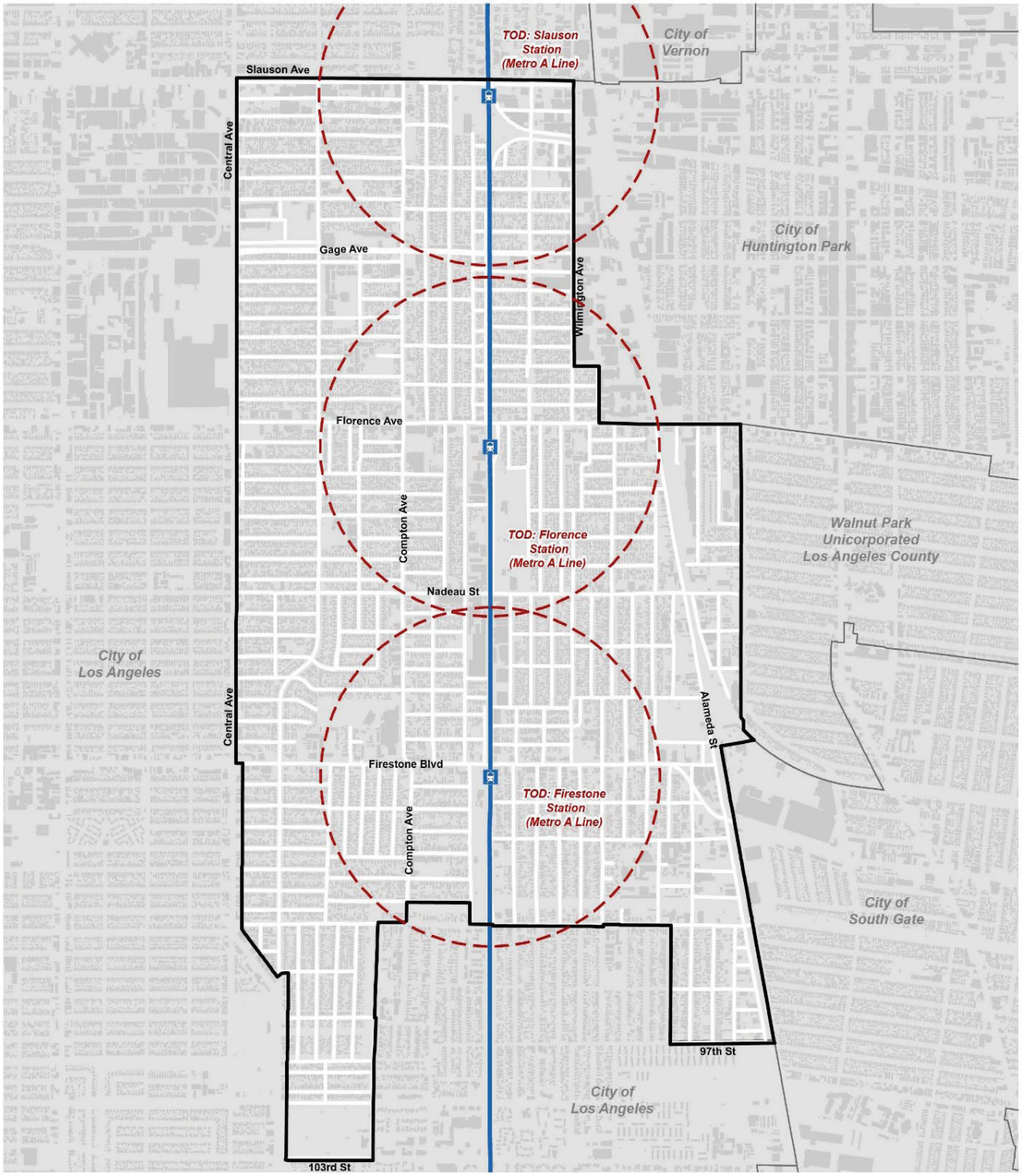

Slauson Station aerial platform (top left), Firestone Station entry (top right), Florence Station at-grade platform (bottom)

The Specific Plan Area has a rich history. The broader region, including the Florence-Firestone community, was originally a roaming area for the Gabrielino/Tongva indigenous tribe. The area then went through an agricultural period, eventually transitioning into a manufacturing hub along the Southern Pacific Railroad line. The ethnic and cultural identity of the community has also evolved through various periods, with a notable history of disenfranchisement of the local residents. For more information on the community history of Florence-Firestone, see Chapter 2 of the FFCP.

## Figure 1-4: Regional Location



## Figure 1-5: Specific Plan Area



### 1.3.3 Existing Conditions

During the preparation of this Specific Plan, a "Community Atlas" and "Equity and Mobility Study" were created to document existing conditions specific to the TOD areas in Florence-Firestone. These reports can be found at: https://planning.lacounty.gov/fftod/Documents.

The Community Atlas notes that the existing uses in the TOD areas are not conducive to promoting transit-oriented development and provides a number of specific recommendations that form the foundation of the design standards and implementing actions for the Specific Plan. See the Community Atlas Summary to the right for an overview of the study's findings and recommendations, and the examples of existing land uses within the TODs below.

**Community Atlas Snapshot: Station Area Typical Existing Uses**




## Community Atlas Summary

### Land Use & Urban Design Findings

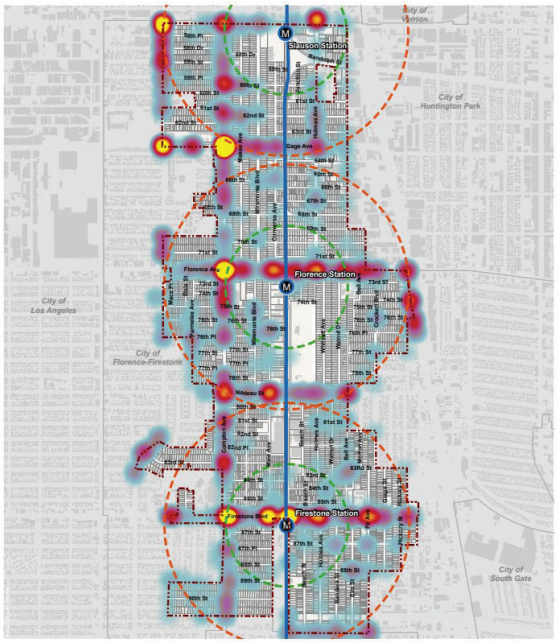
- Existing uses along major corridors are predominantly low-scale, one-story, light industrial buildings with interspersed residential homes.
- Industrial or utility uses create challenges for pedestrians accessing jobs and the Metro stations.
- Densities in excess of 18 and 30 homes per acre are necessary to support new transit oriented development.
- Existing residential zoning does not enable the densities identified by the Florence-Firestone Community Plan (FFCP).
- Residential properties are small with evidence of overcrowding due in part to conversion of garages into living quarters and high number of persons per household.

### Land Use & Urban Design Recommendations

- Combine mobility improvements with focused updates to land use categories to enable more people to access Metro stations, and to live and work in proximity to the stations.
- Supplement existing uses to foster a complete community that supports living, working, learning, and playing in the Florence-Firestone community.
- Establish development zoning standards around TOD types that provide appropriate protections and transitions for this community.
- Explore creative parking strategies that balance transit-focused typologies with existing residential parking challenges.
- Evaluate industrial land use policy and zoning intent and potential for adaptation to support TOD development
- Review residential zone standards to introduce and enable a wider range of housing types and densities.

The Mobility & Equity Study combined conventional assessment of transportation conditions with an evaluation of equity conditions related to demographics, land use characteristics, and socioeconomic conditions[1], because the level of investment in transportation infrastructure and services is often a direct reflection of a community's socio-economic and demographic status. The study established equity goals and identified existing county-wide policies to support these goals, identified best practices for advancing equity in TOD planning, assessed displacement risk within the FFTOD Specific Plan Area, assessed conditions and trends for all travel modes, and provided a series of recommendations based on these findings, summarized to the right.

**Mobility & Equity Study Snapshot: Total Collisions - 2014-2018**




In addition to conditions assessed in the Community Atlas and Equity and Mobility Study, the FFCP describes the physical, social, and economic conditions for Florence-Firestone; see Chapter 3 of the FFCP for more information.

## Equity & Mobility Study Summary

Demographic, socioeconomic, and TOD-specific equity metrics provided baseline insight into levels of displacement risk and patterns of neighborhood change. Transportation system metrics provided insight into infrastructure conditions and travel behavior, access to transit and jobs, and equity considerations for transportation-related land use and development standards such as balancing parking requirements with multi-modal transportation investments. Both elements of this study helped to frame and refine the community outreach approach and Specific Plan standards.

### Equity Recommendations

- Ensure that current tenant, homeowner, and workforce protections are being used to their full potential and pursue additional policies to expand access to critical resources and infrastructure.
- Establish and reinforce long-term planning partnerships with community organizations.
- Align TOD land uses and densities with tailored needs for residents and businesses who may be most vulnerable to displacement.
- Due to the area's high overall housing cost burden, identify robust affordability policies and funding mechanisms that allow new development to successfully serve existing residents and businesses.

### Mobility Recommendations

- Identify and prioritize improvements to well-documented infrastructure issues and dangerous conditions for people who travel on foot and by bike.
- Seek community input on preferences for travel modes in order to prioritize projects, policies, and programs that will enhance transportation and mobility within the FFTOD Specific Plan Area.
- Determine appropriate levels of parking that are necessary to support the existing community, new development, and compliment future investments in multi-modal transportation improvements.

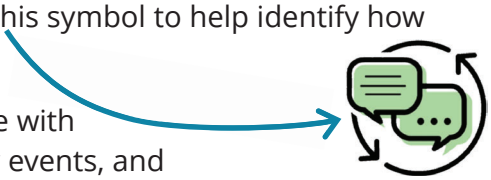
[1] See Equity and Mobility Study Summary for full list of data analyzed: https://planning.lacounty.gov/assets/upl/project/fftod-mobility-equity-study-oct2020.pdf

## 1.4 Community Engagement

Public outreach for the Specific Plan was facilitated through engagement with local community groups, residents, property and business owners, Metro, and the cities surrounding Florence-Firestone.

Development of the Specific Plan and associated community engagement occurred during the COVID-19 pandemic. This created conditions that prevented the County from conducting in-person meetings. As a result, various digital tools were used in combination with the distribution of printed materials to reach as many community members as possible in a range of formats.

Feedback collected from participants helped shape the guiding principles and standards of the Specific Plan. Throughout the document, you will see this symbol to help identify how feedback was incorporated.



Each stage of community engagement is summarized here with information on the engagement process, activities, and/or events, and key themes identified in the feedback received.

### Stakeholder Evaluation
September 2020

As an initial exercise to guide the community engagement process, the County performed a stakeholder evaluation to identify various perspectives within the community.

The evaluation identified 32 Stakeholder Organizations – ranging from community-based organizations to business associations, service providers, elected bodies, and government agencies. These organizations were invited to provide feedback and assist with notifying and encouraging participation from community members throughout the planning process.

### Online Town Hall
October 2020

The County held an Online Town Hall meeting in October 2020 to share information and answer questions about four planning efforts that would affect the community, including the FFTOD Specific Plan. The FFTOD presentation provided a project overview and timeline, information on community engagement and feedback opportunities.




During the town hall, participants were asked to respond to a series of poll questions about their relationship to Florence-Firestone (50% work in the area; 46% live in the area), their #1 housing issue or problem (59% have a high rent/mortgage payment), and their preferred mode of transportation (86% prefer to drive).

The presentations and polls were followed by a question and answer session, in which participants asked a variety of questions regarding the planning and outreach process. Recurring themes in the Q&A session included concerns around housing affordability, and questions around how the County plans to conduct sufficient community outreach and incorporate input into the plan.

## Focus Groups and Conversations with Community Partners
October 2020

To gather detailed input from a variety of community perspectives, the County held multiple focus group sessions and conversations with community leaders and representatives identified in the Stakeholder Evaluation. Focus group sessions consisted of a short project overview presentation, a guided community mapping exercise, and conversations about the project's goals of increasing active transportation and transit use, increasing residential density near transit, encouraging affordable housing, increasing economic activity, and facilitating investment in infrastructure improvements.

The focus group sessions provided valuable insights to help inform planning considerations relating to housing, mobility, neighborhood preservation & local support, and a variety of other community values and concerns.

## Online StoryMap
Ongoing

Available from September 2021 through the life of the project, the online "StoryMap" website provides an easily-accessible overview of the proposed FFTOD Specific Plan, including introductory information on the Specific Plan, the County's Transit-Oriented District Program, and the plan's Equity Goals, Land Use Objectives, Proposed Land Use, and Proposed Zoning. Features of the StoryMap include an interactive map to compare existing and proposed zoning designations. You can access the StoryMap here: English FFTOD story map / Spanish FFTOD story map




## Online Community Mapping Activity
December 2020

Community members were invited to participate in an online mapping activity to help gather experience-based insights, priorities, and ideas for the FFTOD Specific Plan Area. Online maps were provided for areas surrounding each of the three Metro stations, and participants added a total of 230 location-based observations, concerns, and ideas. Each comment used a 'topic marker' (as shown on the map to the right) relating to: Important Buildings; Important Places; ADA/Access; Art/Mural Ideas; Walking Ideas; Cycling Ideas; Transit Ideas; Driving Ideas; Parking Ideas; Public Space Ideas; and Other Ideas.



## Educational Packet & Worksheet February-April 2021

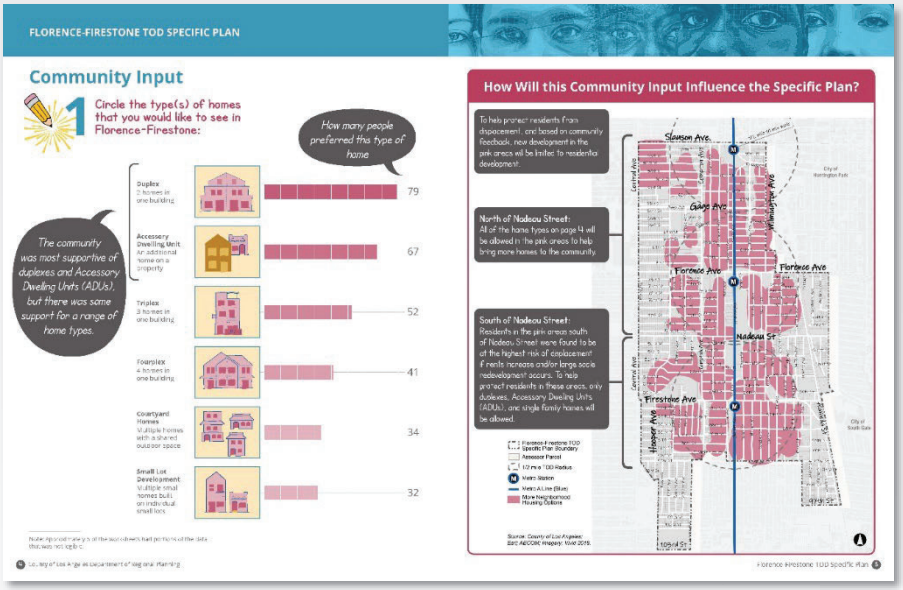
In response to feedback and concerns around preferred engagement methods and barriers to computer/internet access, the County distributed a printed and easy-to-understand Transit-Oriented Planning Guide with a companion Community Feedback Worksheet in February of 2021.

Community members returned 152 completed worksheets and provided feedback on the types of housing and mobility strategies desired by community members for Florence-Firestone.

Specific Plan standards, including setbacks and allowed heights, were adjusted in response to community input from the worksheets.

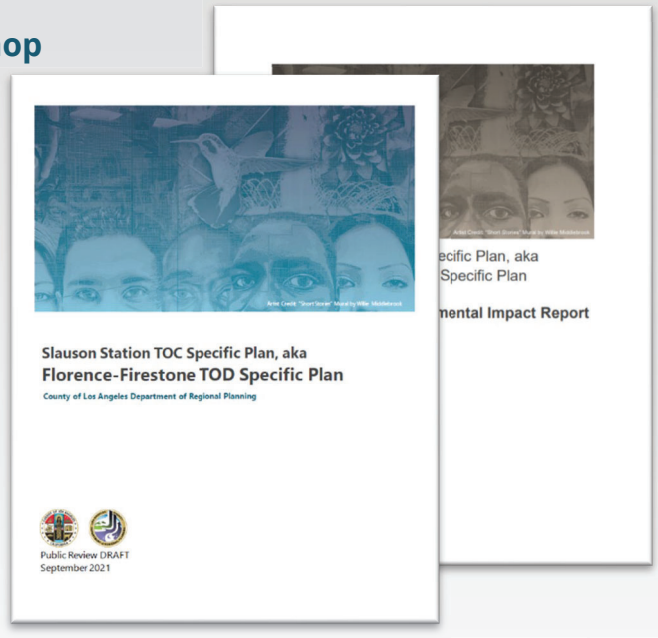
[View full summary of input received via Community Feedback Worksheets]




## Public Review Draft Workshop October 2021

The Draft FFTOD Specific Plan and Program EIR were made available for formal public review period from September 21, 2021 to November 5, 2021. Both draft documents were issues with a notice of availability consistent with CEQA noticing requirements. During the public review period a public workshop was held in October of 2021 as an online interactive meeting, providing an overview of key proposed zoning standards. Participants were engaged to ask questions about the plan and provide comments on their view of the draft Specific Plan. The County also held "Office Hours" for the public to engage in individual review and questions.



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Art Credit: “Short Stories” Mural by Willie Middlebrook

# Purpose & Guiding Principles

# 2 Purpose & Guiding Principles

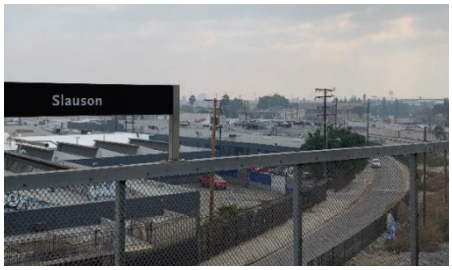
## 2.1 Introduction

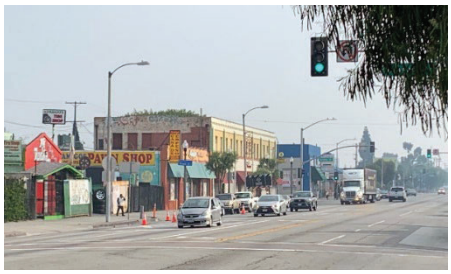
This Chapter describes the FFTOD Specific Plan approach to land use, urban design building standards, and mobility improvements to enable a transit-oriented community while serving existing residents, workers, and small-business owners. Guiding principles to support this approach and reinforce the FFCP vision are also included in this Chapter.

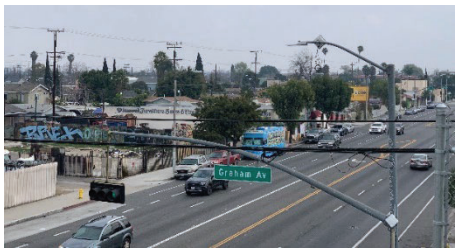
## 2.2 Purpose of the Specific Plan

The Specific Plan creates a land use and zoning policy tool for the unincorporated Florence-Firestone community that aims to:

- ✓ Enable more opportunities for affordable housing;
- ✓ Encourage transit-oriented development and promote active transportation;
- ✓ Improve access to the three Metro A (Blue) Line Stations: Slauson, Florence, and Firestone;
- ✓ Reduce vehicles miles traveled by cars; and
- ✓ Streamline the environmental review of future development projects.






The Specific Plan focuses on updates to land use, urban design, and mobility within the Slauson, Florence, and Firestone TOD station areas

The Specific Plan development standards are designed to balance TOD development with community benefits that support local residents, workers, and small business owners. To achieve this balance, each of the three TOD station areas within the Specific Plan Area has been assigned a unique land use and design approach, which is introduced in Chapter 3.

Florence-Firestone will become an important transportation hub due to various actions occurring in the area. Through this Specific Plan, the land use and mobility concepts focus on improving the connection between the community and the three Metro transit stations, with an emphasis on increasing safety for those traveling to the stations using modes of transportation outside of the single occupancy vehicle. Aside from serving the A-line ridership, the Slauson Station is also the future home of a new West Santa Ana Branch (WSAB) light rail stop. The WSAB transit corridor is planned to connect southeast Los Angeles County to downtown Los Angeles, serving the cities and communities of Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, and Florence-Firestone. Metro is also planning the Rail to Rail/River Active Transportation Corridor project (Rail to River project) that will extend along Slauson Avenue within the TOD area, but outside the Specific Plan boundary. The Rail to River project, which spans approximately 10 miles, will convert an existing, underutilized railroad right-of-way into a multi-purpose pedestrian and bicycle transportation corridor. Segment A of the project connects the future Metro Crenshaw/LAX Line Fairview Heights Station to the Metro J Line

(Silver) I-110 freeway Slauson Station and Metro A Line (Blue)/future WSAB Slauson Station. Segment B of the project connects the Metro A Line (Blue) east to the Los Angeles River.

## 2.3 Guiding Principles

***"Florence-Firestone is a resilient and healthy community with a strong identity, vibrant local economy, high quality, and affordable housing, ample greenery, safe and efficient transportation system, high-quality education, quality jobs, and inviting commercial corridors where people gather and socialize."***

- Florence-Firestone Community Plan Vision

The Specific Plan builds from the community-generated vision statement of the FFCP, provides a framework for projects proposed under the Specific Plan, and supports the overall transit-oriented goals of the TOD areas shown in Figure 1-1: FFTOD Specific Plan Area & TODs. The guiding principles reinforce the policies of the FFCP to guide TOD development.

These guiding principles were informed by community feedback from public outreach conducted during the Specific Plan process.

**Guiding Principle 1:** ***Promote pedestrian-friendly, active transit-oriented districts and corridors that support land uses that provide a variety of local services, employment, and housing.***

This Specific Plan establishes zoning designations for Florence-Firestone to support TOD development strategies for the community. Four mixed-use zones are located near the transit stations and along major corridors like Compton Avenue, Holmes Avenue, and Nadeau Street. These zones establish setbacks that, through private development over time, can increase the width of the sidewalks while providing a range of formats for new employment and services. Mobility improvements, such as street crossings and bulb-outs, are also identified to make walking, biking, and rolling in the community easier.

### Implementing the FFCP

The FFTOD Specific Plan guiding principles build off the transit-oriented development theme in the FFCP, which calls for the development of a Specific Plan for the community.

Transit Oriented Development (TOD) Theme

Transit-oriented development is a cross-cutting theme in the FFCP:

*For areas around Metro Blue Line Stations, encourage the development of high-density affordable housing, promote the establishment of job-generating uses, support the development of community-serving retail uses, and adopt a TOD Specific Plan for Florence, Firestone, and Slauson Blue Line Stations.*

This Specific Plan implements the TOD theme through Implementation Action 44: Transit-Oriented District Specific Plans, and Policies TD 1.1-1.6 and TD 2.1-2.5.

**Guiding Principle 2:** ***Increase housing supply near transit that includes a variety of options for residents and families at different income levels.***

This Specific Plan creates four new residential zones that permit a variety of configurations, unit sizes, densities, and affordability. New housing options and more affordable units are expected to be built in the community in conjunction with the Density Bonus Ordinance and other County affordable housing programs.

**Guiding Principle 3:** ***Support a green community through enhanced streetscapes, a variety of publicly accessible open spaces, landscaping, and sustainability.***

This Specific Plan will require new development along major corridors to increase the width of the sidewalks through setbacks, install street trees, provide publicly accessible open space, and contribute to more greenery in the community.

**Guiding Principle 4:** ***Encourage placemaking that embraces the vibrant culture of the community.***

This Specific Plan incentivizes community-supportive uses, promotes public art and murals, and requires large developments to construct publicly accessible open spaces or other community amenities. Preservation of historically and/or culturally important properties in Florence-Firestone, including the potential identification of a historic district, is also encouraged.

**Guiding Principle 5:** ***Support local jobs and opportunities through a variety of employment-generating uses.***

The Specific Plan introduces the Industrial Mix zone and four mixed use zones. These zones will allow for a broad range of production, services, and retail uses, expanding the types of businesses permitted, which can bolster the range of jobs in the community and allow for flexibility as markets shift. Locations within the community have been strategically identified, for example, along the Alameda Corridor, which will be preserved as light or general industrial properties. Other locations are transitioned to more appropriate employment uses that are compatible with adjacent residential uses.

### COMMUNITY FEEDBACK: Guiding Principles



Community participation in FFTOD Specific Plan outreach activities helped shape the Guiding Principles. All feedback collected from the public and stakeholders across all outreach events were considered to form statements that set a clear course for TOD improvements in the community.

**Guiding Principle 6:** ***Improve safety, connectivity, access, and ease of use for all modes of transportation.***

This Specific Plan identifies key street and sidewalk improvements to be implemented by the County. All public right-of-way improvements identified by this Specific Plan are intended to balance connectivity, access, and ease of use for people walking, biking, rolling, using transit, and driving in the community. Mobility strategies are focused on increasing access and connectivity to transit stations through new infrastructure and facilities that increase safety and support increased transit ridership over time.

**Guiding Principle 7:** ***Promote equitable outcomes and inclusive economic development through tailored and carefully regulated approaches to growth.***

This Specific Plan balances potential change and growth with support for existing residents, businesses, and services, based on combination of displacement risk data and qualitative community insights. New zones in the Firestone TOD area address higher displacement risk by maintaining a similar density to the existing neighborhood, supporting owners and renters in place by allowing the incremental addition of units, and lowering the likelihood of developer-based consolidation. In areas with lower displacement risk like the Slauson TOD area, new zones introduce uses that allow more neighborhood services, jobs, and housing, with development standards that enable a broad range of housing types and densities.

**Guiding Principle 8:** ***Collaborate with other local and regional entities to implement plan objectives efficiently and comprehensively.***

Ongoing collaboration with local organizations, other County departments and agencies, and regional entities is needed for the Specific Plan to promote long-term community stability, economic success for local residents and businesses, mobility enhancements, climate resilience, and achievement of environmental justice goals. Collaboration is also critical for planning processes, programs, and policies to be streamlined and effective within existing countywide and regional systems. Suggestions for collaborative action are identified in Chapter 7: Implementation.

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Art Credit: “Short Stories” Mural by Willie Middlebrook

# Land Use & Urban Design Framework

# 3 Land Use & Urban Design Framework

## 3.1 Introduction

This chapter describes the approach to land use and urban design that will allow transformation of the Specific Plan Area into a vibrant, transit-oriented community, while strengthening access to transit and neighborhood-services for existing residents. Planning for Transit Oriented Districts is traditionally focused on zoning that concentrates the highest allowed density within a quarter mile or half mile radius surrounding transit stations. This approach, often referred to as "upzoning", seeks to benefit both the transit system and the transit-adjacent community by:

- Increasing the amount of housing within walking or biking distance of transit,
- Increasing workplaces, services, and other regional destinations that are accessible by transit,
- Enabling daily-needs to be met through walking or biking trips, and
- Reducing automobile emissions by providing transit, walking, and rolling options.

However, research and input from the Florence-Firestone community have shown that not every transit station area is an ideal candidate for significant upzoning, as a sudden influx of development and investment in lower-income communities can be destabilizing for existing residents, small businesses, and service providers. The approach for this Specific Plan carefully balances increasing opportunities for more housing, workplaces, and services with the need to provide stability and address existing challenges for renters, homeowners, and businesses in the area. Within the FFTOD Specific Plan Area, each of the three TOD areas has a distinct identity and potential for changes in land use and density; these conditions and objectives are discussed in detail in Section 3.2.The Specific Plan concepts and standards were directly informed by analysis from the Equity & Mobility Study, and all stages of community input. For example, decisions around allocation of housing density were informed by census tract-level displacement risk metrics and community concerns around affordability, many of which cited examples of recent developments that invite higher-income residents into the neighborhood while remaining inaccessible to existing community members in need of affordable housing. The Specific Plan also recognizes a strong community-wide desire to preserve local landmarks, businesses, and local support systems that contribute to Florence-Firestone's sense of place, history, and identity.

A major component of TOD planning is mobility – both ensuring that transit is safe and easy to access for all users and reducing the need for local automobile trips in the station area. While the community broadly supported safety and connectivity improvements for pedestrians and bicyclists throughout the plan area, other traditional TOD planning strategies such as reduced in parking requirements were met with equity concerns in the context of Florence-Firestone's large average household size and high number of residents who work in areas not served by transit, or need to drive between multiple jobs (often in addition to transporting children or other dependents). Both the Equity & Mobility Study and community feedback highlighted basic infrastructure and safety improvements as a priority for the Specific Plan Area.

## 3.2 Concept Framework & Objectives

As shown in **Figure 3-1: Specific Plan Concept**, the Specific Plan is generally focused on the three TOD areas surrounding the Metro Slauson Station, Florence Station, and Firestone Stations. Each TOD area supports a distinct range of land uses, building forms, and overall levels of change and development potential. The Specific Plan Concept map illustrates the three broad categories of land use and change envisioned for the Specific Plan Area: "Low Change Areas", "More Housing Options", and "TOD Mixed Use Areas". In addition to the broader land use and change categories, the Specific Plan Concept identifies priority areas for various types of mobility improvements including Active Transit Corridors, Pedestrian Priority Streets, Bicycle Priority Streets, and specific locations for formalized pathways, pedestrian bridges, and improved transit access.

"**Maintain**" areas are portions of the community outside of the TOD areas that will maintain existing countywide uses and standards.

"**More Housing Options**" applies to the majority of the TOD areas, and some areas outside the ½ mile station area radii. These areas are generally comprised of established single- and multi-family residential neighborhoods directly surrounding major streets in the Specific Plan Area. While these areas are not designated for major changes in use or urban form, the Specific Plan standards will support a greater variety of housing types and sizes to expand affordable and transit-accessible housing options and increase economic activity for local businesses. Different housing types and densities are allowed in each of the TOD areas.

"**TOD Mixed Use / Job Areas**" generally applies to major streets and activity areas that demonstrate potential for growth, jobs, and/or community-serving land use changes. For example, most parcels along major corridors that are currently zoned for industrial or light manufacturing uses will be re-zoned to support housing, retail storefronts, neighborhood services, offices or a mix of uses. While these areas are grouped into a single category in the Concept Map, land uses and development standards in the Specific Plan are tailored to the specific street or intersection based on existing conditions, community feedback, and displacement risk analysis.

### 3.2.1 Community-Wide Concept

The concepts for each the three Station TOD areas were developed with intention and sensitivity to place-based goals, challenges, and needs, rather than through a "one size fits all" TOD approach. However, the Specific Plan is also intended to enhance cohesion and connectivity between these distinct areas, and to reinforce Florence-Firestone's strong community-wide identity.

Figure 3-1: Specific Plan Concept Map reflects the following overarching objectives of the plan, which build upon the County's TOD Program goals, the FFCP vision, and the guiding principles introduced in Section 2.3 of this plan.

- Focus mixed use zoning (a mix of services and homes) around Metro rail stations to activate those areas.
- Support the Metro Rail-to-River corridor and future West Santa Ana Branch light rail extension through Slauson Station improvements.
- Enhance and expand the public realm through setbacks that expand the sidewalk, pedestrian crossing upgrades, and bicycle facility upgrades.
- Blend new development with existing neighborhoods through massing and setback requirements.
- Combine improvements in sidewalks, bicycle facilities, and setback conditions to create Active Transit Corridors that make accessing stations easier makes it possible to access stations through multiple modes of transportation.

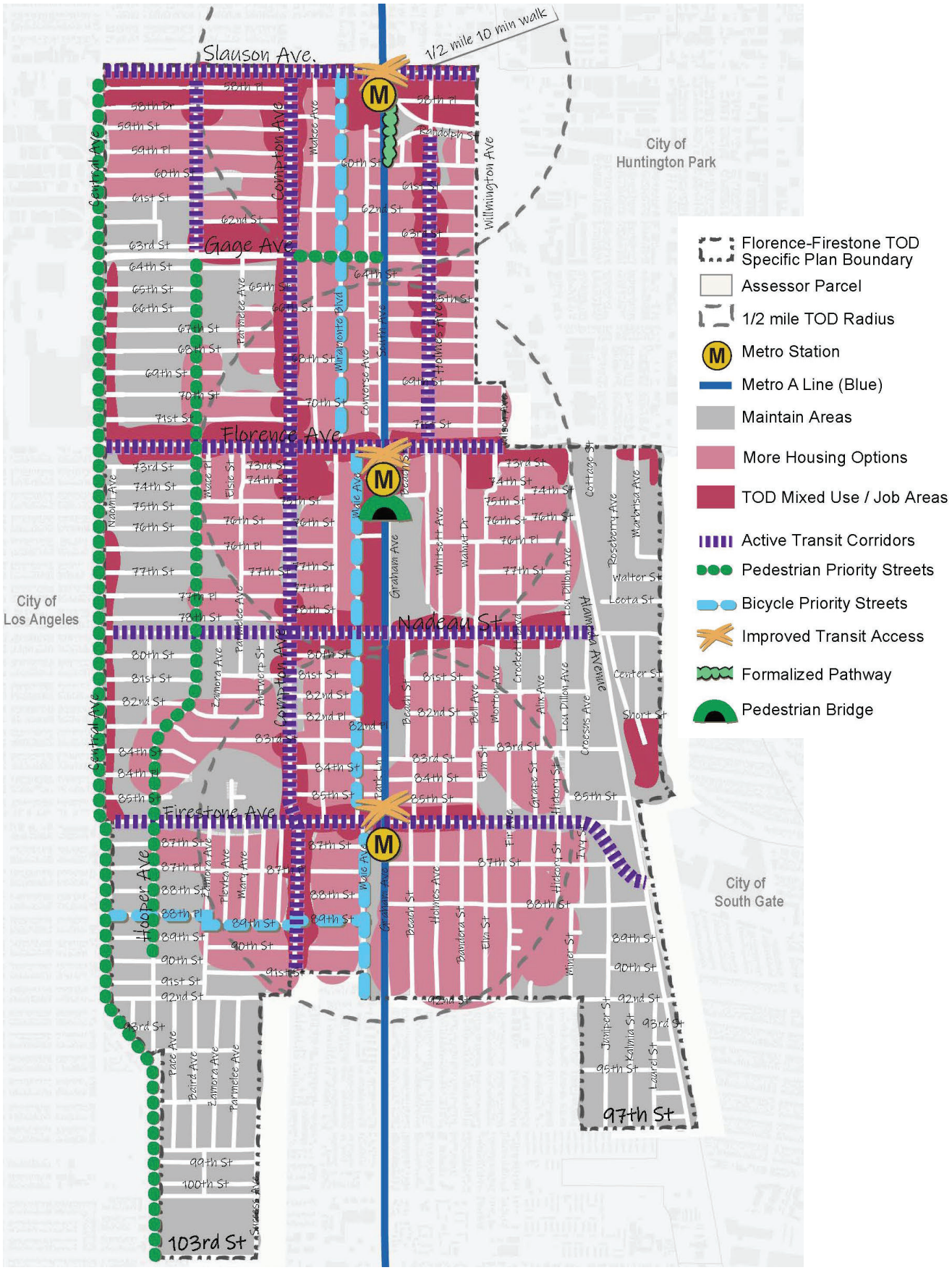






Specific Plan standards are designed to support a range of business and mixed use types.

## Figure 3-1: Specific Plan Concept Map



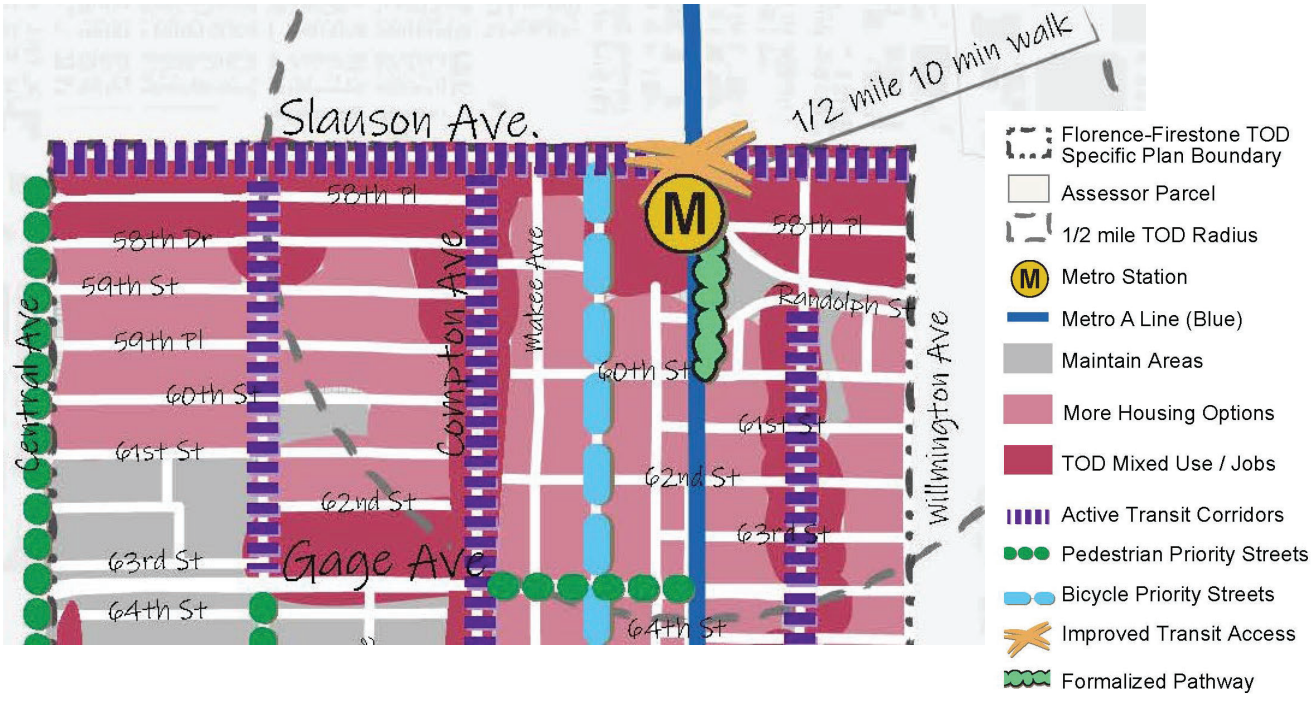
### 3.2.2 Slauson Station TOD Area Concept

The Slauson Station TOD area concept focuses on increasing mixed use opportunities that can combine employment, retail, and housing close to the station. Focusing new development potential in this area would take advantage of the public improvements in the area including the Rail to River corridor on the north side of Slauson Avenue and the future West Santa Ana Branch line that will also use the Slauson Station. For this reason, the Specific Plan envisions the highest intensity development occurring within the Slauson Station TOD area to support adjacent land use changes in the City of Los Angeles and to utilize the plan area's largest infill development opportunity sites.

This concept would allow existing industrial and commercial properties near the station to be redeveloped as mixed use at a higher intensity, increase how many homes are allowed in walking distance to Slauson Station, and introducing newer forms of industrial and employment through 'industrial flex' uses in areas where traditional industrial uses currently operate. The Plan will allow a wide range of housing types including duplexes, Accessory Dwelling Units (ADUs), triplexes, fourplexes, courtyard homes, multi-family, and small lot developments in the "More Housing Options" areas. The "TOD Mixed Use / Jobs Area" will extend to Compton Avenue and Holmes Avenue to create a connected TOD area around the station, allowing for a range of service and entertainment uses, and incentivize uses such as childcare and grocery stores, which are prioritized based on community input.

To enhance multi-modal access within the Slauson Station TOD area, the concept envisions improved wayfinding signage and street crossings, bicycle-supportive infrastructure along Miramonte Blvd., and a formalized pathway from 60th Street to Slauson Station where pedestrians currently travel in uncomfortable and hazardous conditions.

**Figure 3-2: Slauson Station TOD Area Concept**

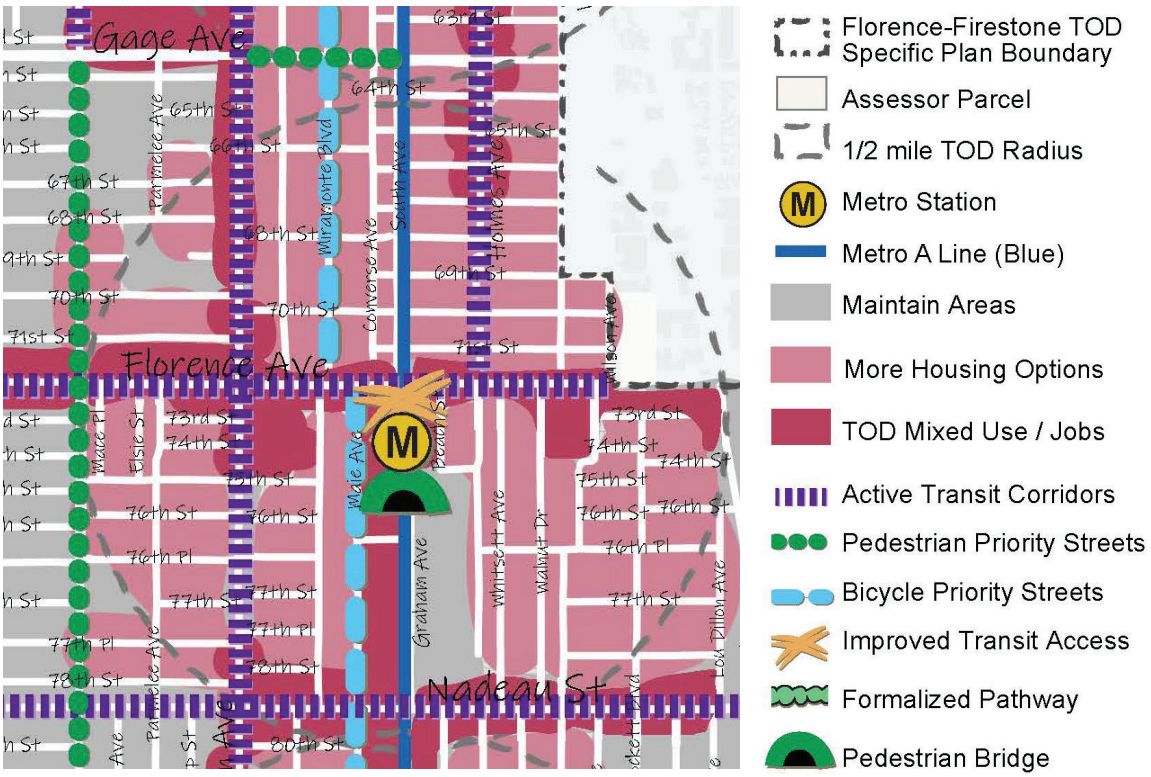


### 3.2.3 Florence Station TOD Area Concept

The Florence Station TOD area concept focuses on supporting and increasing neighborhood services, employment, and more homes near the Florence Station. The concept envisions a variety of uses and housing options similar to those around Slauson Station, however the allowed heights and the number of homes per acre are lower to harmonize the scale of infill development with existing neighborhoods surrounding Florence Station.

As a centrally located corridor with "main street"-style buildings and a vibrant variety of small businesses, cultural landmarks and public art, Florence Avenue serves as the heart of the Florence-Firestone community. The concept intends to reinforce and enhance the "Florence Mile" as an active mixed-use corridor and central destination with a wealth of small retail and dining businesses, neighborhood services, and housing options. The plan will allow a wide range of housing types including duplexes, ADUs, triplexes, fourplexes, courtyard homes, multi-family, and small lot developments in the "More Housing Options" areas. Medium-density mixed-use development opportunities – including the prioritized childcare and grocery stores uses - will be introduced near the transit station along Florence Avenue, Compton Avenue, Nadeau Street, and the Metro A Line (Blue) south of Florence Avenue in the "TOD Mixed Use / Jobs" areas. Consistent with policies to develop a community "civic center" area from the Florence-Firestone Community Plan adopted in 2019, and the rezoning proposed along Compton and Nadeau, a new County library will be added to County facilities on the corner of Compton and Nadeau.

**Figure 3-3: To enhance multi-modal access within the Slauson Station TOD area, the concept envisions improved station access with a new pedestrian bridge and upgraded street crossing next to Slauson Station, and bicycle-supportive infrastructure along Maie Avenue.Florence Station TOD Area Concept**



### 3.2.4 Firestone Station TOD Area Concept

The Firestone Station TOD area concept focuses on creating stability and flexibility for existing residents and business owners and increasing neighborhood services and housing options along major corridors. In response to community concerns around displacement and loss of critical neighborhood resources, the concept reinforces the amount of homes already allowed in the area while creating flexibility for owners to improve their residential properties. This intentional calibration of density and mixed use intensity is expected to result in a lower level of overall change in the Firestone Station TOD area.

In the Equity & Mobility Study's socioeconomic analysis, residents in the Firestone Station TOD area were found to be at the highest risk of displacement if rents increase and/or large-scale redevelopment occurs. To help preserve the stability of these residential neighborhoods while still adding much-needed housing options, the concept encourages conversion of existing homes to duplexes, and the addition of ADUs on existing single-family lots within the "More Housing Options" areas. In the "TOD Mixed Use / Jobs" areas along the Firestone and Compton corridors, neighborhood-scaled mixed use will be allowed to support additional housing near transit, services, and public amenities at Washington Park. These areas are also envisioned to include the community-prioritized grocery store and childcare uses.

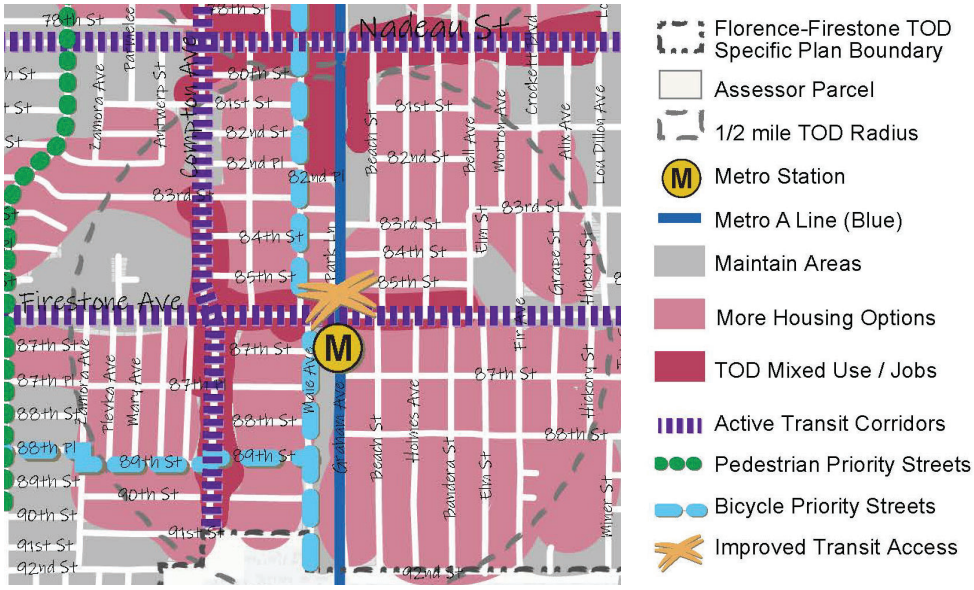
**COMMUNITY FEEDBACK: Housing Types**

Community feedback indicated a preference for duplexes (two homes in one building) and adding Accessory Dwelling Units (ADUs) to existing lots. In addition, the Equity & Mobility Study conducted for the project identified that residents in neighborhood south of Nadeau were at the highest risk of displacement if rents increase and/or large scale redevelopment occurs.

As a result of these findings and feedback, the 'More Housing Option' a new zone was developed for the areas in the Firestone Station TOD to enable existing owners to add or legalize ADUs, make expanding existing homes easier, and disincentivize lot consolidation or larger-scale developments.

To enhance multi-modal access within the Firestone Station TOD area, the concept envisions improved pedestrian conditions surrounding Firestone Station, and bicycle-supportive infrastructure along Maie Avenue and 89th Street.

**Figure 3-4: Firestone Station TOD Area Concept**



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Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Title 22 Chapter 22.418 Florence-Firestone Zones & Development Standards

# Florence-Firestone Zones & Development Standards (Title 22 Chapter 22.418)

Provisions of this Specific Plan relating to Florence-Firestone Zones and Development Standards can be found in Section 22.418 (Florence-Firestone TOD Specific Plan Zones and Development Standards) of Title 22 of the County Code.



Chapter 5

Artist Credit: "Short Stories" Mural by Willie Middlebrook

# Mobility

# 5 Mobility

## 5.1 Introduction & Purpose

To support the TOD-focused strategy of this Specific Plan, this chapter describes strategies to create a multi-modal environment and respond to the need for safer and more user-friendly transportation systems. The mobility infrastructure recommendations identified support transit, pedestrian, and bicycle mobility, and include programmatic improvements to support complete streets and improve parking conditions.

Currently, the vehicle miles traveled (VMT) per service population (a combination of residential and employees) in the Specific Plan Area is 30.2; this VMT value indicates that the Specific Plan service population drives relatively fewer miles than those in the surrounding areas in Los Angeles County. Under the future build-out scenario described in this Specific Plan, VMT per service population is estimated to be 20.3 by the horizon year of 2035. This anticipated reduction in VMT would result from improved provision of services in the community and improved access to transit that reduces the need for people to drive. Additional housing and the associated increased population balances against local job opportunities and services that may be within or near the Specific Plan Area. Under the future Specific Plan scenario, supported by the mobility improvements described in this Chapter, more trips will be able to be made on foot, on bike, or by transit, more comfortably and safely.

## 5.2 Summary of Existing Conditions

The existing conditions in the Specific Plan Area are documented in the Mobility & Equity Study, published as part of this Specific Plan effort in October 2020. For more information on existing roadway network designations, vehicle capacity and volumes, transit routes and headways, bicycle facilities, and collision patterns by mode the report can be found at: https://planning.lacounty.gov/fftod.

Key findings and recommendations from the Mobility & Equity Study are summarized here.

### 5.2.1 Key Findings

- Four major arterials are responsible for the movement of most vehicles, trucks, transit vehicles, and people on foot: Slauson Avenue, Florence Avenue, Firestone Boulevard, and Compton Avenue.
- These four arterials exhibit “hotspot” collision patterns, particularly on Compton Avenue, which also exhibits the greatest difference between posted speeds and observed speeds, indicating an opportunity for traffic calming along this corridor.
- The Specific Plan Area is characterized by high speeds, lack of sufficient pedestrian and bicycle infrastructure, and degraded pavement quality along some streets.
- Pedestrian connections across major arterials, and across the Metro A (Blue) Line itself, are limited, and may create unsafe conditions for people traveling on foot as these conditions encourage riskier choices like crossing at locations without marked crosswalks or signals.

- Transit service is present throughout the Specific Plan Area, but headways are long, particularly in off-peak periods. Improvements recommended in Metro's NextGen Study do not demonstrate a major improvement in headways for most bus lines that serve the Specific Plan Area.
- Compared to the rest of Los Angeles County, socio-economic conditions in the Specific Plan Area seem to be influencing vehicle ownership and use, with higher rates of households that lack access to a vehicle and lower rates of auto mode-share for certain types of trips.
- This data analysis corroborates many of the issues and observations documented in the Metro Blue Line First/Last Mile Plan.

### 5.2.2 Key Recommendations

- Prioritize mobility improvements, specifically those related to pedestrian, transit, and bicycle mobility, that have already been well-documented in prior studies but have not yet been implemented.
- Identify opportunities to align with and support implementation of other County initiatives such as Vision Zero Los Angeles County and Safe Routes to School.
- Determine appropriate levels of parking that are necessary to support the existing community, new development, and compliment future multi-modal transportation investments.

## 5.3 Summary of Major Projects

The County agencies that are responsible for implementing transportation projects in the Specific Plan Area have many major projects underway. These projects are shown in Figure 5-1 (Major Mobility Infrastructure Projects) and include the following:

- Metro's Rail to Rail/River (Segment A) project along Slauson Avenue from the future Metro Crenshaw/LAX Line to the Metro A (Blue) Line Slauson Station, which includes a multi-modal path along the north side of Slauson Avenue and a new crossing at Slauson Station (underneath the rail tracks) (Note: Segment B, which connects the Slauson Station to the LA River, is currently undergoing a Supplemental Alternatives Analysis)
- Metro's West Santa Ana Branch Transit corridor, which will improve regional transit network connectivity at Slauson Station, to points southeast of Florence-Firestone
- Crosswalk upgrades at locations on Slauson Avenue, Compton Avenue, and Firestone Boulevard
- Traffic signal upgrades at locations on Gage Avenue, Florence Avenue, Nadeau Street, Firestone Boulevard, Compton Avenue, Hooper Avenue, and Alameda Street
- Pedestrian improvements along Firestone Boulevard between Central Avenue and Alameda Street
- Bikeway improvements on 88th Place / 89th Street between Central Avenue and Maie Avenue

- Street resurfacing projects (including pavement preservation and roadway reconstruction projects) on local streets in the northeast part of the Specific Plan Area, along Nadeau Street, and on several local streets south of Firestone Boulevard
- New signage and wayfinding throughout the Specific Plan Area

In addition, Metro Active Transportation (MAT) Program grants were awarded to two projects in the Specific Plan Area during the first (2021) cycle, with additional detail to come as planning and design begin:

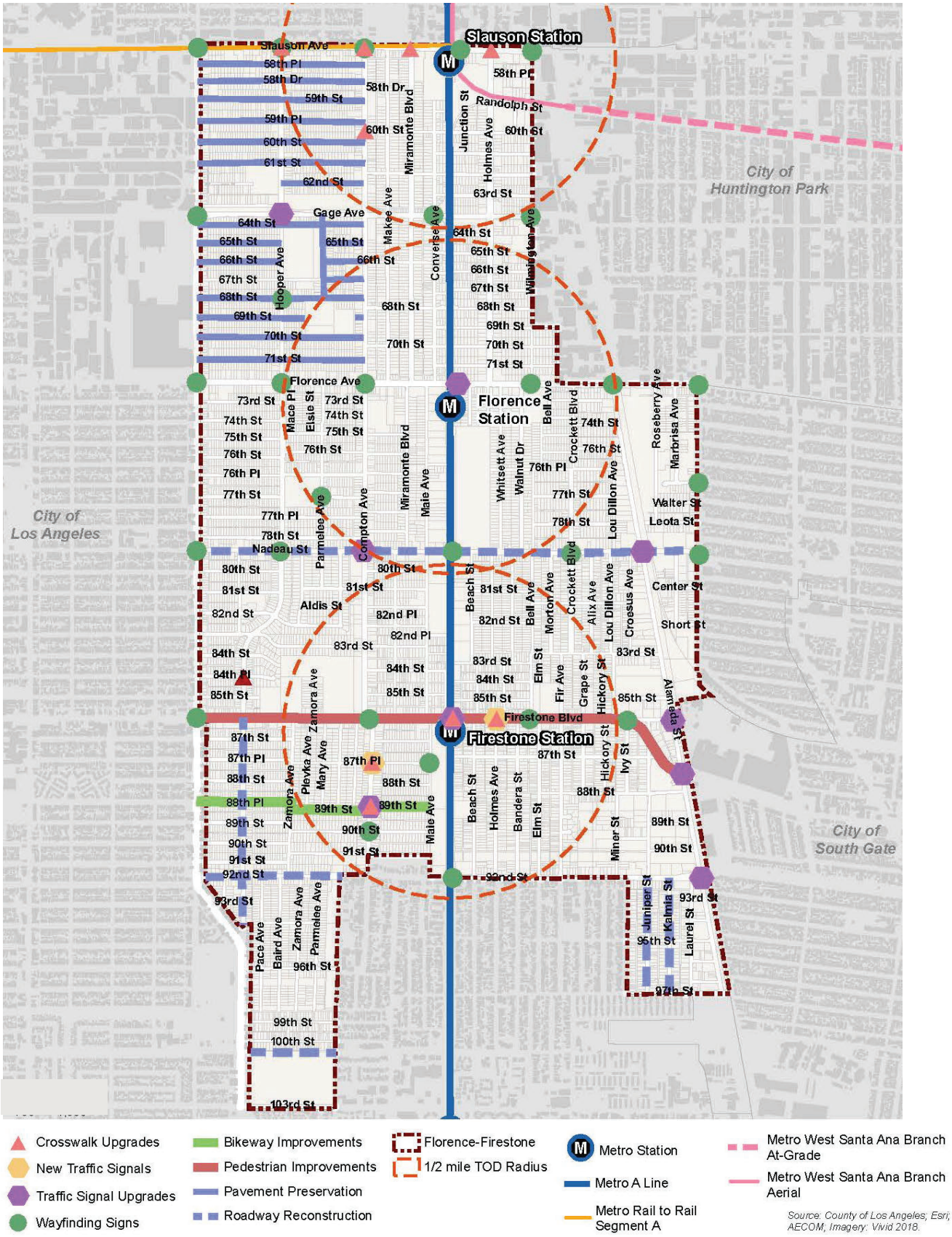
- First/last mile project at Slauson Station
- Randolph Street Active Transportation Corridor

The projects demonstrate ongoing investment in this area, through efforts such as the County Vision Zero program, Metro's First/Last Mile program, and the County Pavement Management System. While some of these infrastructure projects are funded and scheduled to be completed in the next few years, others require additional funding for full implementation and would benefit from ongoing prioritization as the Specific Plan is implemented.

In addition to the mobility infrastructure projects described, three additional planning and land use efforts are underway in the Specific Plan Area:

- The Department of Public Health also has pedestrian planning efforts underway for the Florence-Firestone community, scheduled to begin in 2021
- An Affordable Housing & Sustainable Communities (AHSC) grant application has been submitted for a project along 83rd Street
- LA City Planning Department is developing a Transit Neighborhood Plan (TNP) along Slauson Corridor to complement the Rail to Rail/River investments

## Figure 5-1: Major Mobility Infrastructure Projects



## 5.4 Mode-Specific Improvements

The improvements recommended in this section are the result of ongoing community engagement and professional planning/design work that has been underway in the Specific Plan Area over many years. This section brings the recommendations together from formal planning processes (e.g., the Metro Blue Line First/Last Mile Plan, the FFCP, and the community engagement conducted as part of this Specific Plan) and builds upon them in order to support the land use changes outlines in the prior chapters.

### 5.4.1 Transit

The Specific Plan Area is served by an extensive network of public transportation, including 12 local bus routes operated by Metro and the Metro A (Blue) Line. The three rail transit stations on the Metro A (Blue) Line (Slauson Station, Florence Station, and Firestone Station) serve the Specific Plan Area locally and provide regional access to Downtown Los Angeles, Los Angeles International Airport (LAX), Southeast Los Angeles, Willowbrook/Watts area, Marina del Rey, Playa del Ray, and Playa Vista.

The Link Florence-Firestone/Walnut Park Shuttle (Link) is operated by Public Works and provides transit service to connect communities to key destinations in the Florence-Firestone and Walnut Park communities. The Link serves the Metro A Line (Florence and Firestone Stations) and key destinations including Washington, Bethune and Roosevelt Parks, Florence and Graham Libraries, and other destinations. Service for the Link is provided every 60 minutes every day, except for holidays.

The existing Slauson Station is located at the intersection of Slauson Avenue and Randolph Street. The station is adjacent to the Vermont-Slauson neighborhood in South Los Angeles and is surrounded by industrial and residential land uses, including schools, a park, a playground, and a community center. The area around the Slauson Station lacks sufficient and quality signage and wayfinding, and many sidewalks have both elements obstructing the path of travel and insufficient curb ramps. The entrance on Randolph Street is narrow and acts as a barrier near the station. The station lacks a crosswalk to the bus stop on the other side of Slauson Street, though a new crossing is planned as part of the Metro Rail to Rail project.



Example of a curb ramp and truncated dome

The existing Florence Station is located on the segment of Florence Avenue between Maie Avenue and Graham Avenue. The area within a ½-mile radius from the Florence Station is residential with multiple elementary schools and Roosevelt Park. The area immediately adjacent to the station has wayfinding signage, but the area within a ½ mile, beyond the station footprint, has little directional signage for pedestrians, bicyclists, or transit users. The station can only be accessed from the north along Florence Avenue; there is no south exit/entrance to the station. Many sidewalks are in poor to fair condition and most have curb ramps.

The existing Firestone Station is located at the intersection of Firestone Boulevard and Graham Avenue. The land uses around the station include a mix of industrial and residential areas with high voltage towers, walls, and fences. In addition, most sidewalks are narrow and damaged, and lack sufficient opportunities for crossing. The area lacks crosswalks and lighting, especially under the train overpass where the bus stop is located.

### A. Transit Service Improvements

As more people become residents of this community, in coordination with Metro as part of its NextGen Bus Plan[2] update, this area should be evaluated for increased bus service in the Specific Plan Area. The Link should also be evaluated for expanded service hours into the evenings; improved frequency; and increased destinations, including the Slauson Station area. Expanding the route to serve the Slauson Station and increasing the frequency from approximately 60-minute headways to 10-minute headways would improve local connectivity to destinations within the Florence-Firestone community. It would also improve actual and perceived safety and comfort for riders, particularly female riders, and attract new riders.

### B. Transit Amenity Improvements (Bus Stops and Transit Stations)



Transit Stop Amenity Best Practices Example

Transit stop amenities improve the transit experience. Amenities can include shelters, benches, lighting, transit information, trash bins, bicycle racks, and public art. Well-designed transit stops can improve rider comfort and convenience and attract new riders. Bus shelters also play an important role in transit operations. They provide riders with shelter from varying weather conditions and provide a place to rest and wait. Bus shelters should provide additional amenities, such as benches, bus stop ID, route information, and lighting. Installation of transit amenities, and bus shelters should be installed throughout the Specific Plan Area in coordination with Metro. Where necessary, expansion of the bus stop footprint should be considered through repurposing curb lane space (discussed further in the Flex Zone section of this Chapter).

The underpass beneath the Firestone Station should be prioritized for near-term bus stop improvements. This underpass supports bus stops in the eastbound and westbound directions and serves as a major transfer point. However, the bus stop amenities at this location are minimal due to space constraints. Community input has requested improvements and beautification of this space in the form of better lighting, murals, landscaping, and features to improve perceptions of safety (such as emergency phones). Additional discussion

[2] Metro's NextGen Bus Plan was adopted in 2020 and includes a reimagined bus system that focuses on providing fast, frequent, reliable and accessible service. The NextGen Bus Plan includes service changes, route changes, and stop location changes. More information can be found on Metro's website, at www.metro.net/project/nextgen.

of major improvements at this location is provided in the Major Project Recommendations section of this Chapter.

### 5.4.2 Pedestrian

Overall, the Specific Plan Area lacks a cohesive walking network. The Metro A Line creates a barrier to walkability by splitting the community across a mostly impermeable north/south barrier. Additional freight rail lines, such as the line that travels southeast away from the Slauson Station, create additional challenges to walkability. As described in the Community Atlas, sidewalk widths in the Specific Plan Area range from 6 to 14 feet wide. Some residential and commercial streets have parkways, trees, and space for street furniture, while others are narrow and constrained by walls, without any buffer between pedestrians and vehicle traffic. Also described in the Community Atlas, some of the block sizes in the community are considered walkable, while others are over 600 feet in length and lack sufficient crossing opportunities.

The spacing between crosswalks and signalized crosswalks at intersections varies between 600 and 1,250 feet, which makes pedestrian crossings difficult. Long distances between pedestrian crossings may encourage people to cross at locations that lack supportive infrastructure like painted crosswalks or traffic signals, since reaching such a facility may require longer out-of-direction travel. These conditions reduce both the walkability of the area and safety for pedestrians. See Figure 5-2 (Recommended Pedestrian Improvements Map) for a summary of recommended pedestrian improvements.

#### A. Sidewalk and Lighting Improvements

While sidewalks currently exist on most streets in the Specific Plan Area, some are narrow and substandard in quality. Sidewalks should be improved as new development occurs and should follow the Complete Street Design outlined in the TOD Toolkit. Curb zones should include street trees and supplement traditional street lighting with pedestrian lighting to create an attractive sidewalk environment for pedestrians along commercial corridors. To better implement the TOD Toolkit, the following streets should have pedestrian lighting installed:

- Slauson Avenue
- Gage Avenue
- Florence Avenue
- Nadeau Street
- Firestone Boulevard
- Central Avenue
- Compton Avenue
- Holmes Avenue

To implement the TOD Toolkit, development standards for Specific Plan zones require that private development:

1. Meet street setbacks ranges, contributing to the Frontage Zone and increasing the public realm width
2. Install street trees and pedestrian lighting in Curb Zone for all streets listed.

To guide the implementation of pedestrian street lighting along these corridors and provide clarity for developers, the County should develop guidelines that provide standards for lighting levels, spacing, and light fixture design. The guidelines can provide enhanced standards for streets within a 1/2 mile of each Metro A Line Station to increase pedestrian safety and comfort for transit riders.



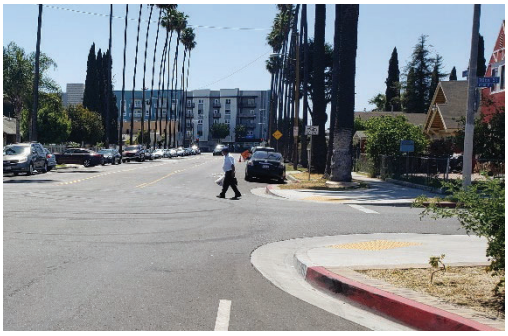
Example of a pedestrian activated beacon



Example of an RRFB



Example of a high visibility marked crosswalk



Example of a curb extension with truncated domes

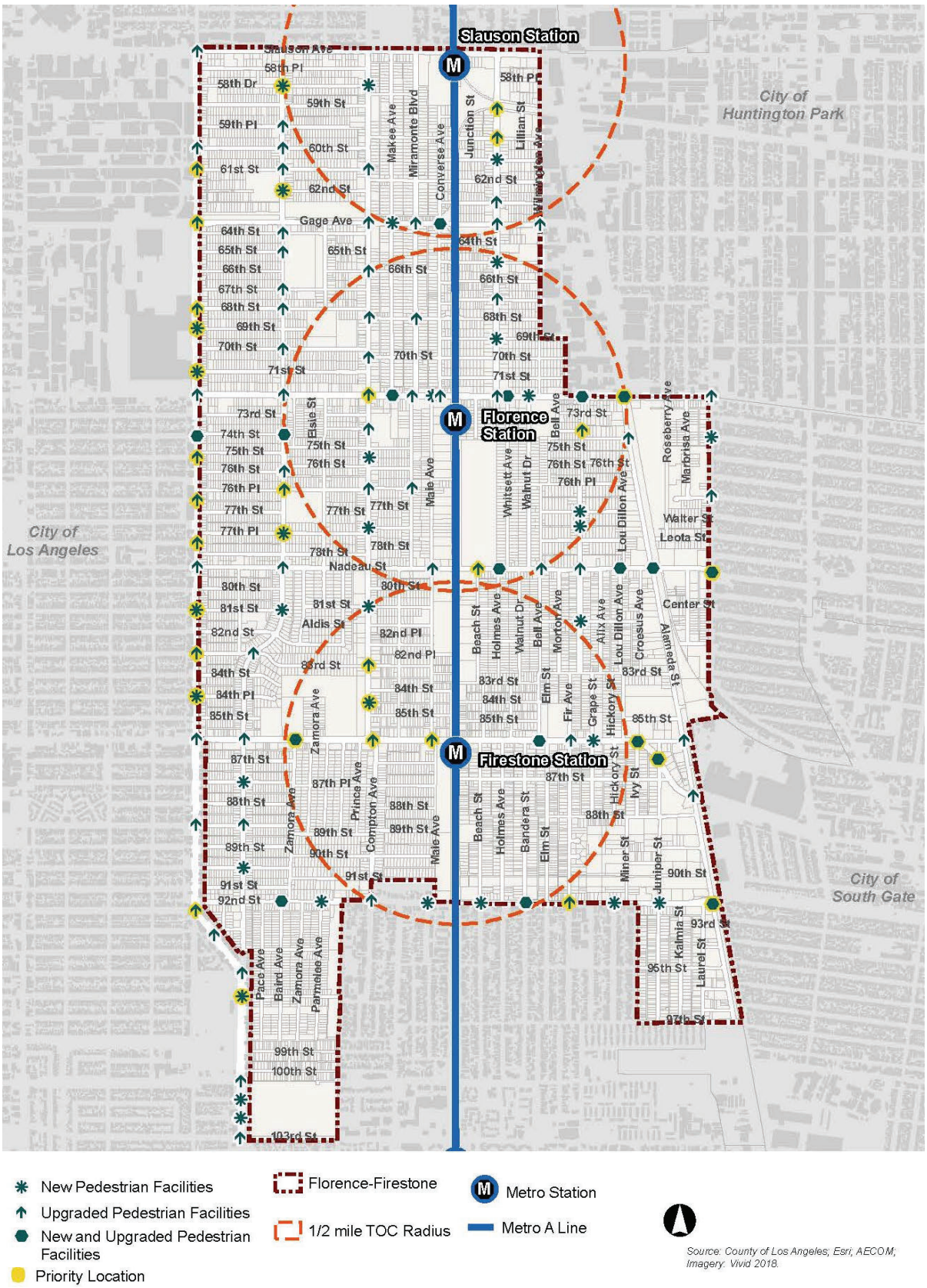
## B. Intersection Improvements

Intersection improvements should be implemented through the Specific Plan Area to enhance the pedestrian environment, improve station access, and calm traffic. These include four major types of improvements:

- Adding/restriping high visibility crosswalks at existing marked crossings (noted in Table 5-1 as "Upgrade Facilities")
- Adding curb ramps, curb extensions (where feasible), and truncated domes at existing marked crossings (noted in Table 5-1 as "Upgrade Facilities")
- Adding Pedestrian Activated Flashing Beacons or Rectangular Rapid Flashing Beacons (RRFBs) at existing marked mid-block crossings (noted in Table 5-1 as "Upgrade Facilities")
- Adding high visibility crosswalks and, where appropriate, Pedestrian-Activated Flashing Beacons or RRFBs at unmarked crossings at intersections and at new mid-block crossing locations (noted in Table 5-1 as "Add New Facilities")

The locations of these improvements are shown in Figure 5-2 (Recommended Pedestrian Improvements Map) and in Table 5-1 (Recommended Pedestrian Improvements). The specific improvements necessary and appropriate for each location should be determined at the time of design, as conditions may change and design standards for elements, such as crosswalks, curb ramps, curb extensions and mid-block crossing treatments may evolve. Priority locations based on existing conditions and surrounding land uses are highlighted in yellow in the Recommended Pedestrian Improvements Map.

## Figure 5-2: Recommended Pedestrian Improvements Map



### Table 5-1: Pedestrian Improvement Recommendations

| Location | Crossing Improvement |
|---|---|
| **Gage Avenue & Central Avenue** | Upgrade Facilities |
| **Gage Avenue & Compton Avenue** | Upgrade Facilities |
| **Gage Avenue & Makee Avenue** | Add New Facilities |
| **Gage Avenue & Miramonte Boulevard** | Upgrade Facilities |
| **Gage Avenue & Converse Avenue** | Upgrade Facilities, Add New Facilities |
| **Gage Avenue & Holmes Avenue** | Upgrade Facilities |
| **Gage Avenue & Wilmington Avenue** | Upgrade Facilities |
| **Florence Avenue & Central Avenue** | Upgrade Facilities |
| **Florence Avenue & Hooper Avenue** | Upgrade Facilities |
| **Florence Avenue & Compton Avenue** | Upgrade Facilities |
| **Florence Avenue & Makee Avenue** | Upgrade Facilities, Add New Facilities |
| **Florence Avenue & Miramonte Boulevard** | Upgrade Facilities |
| **Florence Avenue & Maie Avenue** | Add New Facilities |
| **Florence Avenue & Converse Avenue** | Upgrade Facilities |
| **Florence Avenue & Whitsett Avenue** | Upgrade Facilities, Add New Facilities |
| **Florence Avenue & Walnut Drive** | Add New Facilities |
| **Florence Avenue & Crockett Boulevard** | Upgrade Facilities, Add New Facilities |
| **Florence Avenue & Alameda Street** | Upgrade Facilities, Add New Facilities |
| **Florence Avenue & Santa Fe Avenue** | Upgrade Facilities |
| **Nadeau Street & Central Avenue** | Upgrade Facilities |
| **Nadeau Street & Hooper Avenue** | Upgrade Facilities |
| **Nadeau Street & Maie Avenue** | Upgrade Facilities |
| **Nadeau Street & Beach Street** | Upgrade Facilities |
| **Nadeau Street & Holmes Avenue** | Upgrade Facilities, Add New Facilities |
| **Nadeau Street & Bell Avenue** | Upgrade Facilities |
| **Nadeau Street & Crockett Boulevard** | Upgrade Facilities |
| **Nadeau Street & Lou Dillon Avenue** | Upgrade Facilities, Add New Facilities |
| **Nadeau Street & Alameda Street** | Upgrade Facilities, Add New Facilities |
| **Nadeau Street & Santa Fe/Broadway** | Upgrade Facilities, Add New Facilities |
| **Firestone Boulevard at Central Avenue** | Upgrade Facilities |
| **Firestone Boulevard at Hooper Avenue** | Upgrade Facilities |
| **Firestone Boulevard at Zamora Avenue** | Upgrade Facilities, Add New Facilities |
| **Firestone Boulevard at Compton Avenue** | Upgrade Facilities |
| **Firestone Boulevard at Maie Avenue** | Upgrade Facilities |
| **Firestone Boulevard at Bell Avenue** | Upgrade Facilities, Add New Facilities |
| **Firestone Boulevard at Fir Avenue** | Upgrade Facilities |
| **Firestone Boulevard at Grape Street** | Add New Facilities |

| Location | Crossing Improvement |
|---|---|
| **Firestone Boulevard at Ivy Street** | Upgrade Facilities, Add New Facilities |
| **Firestone Boulevard at Juniper Street** | Upgrade Facilities, Add New Facilities |
| **Firestone Boulevard at Alameda Street** | Upgrade Facilities |
| **92nd Avenue at Central Avenue** | Upgrade Facilities |
| **92nd Avenue at Baird Avenue** | Upgrade Facilities, Add New Facilities |
| **92nd Avenue at Parmalee Avenue** | Add New Facilities |
| **92nd Avenue at Compton Avenue** | Upgrade Facilities |
| **92nd Avenue at Maie Avenue (E Leg)** | Add New Facilities |
| **92nd Avenue at Bandera Street** | Upgrade Facilities, Add New Facilities |
| **92nd Avenue at Fir/Anzac Avenue** | Upgrade Facilities |
| **92nd Avenue at Hickory Street** | Add New Facilities |
| **92nd Avenue at Juniper Street** | Add New Facilities |
| **92nd Avenue at Alameda Street** | Upgrade Facilities, Add New Facilities |
| **92nd Avenue at Beach Street** | Add New Facilities |
| **Central Avenue at Slauson Avenue** | Upgrade Facilities |
| **Central Avenue at 60th Street** | Upgrade Facilities |
| **Central Avenue at 61st Street** | Upgrade Facilities |
| **Central Avenue at 68th Street** | Upgrade Facilities |
| **Central Avenue at 69th Street** | Add New Facilities |
| **Central Avenue at 71st Street** | Add New Facilities |
| **Central Avenue at 74th Street** | Upgrade Facilities, Add New Facilities |
| **Central Avenue at 75th Street** | Upgrade Facilities |
| **Central Avenue at 76th Place** | Upgrade Facilities |
| **Central Avenue at 78th Street (N Leg)** | Upgrade Facilities |
| **Central Avenue at 81st Street** | Add New Facilities |
| **Central Avenue at 83rd Street** | Upgrade Facilities |
| **Central Avenue at 84th Place** | Add New Facilities |
| **Central Avenue at 88th Place** | Upgrade Facilities |
| **Central Avenue at 93rd Street** | Upgrade Facilities |
| **Central Avenue at 95th Street/Hooper Avenue** | Upgrade Facilities |
| **Central Avenue at 96th Street/Colden Avenue** | Add New Facilities |
| **Central Avenue at Century Boulevard** | Upgrade Facilities |
| **Central Avenue at 101st Street** | Add New Facilities |
| **Central Avenue at 102nd Street** | Add New Facilities |
| **Central Avenue at 103rd Street** | Upgrade Facilities |
| **Hooper Avenue at 58th Dr** | Add New Facilities |
| **Hooper Avenue at 59th Place** | Upgrade Facilities |
| **Hooper Avenue at 60th Street** | Upgrade Facilities |

| Location | Crossing Improvement |
|---|---|
| **Hooper Avenue at 61st Street** | Upgrade Facilities |
| **Hooper Avenue at 62nd Street** | Add New Facilities |
| **Hooper Avenue at 64th Street** | Upgrade Facilities |
| **Hooper Avenue at 65th Street** | Upgrade Facilities |
| **Hooper Avenue at 67th Street** | Upgrade Facilities |
| **Hooper Avenue at 68th Street** | Upgrade Facilities |
| **Hooper Avenue at 70th Street** | Upgrade Facilities |
| **Hooper Avenue at 74th Street** | Upgrade Facilities, Add New Facilities |
| **Hooper Avenue at 76th Street (N Leg)** | Upgrade Facilities |
| **Hooper Avenue at 76th Place** | Upgrade Facilities |
| **Hooper Avenue at 77th Place** | Add New Facilities |
| **Hooper Avenue at 81st Street** | Add New Facilities |
| **Hooper Avenue at 83rd Street** | Upgrade Facilities |
| **Hooper Avenue at 87th Place** | Add New Facilities |
| **Hooper Avenue at 88th Place** | Upgrade Facilities |
| **Hooper Avenue at 90th Street** | Add New Facilities |
| **Compton Avenue at 58th Dr (S Leg)** | Add New Facilities |
| **Compton Avenue at 61st Street** | Upgrade Facilities |
| **Compton Avenue at 66th Street** | Upgrade Facilities |
| **Compton Avenue at 68th Street** | Upgrade Facilities |
| **Compton Avenue at 70th Street** | Upgrade Facilities |
| **Compton Avenue at 74th Street** | Upgrade Facilities |
| **Compton Avenue at between 75th Street and 76th Street** | Add New Midblock Crossing |
| **Compton Avenue at 76th Place** | Upgrade Facilities |
| **Compton Avenue at 77th Place (N leg)** | Add New Facilities |
| **Compton Avenue at 81st Street** | Add New Facilities |
| **Compton Avenue at 83rd Street** | Upgrade Facilities |
| **Compton Avenue at between 84th Street and 85th Street** | Add New Midblock Crossing |
| **Miramonte Blvd at 68th Street** | Upgrade Facilities |
| **Miramonte Blvd at 76th Place** | Upgrade Facilities |
| **Holmes Avenue at Randolph Street** | Upgrade Facilities |
| **Holmes Avenue at 60th Street** | Upgrade Facilities |
| **Holmes Avenue at 61st Street** | Add New Facilities |
| **Holmes Avenue at 63rd Street** | Upgrade Facilities |
| **Holmes Avenue at 65th Street** | Add New Facilities |
| **Holmes Avenue at 67th Street** | Upgrade Facilities |
| **Holmes Avenue at 69th Street** | Add New Facilities |
| **Holmes Avenue at Florence Avenue** | Upgrade Facilities |

| Location | Crossing Improvement |
|---|---|
| **Crockett Boulevard at 74th Street** | Upgrade Facilities |
| **Crockett Boulevard at 77th Street** | Add New Facilities |
| **Crockett Boulevard at 78th Street** | Add New Facilities |
| **Crockett Boulevard at Nadeau Street** | Upgrade Facilities |
| **Crockett Boulevard at 81st Street** | Add New Facilities |
| **Alameda Street at 74th Street** | Upgrade Facilities |
| **Alameda Street at Manchester Avenue** | Upgrade Facilities |
| **Santa Fe Avenue at Florence Avenue** | Upgrade Facilities |
| **Santa Fe Avenue at California Street** | Add New Facilities |
| **Santa Fe Avenue at Hope Street/Walnut Terrace** | Upgrade Facilities |

### 5.4.3 Bicycle

Bikeways are generally divided into four types described in Figure 5-3 (Bicycle Facility Types).

**Figure 5-3: Bicycle Facility Types**

**Class I (Bike Path)**




Provides a completely separated right-of-way (off-street) designated for the exclusive use of bicycles and pedestrians with crossflow traffic minimized.

**Class III (Bike Route)**



Provides for shared use with pedestrians or motor vehicles and is (on-street) designated by signs or permanent markings.

**Class II (Bike Lane)**



Provides a restricted right-of-way (on-street) designated for the exclusive or semi-exclusive use of bicycles. Pedestrian and motorist through travel is prohibited, although crossflows are permitted. Parking can be allowed to the right of bike lane if sufficient ROW width exists.

**Class IV (Cycle Track)**



Provides physical separation from motor traffic using a vertical feature, designated for the exclusive use of bicycles. The separation may include grade separation, flexible posts, inflexible barriers, or on-street parking.

The bicycle infrastructure that currently exists in the Specific Plan Area is limited to Class III bicycle routes and bicycle boulevards, and Class II bicycle lanes. There are Class III facilities on the following corridors:

- 92nd Street from Central Avenue to Alameda Avenue
- Hooper Avenue from Firestone Boulevard to Central Avenue
- Crockett Boulevard from 76th Place to Nadeau Street
- Maie Avenue from Slauson Avenue to 92nd Street (the Maie Avenue facility is designated as a bicycle boulevard)

There are Class II bicycle lanes on the following corridors:

- Hooper Avenue from Slauson Avenue to Firestone Boulevard
- Holmes Avenue from Slauson Avenue to Florence Boulevard
- Crockett Boulevard from Nadeau Street to 83rd Street

While existing facilities are limited, many additional facilities are proposed in the Specific Plan Area. More detail regarding these existing and planned facilities can be found in the Mobility & Equity Study.

### A. Bicycle Facility Improvements

In addition to what is already planned in the Bicycle Master Plan this Specific Plan proposes adding Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street. See Figure 5-4 (Recommended Bicycle Improvements) and Table Table 5-2 (Location and Type of Recommended Bicycle Improvements). In addition to bicycle facilities, bicycle parking should be provided at key public locations to serve existing uses. Bicycle parking can include bicycle racks, lockers, and corrals.



Example of a Metro Bikeshare Station

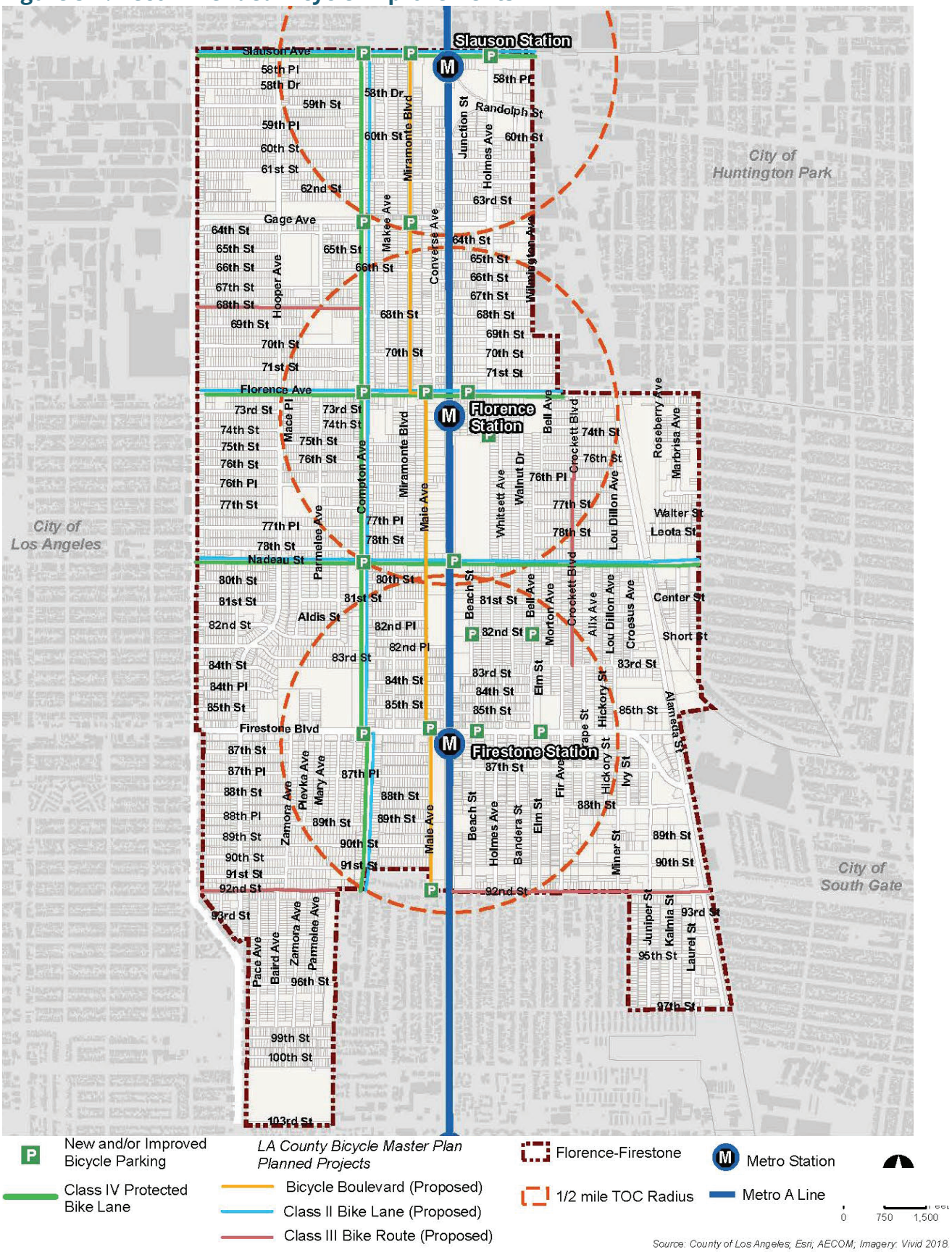
### B. Bikeshare

Bikeshare can play a major role in the success of transit-oriented development across urban communities as it increases travel possibilities, encourages public transit connections, and provides opportunities for recreation. Metro is anticipating additional efforts to install bicycle/mobility hubs around each of the station areas. The County should coordinate with the Metro Mobility Hubs team to site bikeshare stations at Metro stations and along commercial corridors throughout the Florence-Firestone community. Where possible, electric bicycles (e-bikes) should be incorporated into the bikeshare system, which will make the system more accessible to people of varying levels of confidence and fitness.

## Table 5-2: Location and Type of Recommended Bicycle Improvements

| Location | Improvement |
|---|---|
| **Compton Avenue** | Class IV Protected Bike Lane |
| **Florence Avenue** | Class IV Protected Bike Lane |
| **Nadeau Street** | Class IV Protected Bike Lane |
| **Slauson Avenue** | Class II Bike Lane (Bicycle Master Plan) |
| **Compton Avenue** | Class II Bike Lane (Bicycle Master Plan) |
| **Florence Avenue** | Class II Bike Lane (Bicycle Master Plan) |
| **Nadeau Street** | Class II Bike Lane (Bicycle Master Plan) |
| **68th Street (Central Avenue to Compton Avenue)** | Class III Bike Lane (Bicycle Master Plan) |
| **Crockett Boulevard (76th Place to 83rd Place)** | Class III Bike Lane (Bicycle Master Plan) |
| **92nd Street** | Class III Bike Lane (Bicycle Master Plan) |
| **Miramonte Boulevard (Slauson Avenue to Florence Avenue)** | Bicycle Boulevard (Bicycle Master Plan) |
| **Maie Avenue (Florence Avenue to 92nd Street)** | Bicycle Boulevard (Bicycle Master Plan) |
| **82nd Street & Beach Street** | Bicycle Parking |
| **82nd Street & Bell Avenue** | Bicycle Parking |
| **Slauson Avenue & Compton Avenue** | Bicycle Parking |
| **Slauson Avenue & Miramonte Boulevard** | Bicycle Parking |
| **Slauson Avenue & Holmes Avenue** | Bicycle Parking |
| **Gage Avenue & Compton Avenue** | Bicycle Parking |
| **Gage Avenue & Miramonte Boulevard** | Bicycle Parking |
| **Florence Avenue & Compton Avenue** | Bicycle Parking |
| **Florence Avenue & Maie Avenue** | Bicycle Parking |
| **Florence Avenue & Beach Street** | Bicycle Parking |
| **Beach Street & Holmes Avenue** | Bicycle Parking |
| **Nadeau Street & Compton Avenue** | Bicycle Parking |
| **Nadeau Street & Graham Avenue** | Bicycle Parking |
| **Firestone Boulevard & Compton Avenue** | Bicycle Parking |
| **Firestone Boulevard & Maie Avenue** | Bicycle Parking |
| **Firestone Boulevard & Beach Street** | Bicycle Parking |
| **Firestone Boulevard & Elm Street** | Bicycle Parking |
| **92nd Street & Maie Avenue** | Bicycle Parking |

## Figure 5-4: Recommended Bicycle Improvements



## 5.5 Complete Street Strategies

"Complete Streets" refers to the idea that streets should be usable and comfortable for people traveling by all modes, not only vehicles. Although the roadway system provides the backbone circulation system for all modes of transportation, it has historically been oriented to serving the automobile as the prioritized mode. Complete streets build upon the existing roadway system to provide a network that better supports safe and efficient circulation of transit, bicycles, and pedestrians, as well as automobiles. The existing street system will be maintained in its current configuration, with some changes designed to improve walkability, transit use, and bicycle use, as described in this Chapter, and in prior chapters of this Specific Plan. The number of traffic lanes and roadway lane configurations will generally remain the same. The following complementary complete streets strategy recommendations that apply to all modes include:

- Signage and wayfinding to provide improved information on distances and directions to people using any mode of travel
- Traffic calming to reduce dangerous speeds and improve safety for all roadway users
- Transportation Demand Management (TDM) program to manage demand for travel rather than increasing supply or capacity of transportation systems

### 5.5.1 Signage and Wayfinding

Through the Public Works project, installation of new signage and wayfinding is anticipated in the Specific Plan Area in the near future (locations shown in Figure 5-1). To support future travel needs and a higher number of people walking, biking, and riding public transit in the community, this strategy should be revisited periodically to assess whether existing signage is sufficient to meet the needs of all users, including pedestrians (who may prefer time estimates to destinations instead of distance estimates), bicyclists (who may prefer signs with directions to continue on designated bike facilities), and public transit riders (who may also seek information about transit transfer opportunities).

### 5.5.2 Traffic Calming

Traffic calming measures, such as curb extensions, speed bumps, raised crosswalks, and neighborhood traffic circles help slow the speed of traffic, improve the pedestrian environment, and minimize safety concerns associated with cut-through traffic. Figure 5-5 (Recommended Traffic Calming Improvements) shows several specific locations that are well-suited for traffic calming measures feasibility studies based on their existing width; local roadway designation; and, in some cases, direct requests from residents in the Florence-Firestone community. These locations include:

- 65th Street between Parmelee Avenue & Compton Avenue
- 68th Street between Parmelee Avenue & Compton Avenue
- 75th Street between Compton Avenue and Miramonte Boulevard
- 76th Street
- 77th Street between Compton Avenue and Miramonte Boulevard

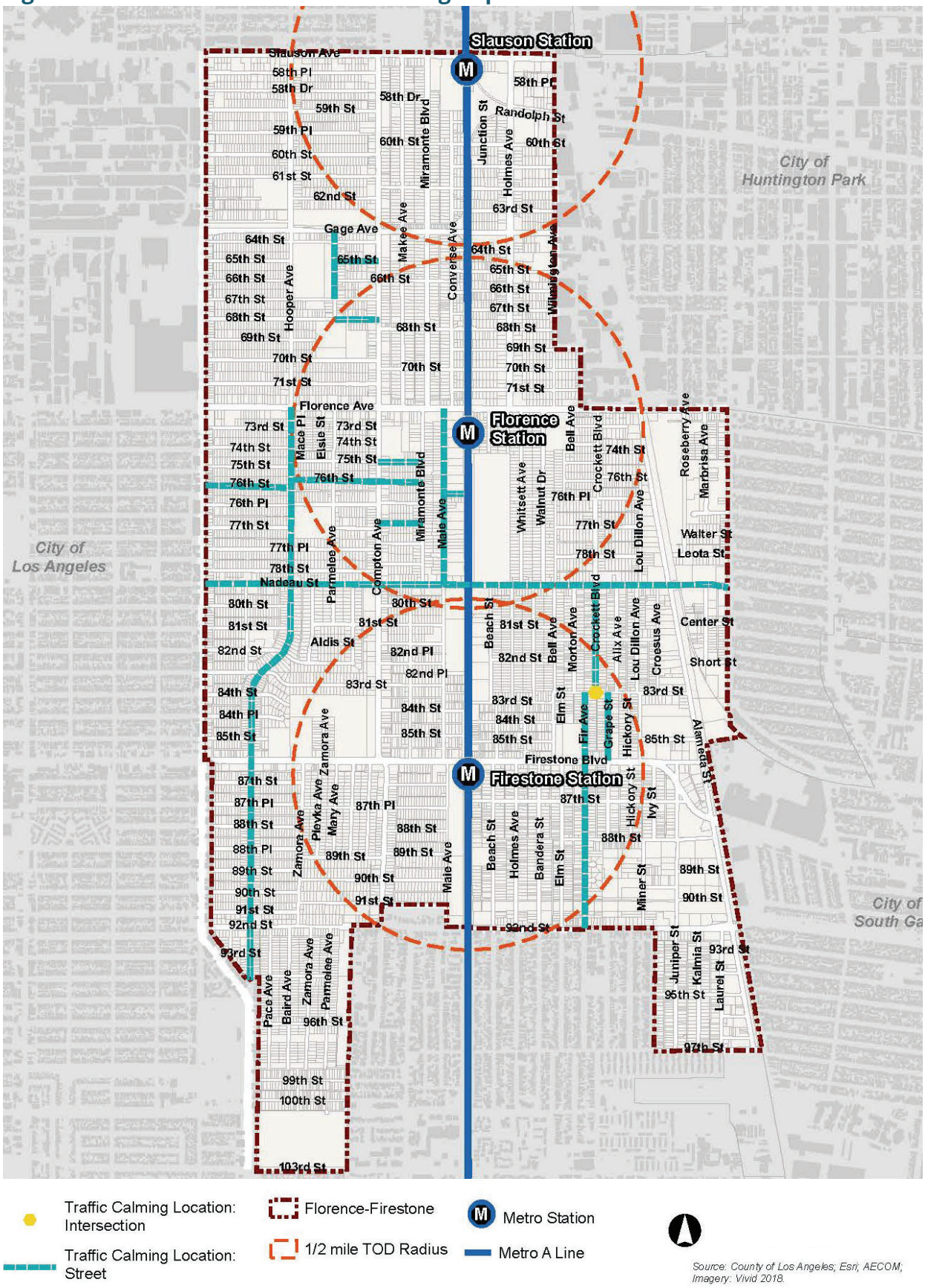
- 83rd Street & Crockett Boulevard
- Crockett Boulevard south of Nadeau Street
- Fir Avenue south of 83rd Street
- Grape Street between 83rd Street and Firestone Boulevard
- Maie Avenue north of Nadeau Street
- Nadeau Street
- Parmelee Avenue between Gage Avenue and 67th Street
- Hooper Avenue south of Florence Avenue

Further analysis and a feasibility study will be needed to determine the traffic calming approach most appropriate at each of these locations, and should consider feasibility, current design standards, and any additional information (speed surveys, updated collision history) that may become available.

In addition to these specific locations, the County can consider the following strategies to increase the number of local streets and neighborhoods that benefit from traffic calming:

1. Standardize the implementation of elements such as curb extensions whenever curb repair work, crosswalk improvements, or signal upgrades are completed, as context permits
2. Simplify and promote the process for a neighborhood to request speed bumps
3. Expand the application of “pilot” improvements using materials that are lower-cost, easier to install and remove, and can be deployed more rapidly when requested by residents.

## Figure 5-5: Recommended Traffic Calming Improvements



### 5.5.3 Transportation Demand Management Program

Transportation Demand Management (TDM) describes the programmatic incentives that are used to manage demand for travel (in contrast to strategies that increase supply or capacity of transportation systems). A Florence-Firestone TDM program could be implemented through a community-scale Transportation Management Organization (TMO) that provides resources, information, and incentives to employers, employees, and residents in the community. The TMO may be housed within a County department or may be a separate entity – both examples exist within other LA County jurisdictions. The TDM program could encourage employers to provide transit passes, active transportation incentives, and remote work options for their employees, and could serve as a "one-stop-shop" for information about traveling in Florence-Firestone, for residents, visitors, and employees. The TMO could also serve as a resource to implement parking management strategies.

While not a requirement to launch a TDM program, the elements below could strengthen the program's effectiveness and incentivize the use of existing transit resources and active transportation investments:

- Identification of a dedicated revenue stream to fund incentives and staff the TMO, whether internal to a County department or as a separate entity
- Mandatory participation for large employers to ensure the largest commercial developments are communicating with their employees about travel options (as noted in a previous chapter, employers that employ over 250 people at a worksite may have an Employee Commute Reduction Program (ECRP) as a way to meet their emissions reductions targets specified by AQMD Rule 2202)
- A reporting requirement to track impact over time, including participation, travel trends, and dollars spent on incentives that return to residents within the community

## 5.6 Additional Major Project Recommendations

In addition to the described network improvements, three major improvements have been identified to improve access to the Metro A Line Stations in the Specific Plan Area and to Roosevelt Park, with a focus on pedestrian accessibility. These projects have been identified in prior planning efforts such as the Metro Blue Line First/Last Mile Plan and the FFCP. These efforts would require coordination across multiple agencies and/or land acquisition and may be most feasible to complete with redevelopment of adjacent parcels near the project locations. These project locations are shown in Figure 5-6 (Additional Major Project Recommendations)

### 5.6.1 Southern Slauson Station Access Point

Formalizing the informal pedestrian pathway leading from 60th Street to Slauson Avenue will connect the neighborhoods south of the Slauson Station to the station entrance. This pathway is already used as an informal access point to the station and provides a more direct path of travel to the station entrance. Formalizing the path will require acquisition of the rail right-of-way underneath the Metro A (Blue) Line, coordination with Metro, and coordination with the Public Works.

### 5.6.2 Pedestrian Bridge at 76th Street

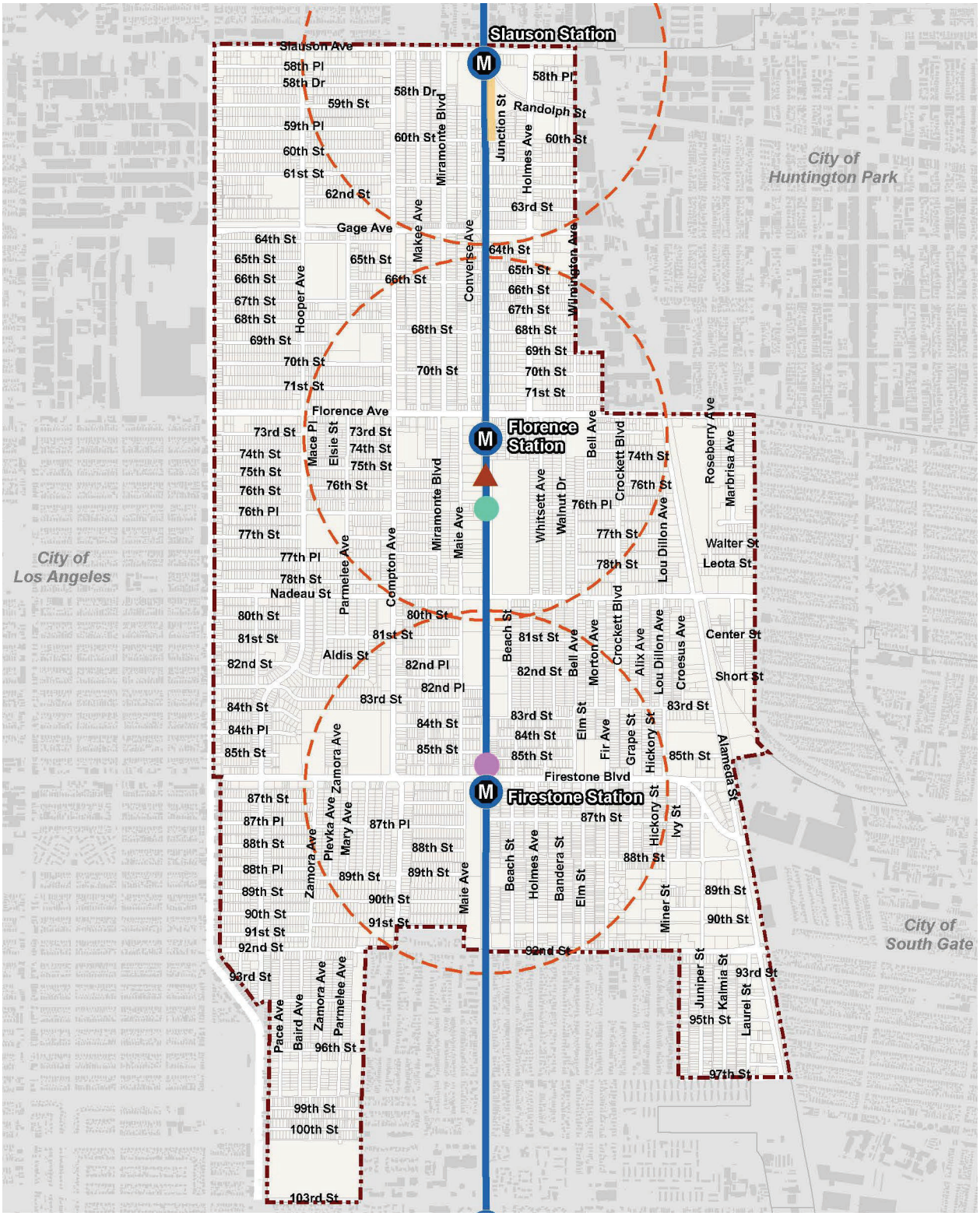
Replacement and reconstruction of the pedestrian bridge connecting the west side of the community at East 76$^{th}$ Street to Roosevelt Park at Graham Avenue would improve neighborhood pedestrian connectivity, access to community assets, and access to transit. In addition, by incorporating public art, the reconstruction of this bridge would create a pleasing visual marker for the community, reinforcing locally valued viewsheds at the top of the bridge.

### 5.6.3 Florence Station and Firestone Station Access

Increasing the ease of reaching a transit station is an important improvement that should be made for each of the stations in the Specific Plan Area. The A (Blue) Line Stations in the Specific Plan Area each only have one access point. The Slauson Station will see expanded access as the West Santa Ana Branch line is implemented, but the Florence and Firestone Stations would also benefit from improved access. At the Florence Station, the community suggested creation of a second at-grade access point at the south end of the station to minimize out-of-direction travel to access the platform. At the Firestone Station, additional amenities under the elevated rail line would improve the pedestrian and transit rider experience. These amenities could include:

- Better lighting under the rail overcrossing, near the station entrance, and along the blocks adjacent to the station
- Beautification through murals, art, and landscaping
- Additional Metro communication and emergency call boxes
- Additional street furniture
- Additional wayfinding, signage, and branding extending under the overcrossing to the west side of the rail tracks

## Figure 5-6: Additional Major Project Recommendations




*Source: County of Los Angeles; Esri; AECOM; Imagery: Vivid 2018.*

## 5.7 Parking

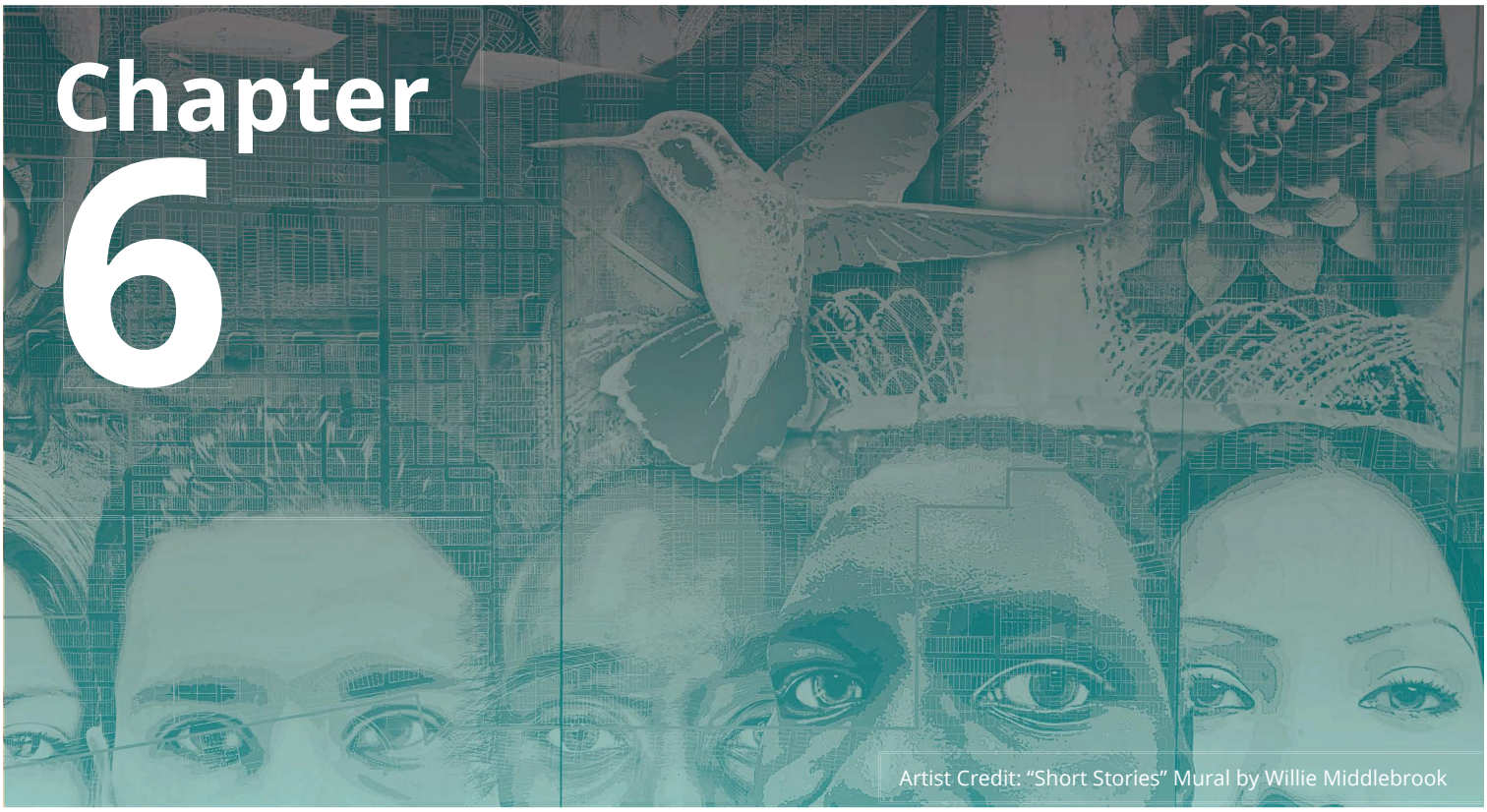
The overall goal for parking in the Florence-Firestone community is to provide sufficient parking to ensure the economic viability and success of the community, to provide parking in convenient locations to users, and to efficiently manage existing parking in a manner that supports a safe, walkable and pedestrian-friendly environment in the Specific Plan Area. The provision and management of parking within a TOD is closely tied to the success of transit and to creating a welcoming pedestrian and bicycle environment. Strategies for providing parking must complement the land use strategies and the availability of transit.

Typically, these strategies reduce requirements for parking near transit stations and charge for parking that is provided. However, the following factors are particular to the Florence-Firestone community:

- Older housing stock that may have fewer parking spaces per unit;
- A higher number of people per dwelling unit than the average for Los Angeles County; and
- Heightened concerns about the rising cost of living that may induce displacement in the community.

Based on these contextual factors and community input around perceived residential parking shortages, this Specific Plan reinforces the comprehensive parking study recommended by the FFCP as a near-term implementation action, with the following goals for the study:

- Document existing parking conditions;
- Identify opportunities for improving management of the public and private parking supply in order to alleviate existing parking deficiencies and improve access to parking resources;
- Explore creative strategies and techniques to manage the existing parking supply as growth occurs in the area; and
- Identify options for reducing parking requirements for new development in and near the Metro A (Blue) Line Stations.



Chapter 6

Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Infrastructure

# 6 Infrastructure

## 6.1 Overview

This Chapter describes the utility infrastructure needed for implementation of the Specific Plan. It provides an overview of existing conditions for water, sewer, stormwater, electric, natural gas, and telecommunication services and provides recommendations for targeted improvements necessary to serve future conditions under the Specific Plan buildout.

As an already developed area, Florence-Firestone has the utility and public facilities coverage needed to serve the existing population and future development under the Specific Plan. However, increased development may require that certain utilities be expanded or upgraded at time of development for key locations to accommodate growth.

## 6.2 Water Service

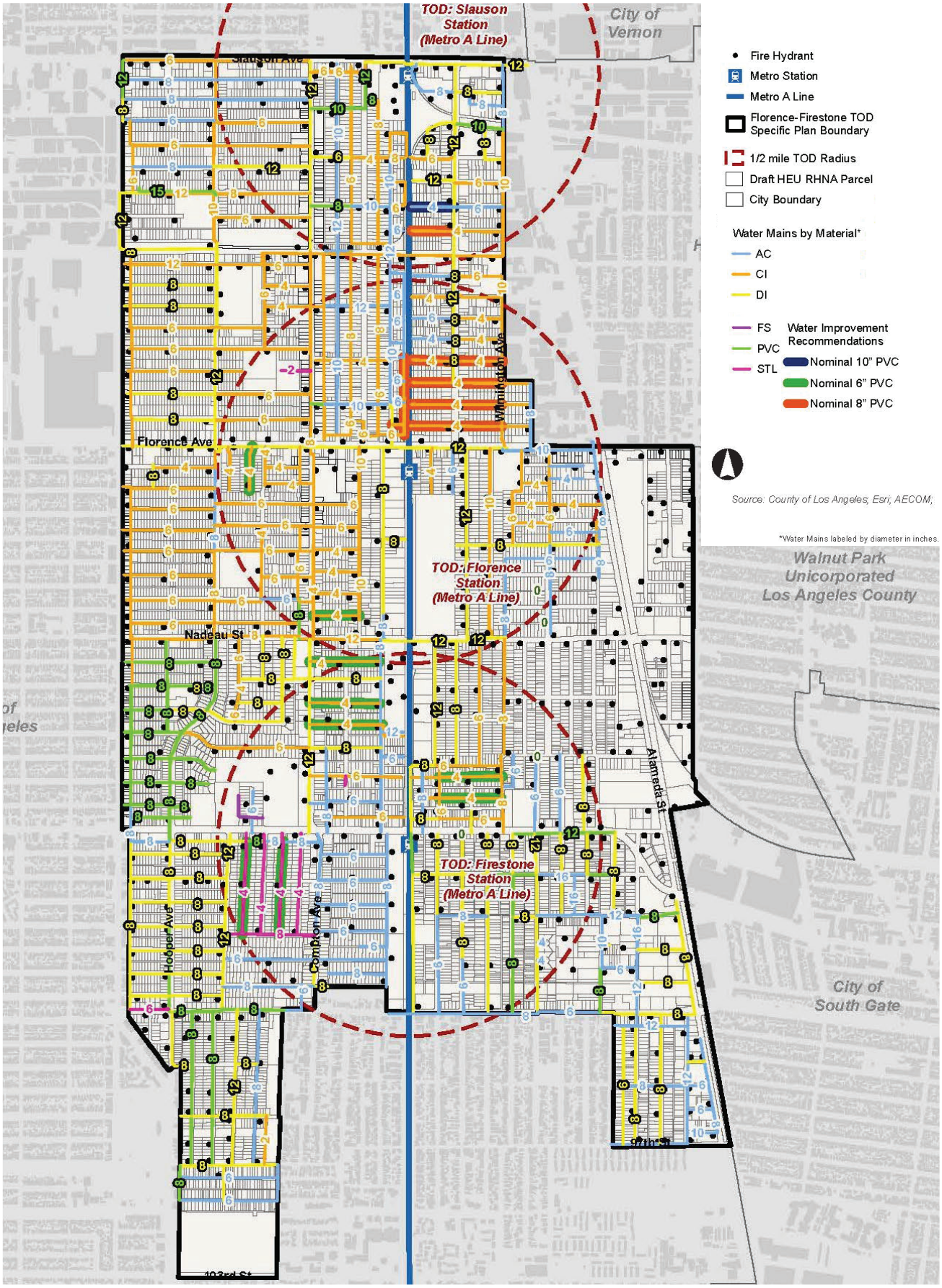
### A. Existing Conditions

The Specific Plan Area and Florence-Graham Water System customers are serviced with potable water by the Golden State Water Company. This water is a blend of groundwater pumped from the Central Groundwater Basin and water from the Colorado River Aqueduct and the State Water Project, which is imported and distributed by the Metropolitan Water District of Southern California (MWD). According to the Florence-Graham Water System Consumer Confidence Report on Water Quality for 2019, the "Central Groundwater Basin is bounded on the north by the La Brea Uplift; on the east by the Elysian, Repetto, Merced and Puente hills; on the southeast by the Orange County Groundwater Basin; and on the west by the Newport-Inglewood Fault Zone."

The installed water system is constructed of mostly cast iron, ductile iron, and asbestos concrete with sizes ranging from 2 inch to 16 inch pipes. Pipes are located in the public right-of-way under existing streets and alleyways. Figure 6-1 (Existing and Planned Water System) shows the layout of the existing water lines, along with recommended upgrades that are necessary to meet the projected demand within the Specific Plan.

Currently, there are no existing recycled water pipelines are installed in the Specific Plan Area. If installed in the future recycled water systems would be owned and maintained by Central Basin Municipal Water District. The closest recycled water pipelines to the Specific Plan Area are approximately 1.16 miles east from Alameda Street on Slauson Avenue and 2.31 miles east of Alameda Street on Firestone Boulevard.

## Figure 6-1: Existing and Planned Water Systems



### B. **Future Conditions**

The buildout of the Specific Plan includes a projection of housing and employment in mixed use developments. This would result in an increase in water demand and water flow in the community. However, this anticipated increase could be partially offset by decreased demand due to the conversion of existing industrial uses to mixed use developments. With some exceptions, existing water lines have the capacity to handle the increased demand.

The following needs have been identified if increased density is developed at the following locations:

- All lines servicing fire hydrants: must be at least nominal 6 inch to supply minimum fire flow requirements, per Title 22 Section 20.16.060
- High density residential buildout (RSS zone) of five stories north of 62nd Street and 63rd Street west of Holmes Avenue: may require upgrade of the existing 4 inch cast iron (CI). Recommended replacing 4 inch main with 10 inch polyvinyl chloride (PVC) main along 62nd and 8 inch PVC main along 63rd.
- Medium density residential buildout (RM zone) east of Converse, south of 68th Street, west of Wilmington Avenue and north of Florence Avenue: may require upgrade of 4 inch CI along 69th Street, 70th Street, and 71st Street. Recommend replacing all 4 inch mains in this area with 8 inch PVC mains.

Developers of mixed use parcels, and medium density or higher density residential parcels that include several buildings serviced by one meter location will need to provide a water supply analysis to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, County Title 22 regulations, and the California Subdivision Map Act.

The Golden State Water Company Florence-Graham District Urban Water Management Plan was last updated in 2015 and should be consulted for all water system upgrade considerations.

## 6.3 Sewer Service

### A. **Existing Conditions**

The existing sewer system (mains and laterals) is within the Consolidated Sewer Maintenance District (CSMD), which is owned and maintained by the Public Works Sewer Maintenance Division (SMD). All mains and laterals empty into SMD-owned trunks. The County's trunk sewer lines are owned and maintained by the Sanitation District.

The following is a characterization of the existing gravity-fed sewer mains within the Specific Plan Area. See Figure 6-2 (Existing Sewer System and Potential Upgrade Areas) for detailed locations.

- Streets and alleys, with some exceptions, are primarily 8 inch vitrified clay pipe (VCP) and lined cement pipe (LCP).
- North of Florence Avenue, some pipes are 10 inch, 12 inch, and 15 inch CVP, collecting from large systems of 8 inch CVP to carry to larger diameter trunks.

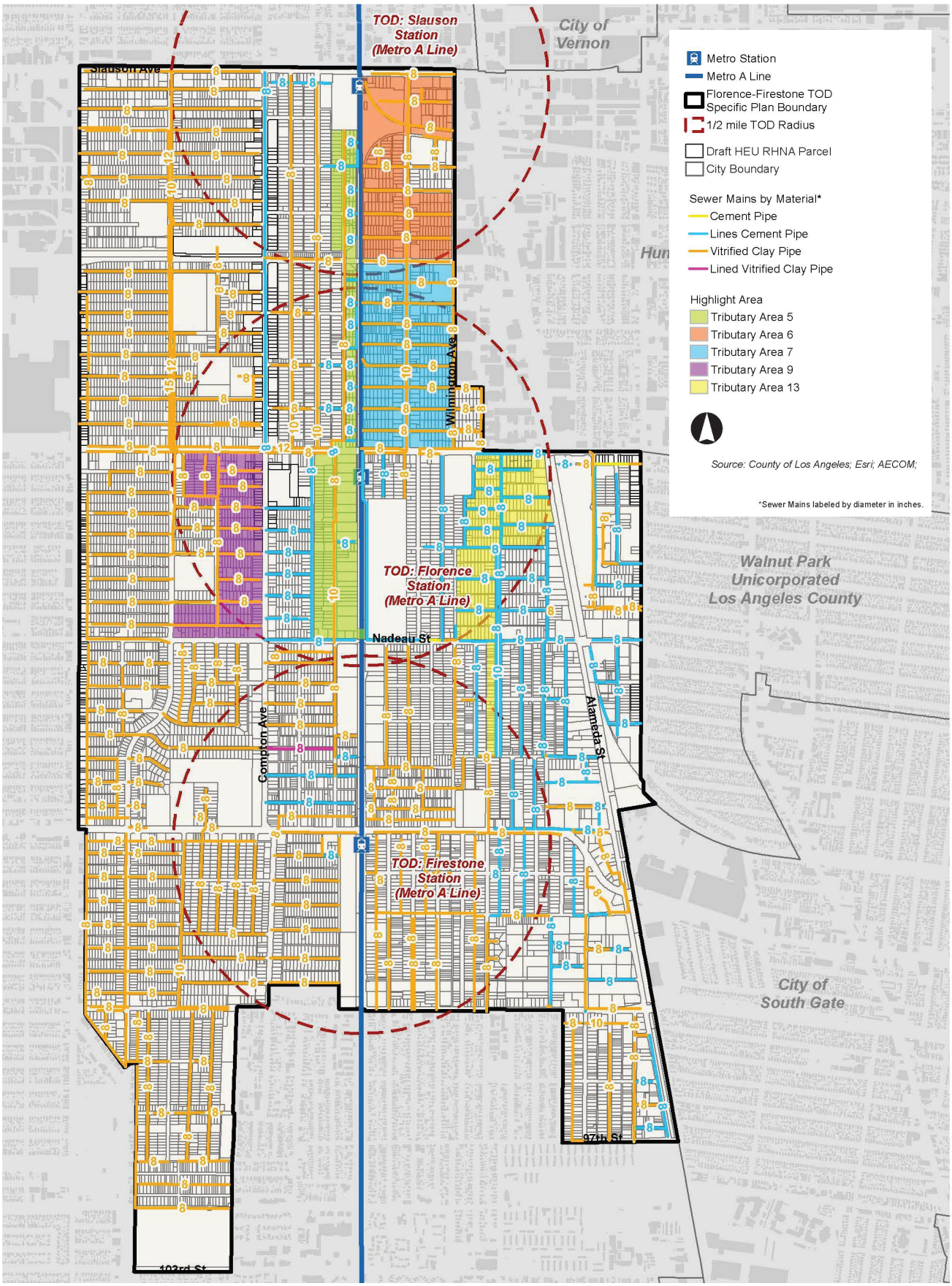
- The Hooper Avenue trunk starting at E Florence Avenue, runs south on Hooper Avenue to 92nd Street, Baird Avenue from 92nd Street and Zamora Avenue from 98th Street. This trunk continues under Ted Watkins Memorial Park and south of the Specific Plan Area.
- The Compton Avenue trunk, starts at E Florence Avenue, and follows Compton Avenue south of the Specific Plan Area.
- Two trunk lines starting at E Florence Avenue and Whitsett Avenue, flow south, crossing through the southeast portion of the Specific Plan Area and continues south.

### B. **Future Conditions**

A preliminary analysis was performed using available information that shows that the existing trunk sewers generally have sufficient capacity to support the buildout of the Specific Plan. The following locations are exceptions that may require upgrading based on the level of density/intensity realized in the vicinity:

- Tributary Area 5: A 10 inch main emptying into a trunk line at the Maie Avenue/Nadeau Street intersection may warrant further study. The main collects from 50 acres of light residential and light manufacturing uses on the east side of Converse Avenue and Maie Avenue, from north of E 60th Street to Nadeau Avenue. Depending on the density/intensity of uses between 60th Street and Nadeau Avenue, east of Converse Avenue and Maie Avenue, the main may need to be upgraded to 15 inch.
- Tributary Area 6: An 8 inch main running toward City of Huntington to the east at Slauson Avenue may warrant further study. The main collects from 49 acres that are zoned Unlimited Residence and Heavy Manufacturing, along Holmes Avenue, from Gage Street to Slauson Avenue, east to west from South Pacific railroad lines to Wilmington Avenue comprises the northeast corner of the Specific Plan Area and a majority of the Slauson TOD Area. This portion of the Specific Plan is planned for high intensity mixed use and medium density residential development, replacing existing industrial and primarily single-family uses, respectively. The 8 inch main may be insufficient for existing conditions due to the significant presence of heavy manufacturing in the area; upgrade to 10 inch is recommended. Depending on density/intensity of future development, the main may need to be upgraded to 15 inch.
- Tributary Area 7: A 10 inch main flowing south under Holmes Avenue from Gage Avenue to a Trunk line at Florence Avenue may warrant further study. The main runs between South Pacific railroad to the east and Wilmington Avenue to the west. The 10 inch main services 59 acres of mostly Unlimited Residence with some Light Manufacturing, Neighborhood Business, and Mixed-Use Development; this area is planned for low-medium (RLM-2) to medium density (RM) residential. Depending on density/intensity realized in the geography, the main may need to be upgraded to 15 inch.

## Figure 6-2: Existing Sewer System and Potential Upgrade Areas



- Tributary Area 9: An 8 inch main under Parmelee Avenue that flows to the west under E 78th Street and empties into a trunk under Hooper Avenue may warrant further study. The main services about 34 acres south of Florence Avenue, east of Parmelee Avenue and North of E 78th Street; this area is composed of Limited Density Multiple Residence, General Commerce, and Mixed-Use Development zones. Depending on density/intensity of the uses, the main may need to be upgraded to 10 inch.

Parcel developers need to consult with Public Works and the CSMD regarding future sewer facilities or upgrade considerations; the CSMD will evaluate all development that will occur and will conduct its own analysis of changes to the service trunk and necessary sewer infrastructure upgrades.

New sewer laterals will be required for new buildings. The cost of extending the sewer mains and laterals to serve the new buildings will be borne by the developers. Sewer mains run in the street and sewer laterals are the sewer pipes that connect to the building.

## 6.4 Stormwater Service

### A. Existing Storm Drainage Conditions

The stormwater in the Florence-Firestone urban area is managed by open channel flow in curbs and gutters as the primary conveyance. The storm drainage system is a combination of public and privately maintained channels, including the majority of segments that are maintained by Public Works within the Los Angeles County Flood Control District (LACFCD), a segment running along Nadeau Street east from Graham Avenue that is maintained by the Road Maintenance Division (RMD), and several drains in the area being maintained by private entities.

The entire system is gravity fed, reinforced concrete pipe (RCP) from 18 inch to 90 inch, mostly 24 inch to 48 inch in diameter. See Figure 6-3 (Stormwater System). Each branch empties into higher flow reinforced concrete boxes (RCBs) ranging 51 inch to 84 inch in height and 54 inch to 105 inch in width running under Hooper Avenue on the west side of the Specific Plan Area, and under Crockett Boulevard and Hickory Street on the east side, comprising the Hooper Avenue Drain and Glen Avenue Drain systems, respectively. Both drains empty into Compton Creek Upper before it empties into the Los Angeles River.

Stormwater flow is typically north to south in the Specific Plan Area. West of Graham Avenue, the flow is from east to west along Florence Avenue, Nadeau Street, and Firestone Boulevard. East of Graham Avenue, the flow is west to east along the same roads.

### B. Green Infrastructure / LID Requirement

Green infrastructure and low-impact development (LID) are practices that contribute to stormwater quality control. These practices lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving water, and other water bodies, and minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed stormwater features.

Public Works maintains two documents to guide and require these practices: the Low Impact Development (LID) Manual and the Green Infrastructure Guidelines; see these documents for specific details.

The LID Manual requires compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County. The Regional Water Quality Control Board (RWQCB) adopted the MS4 permit (order no. R4-2012-0175) in December 2012, establishing LID requirements for all new development projects in nine different categories. The majority of anticipated new development under the Specific Plan would qualify under these categories and be required to install LID features consistent with the LID Manual.

LID practices or stormwater quality control measures can be categorized into the following types:

1. Retention-based stormwater quality control measures (bioretention, infiltration basin, dry well, permeable pavement, etc.)
2. Biofiltration
3. Vegetation-based stormwater quality control measures (stormwater planter or planter box, vegetated swale, green roof, etc.)

The Green Infrastructure Guidelines provide guidance for new construction and reconstruction of road and flood projects. The goal of the Guidelines is to incorporate sustainable practices into the design, construction, and operation of Public Works' infrastructure. The Guidelines provide LID design options to consider during the planning or designing of road and flood projects intended to manage stormwater runoff.

All new development, administrative and discretionary, under the Specific Plan shall:

A. Demonstrate that site improvements do not introduce new flooding concerns upstream or downstream from the project;

B. Submit LID and/or Storm Water Pollution Prevention Plans, as required by the NPDES thresholds, to preservation of water quality and mitigation of environmental impacts; and

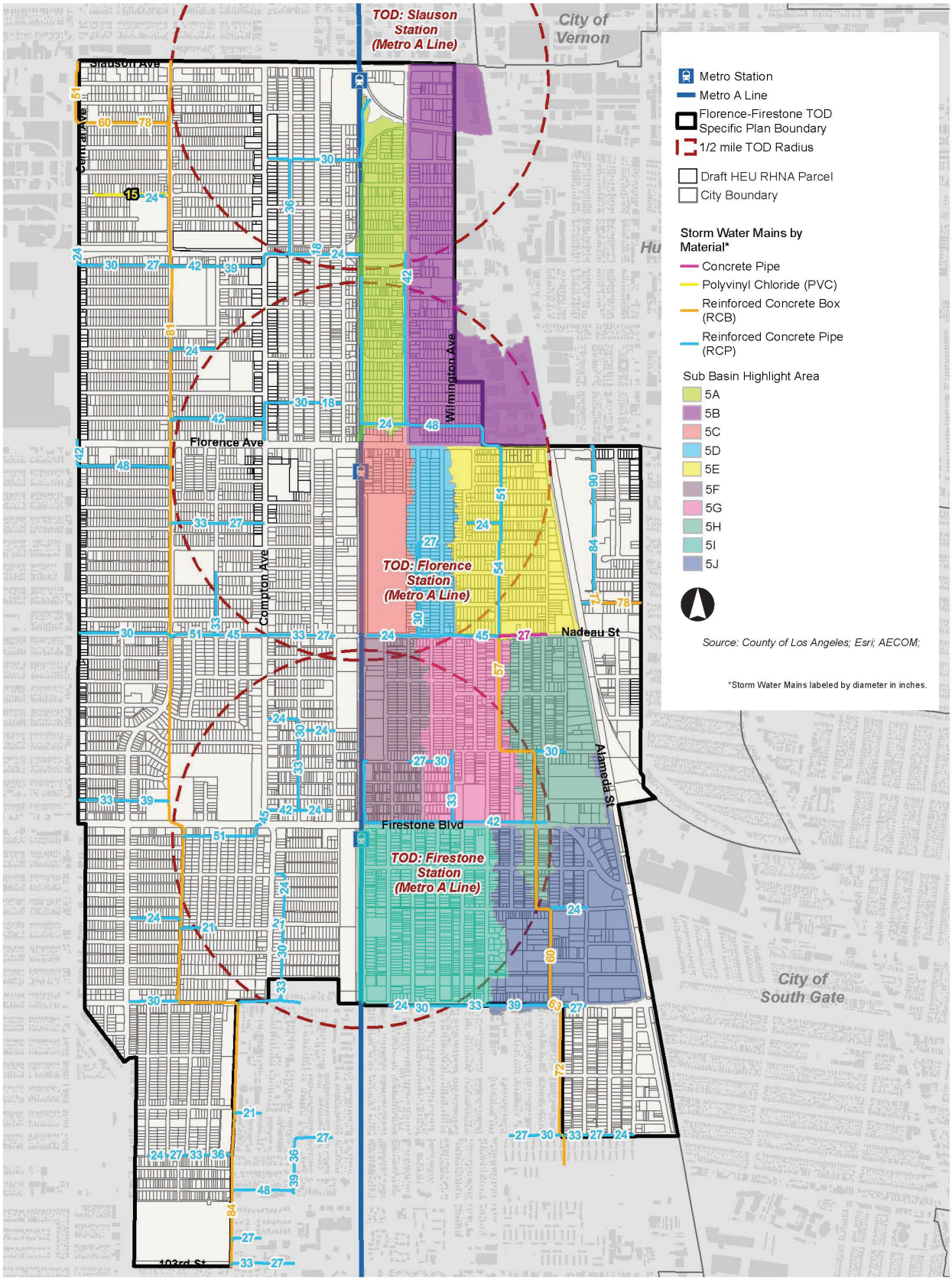
C. Incorporate best management practices, as appropriate to the project and parcel, consistent with the LID Manual and Green Infrastructure Guidelines.

### C. Future Stormwater Management Conditions

Buildout of the Specific Plan will generate little increase in runoff to the existing drainage system because the area is completely developed and projects will be required to incorporate LID practices per RWQCB requirements and Public Works' Green Infrastructure Guidelines. However, based on existing infrastructure within the two drain systems, existing and project infrastructure capacities differ.

The Hooper Avenue Drain, comprised of the underground drainage system west of the Southern Pacific railroad line, has adequate capacity to carry the peak flow of the 25-year storm inclusive of Specific Plan buildout. Upgrades are not required to meet buildout conditions.

## Figure 6-3: Stormwater System



The Glen Avenue Drain originates at 63rd Street and Gage Avenue. The Drain leaves the Specific Plan Area heading south under Croesus Avenue and carries the runoff from the entire eastern half of the Specific Plan Area. Preliminary study results show this 72x72 RCB has insufficient capacity to carry the peak flow runoff generated by the 25-year storm.

Each highlighted area in Figure 6-3 (Stormwater System) represents basins served by the Glen Avenue Drain that may experience underground drainage system overflows due to deficient underground flow capacity, with associated stress placed on curb and gutter drainage to carry the excess. Developments generated by this Specific Plan should not add to these conditions. However, it is recommended that the areas served by the Glen Avenue Drain improve area runoff peak flow characteristics through generalized implementation of retention-based stormwater quality control measures within the public right-of-way and in any new developments. If possible, upsizing of segments of the underground system to handle 50 percent greater flow is also recommended.

## 6.5 Solid Waste Management

The Specific Plan Area utilizes the residential/commercial franchise system for solid waste collection services. The County administers trash, recycling, green waste collection, and other waste management services within the Florence / Firestone / Willowbrook Garbage Disposal District. Services are currently provided to residents and businesses through a contract with Consolidate Disposal Services, a private waste hauler.

Waste management is an increasingly challenging issue for urbanized areas as available space for landfills becomes more limited and increasing populations generate more waste. In 2014, the Board of Supervisors adopted a Roadmap to a Sustainable Waste Management Future. This roadmap outlines the process by which the County can implement strategies to reduce solid waste generation in unincorporated areas and through County operations. The Florence-Firestone community is part of this program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040.

## 6.6 Electrical Service

Electricity in the community is provided by Southern California Edison (SCE), a private franchise utility company and subsidiary of Sempra Energy.

All standards, development requirements, and improvement strategies are set directly by SCE, with oversight by the California Public Utilities Commission (CPUC). Electricity is transmitted by a network of mostly aboveground power lines, with a few underground distribution facilities to supply sufficient power to all locations, including streetlights and traffic signals. The major east-west arteries like Slauson Avenue, Firestone Boulevard, and Florence Avenue are mostly free of overhead lines; lines serving these areas run through nearby alleyways. However, areas free of full overhead power lines have individual lines connecting to and powering streetlights and are crossed by overhead lines on crossing roads and alleys.

The existing system supplies a sufficient level of electrical service to the Specific Plan Area and has adequate capacity to support the buildout of the Specific Plan.

New development or redevelopments will be responsible for upgrades and undergrounding as determined by SCE, in coordination with Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and CPUC will determine the overhead sections that will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Public Works will determine streetlight and traffic signal modifications for new and redevelopments, in accordance with County Title 22 requirements.

CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated areas in counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." See Figure 6-4 (Proposed Rule 20A Utility Undergrounding Districts). The following are "Public Interest" criteria:

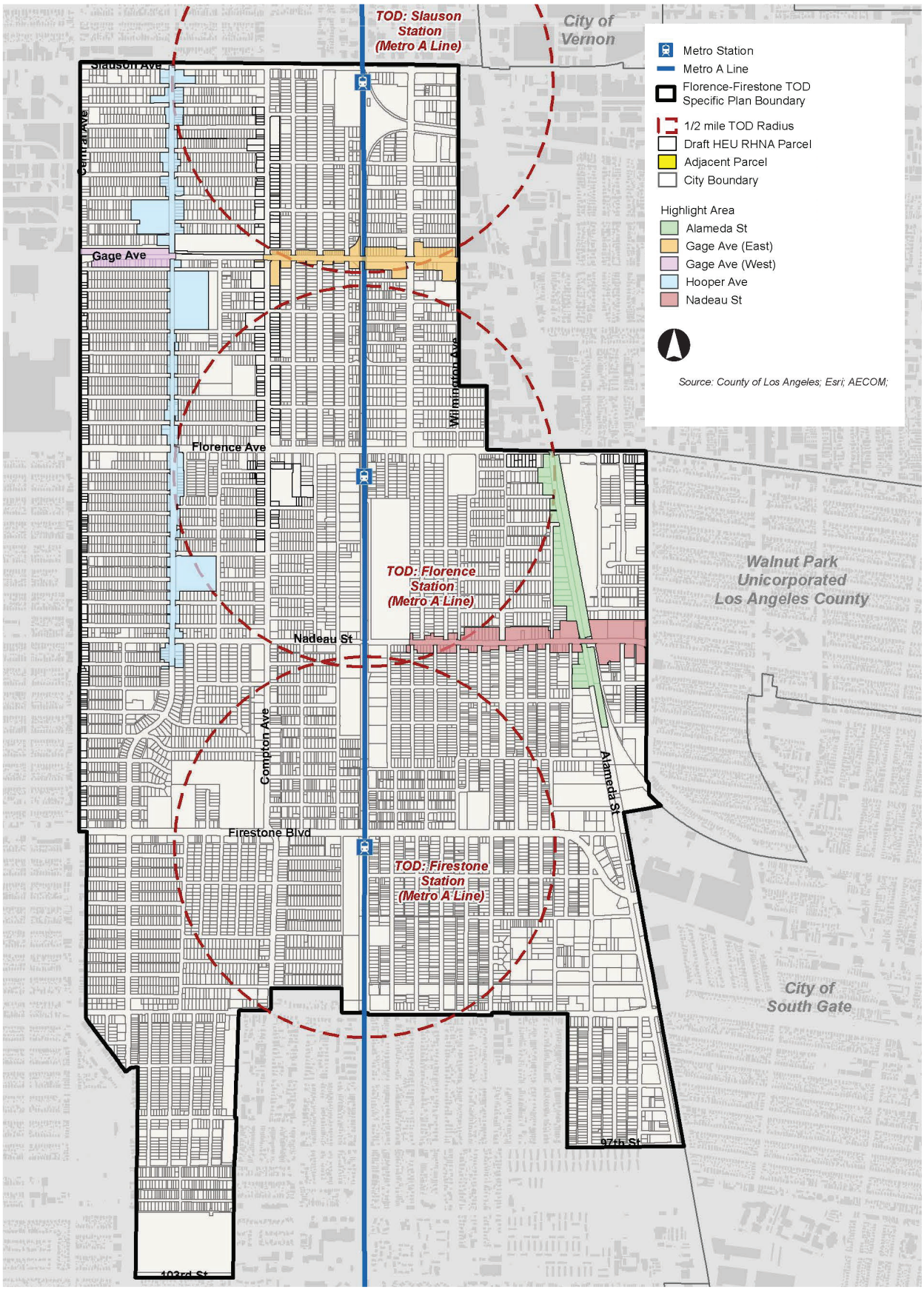
- Eliminate an unusually heavy concentration of overhead lines;
- Involve a street or road with a high volume of public traffic;
- Benefit a civic or public recreation area or area of unusual scenic interest; and
- Be listed as an arterial street or major collector as defined by the Governor's Office of Planning and Research (OPR) Guidelines.

Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible five year "borrow forward" if required), and the creation of a utility underground district.

The following areas should be considered for a Rule 20A undergrounding process:

- Gage Avenue: Strip mall development between Hooper Avenue and Compton Avenue resulted in the removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit.
- Alameda Street: Entire length of major collector north of 92nd Street has overhead lines; Alameda Street serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit.
- Hooper Avenue: Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the Specific Plan Area.
- Nadeau Street: There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the Specific Plan Area.

## Figure 6-4: Proposed Rule 20A Utility Undergrounding Districts



## 6.7 Natural Gas Service

Southern California Gas Company (SCG) is a private franchise utility company regulated by the CPUC that provides natural gas to the Specific Plan Area. SCG owns and operates all transmission mains, distribution pipelines, and service laterals in the community.

See Figure 6-5 (Natural Gas System) for an overview of existing facilities.

The analysis and decision on capacity to meet future demand under buildout of the Specific Plan will be conducted by SCG in coordination with the County at the time building plans are submitted and development occurs. The development shall be responsible for the cost of required upgrades and new or relocated services for new development or redevelopments.

## 6.8 Telecommunication & Cable Service

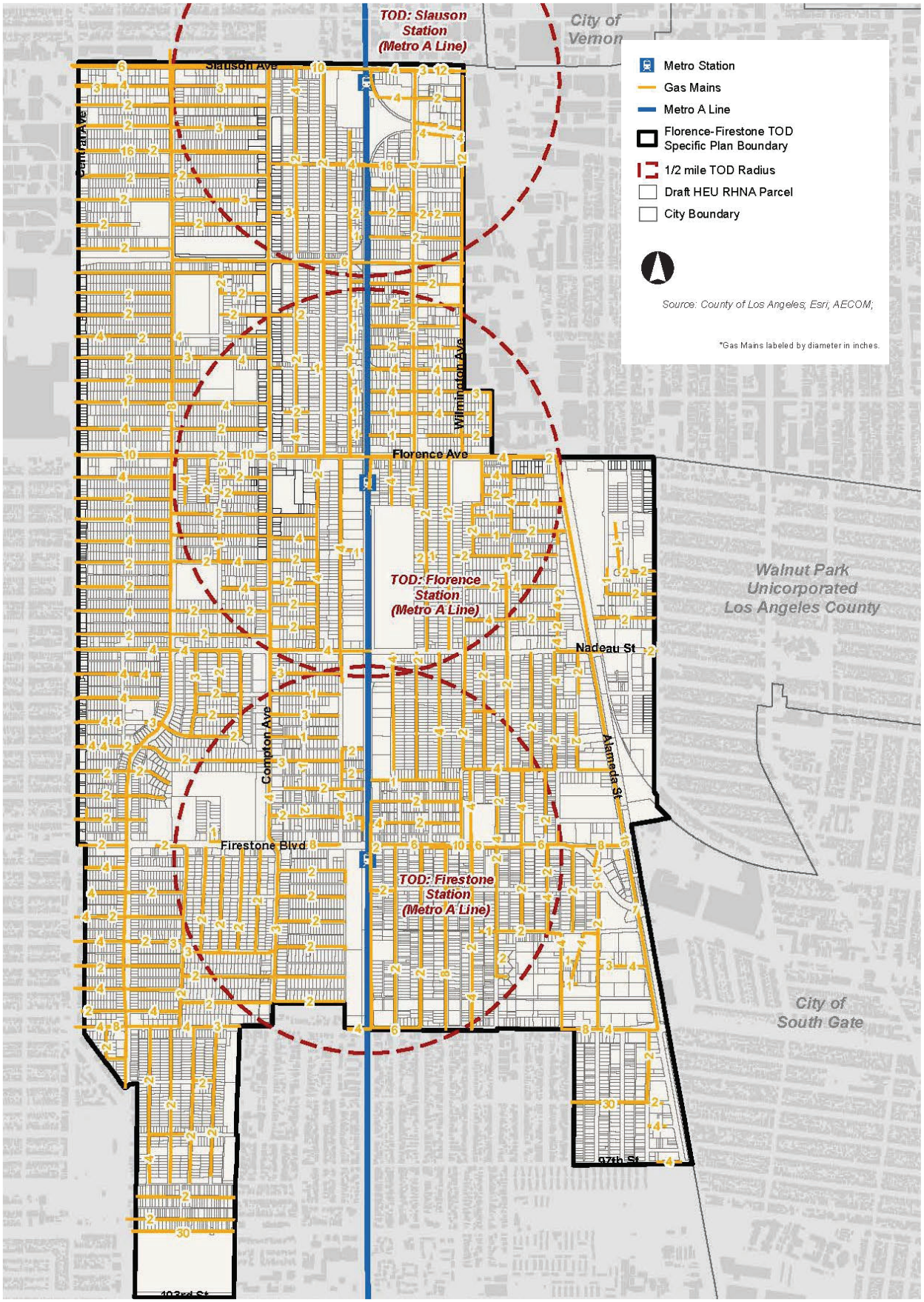
AT&T, a private franchise utility company, provides local and long-distance telecommunication services and ADSL (or Asymmetric Digital Subscriber Line) internet services in the Specific Plan Area. Services are provided primarily on aboveground lines shared with the electric provider. There are no fiber optic installations in the Specific Plan Area.

AT&T assesses demand for services and ability to serve new developments on a case-by-case basis after building plans are submitted by developers. AT&T provides any assessed upgrades or new services and recoups the cost later with the additional revenue from new customers.

Spectrum provides cable and internet services, with copper cable connections provided to every parcel, in the Specific Plan Area. Spectrum shares joint trenches with electrical and AT&T if the electrical lines are undergrounded. SCE determines the layout of underground conduit facilities, which AT&T and Spectrum utilize.

Various wireless carriers provide services within the Specific Plan Area. Wireless communications facilities, either freestanding or attached to a building or structure, currently require approval of a Conditional Use Permit in compliance with  Title 22 . Conditional Use Permits for wireless communications facilities shall expire 10 years from the date of approval, unless amended or extended by the planning commission or hearing officer. The County is working on an update to the wireless ordinance that may alter the standards or approval requirements for wireless communication facilities

## Figure 6-5: Natural Gas System





Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Implementation

# 7 Implementation

## 7.1 Funding and Financing Strategies

This section provides an overview of a variety of potential funding sources and financing measures that may help the County implement certain improvements and upgrades to support the FFCP vision and policies and the Specific Plan objectives.

While some implementation actions can occur incrementally, other actions occur with specific development projects, and others will require funding from a variety of sources.

Potential funding sources are grouped into the following categories:

1. Land-secured financing
2. Development and private sources
3. County Programs, Funds, and Measures
4. Regional, state, and federal programs

Each potential funding source that may apply to the Specific Plan Area is identified with a brief description and associated with types of projects that the source can fund in Table 7-1 (Specific Plan Implementation Financing Strategies). See Appendix A for a more in-depth description of each funding and financing tool and its relation to improvements and projects as part of the Specific Plan. Improvement and project types includes in Table 7-1 are those that help to achieve the FFCP vision, policies, and objectives, summarized below:

- Streetscape/public realm/infrastructure refers to improvements to multi-modal infrastructure encompassing walking, cycling, public transit, and automobiles to make it safer and more comfortable to access destinations and connect to other transportation infrastructure.
- Public art refers to investments in art across media created for the general public, and which enhances cultural resources and community identity.
- Affordable housing refers to investments in new housing options which expand the supply of rental and for-sale units that are privately owned and subsidized by the government to offer reduced prices for low-income households.
- Equity-based programs refer to investments that center equitable outcomes, including those specifically targeted towards low- and moderate-income neighborhoods and disadvantaged communities most impacted by pollution, aging infrastructure, and a lack of affordable housing.

Table 7-1 provides a toolkit of diverse sources relevant to the Specific Plan and is intended to provide a starting point for developing a funding strategy for community investment.

Funding programs are subject to change; the programs listed in this section are relevant as of the time of Specific Plan adoption. As noted in Appendix A, grant applications for projects in the Specific Plan may be more successful if "bundled" with similar projects in other parts of Los Angeles County.

As funding opportunities are realized and new funding becomes available, the County can continue to identify, monitor, and apply for other governmental funding sources that meet the County's and respective agencies' objectives over time.

### 7.1.1 Land-Secured Financing

Land-secured financing tools in California include the formation of benefit assessment districts, business-based or property-based business improvement districts, community facilities districts (CFDs), and others described herein.

A. Community Benefit Assessment Districts. A Benefit Assessment District is a financing mechanism, funded through charges on properties in the district, used by jurisdictions to help pay for specific services in a defined district area.

B. Community Facilities Districts (Mello-Roos). Mello-Roos financing is a discretionary financing mechanism that applies to real property owners within a Mello-Roos District, which is also known as a Community Facilities District (CFD).

C. Community Revitalization and Investment Authorities (CRIA). A CRIA is a financing tool, authorized through AB 2 (2015) that can be used to fund projects for affordable housing and economic revitalization in disadvantaged communities.

   The entirety of the FFTOD Specific Plan Area is designated as a Disadvantaged Community (DAC) per SB 535 (De León) and thus meets the criteria for the creation of a CRIA.

D. Enhanced Infrastructure Financing District (EIFD). EIFD is a financing tool that, like CRIA, is based on establishing a district area and collecting a portion of property tax increment to fund qualifying projects, either directly or through bond issues serviced by the tax increment.

E. Neighborhood Infill Finance and Transit Improvements Acts (NIFTI and NIFTI-2). The NIFTI Act (2017) is an enhancement of EIFD law that allows an EIFD that is coterminous with the city or county establishing the entity to employ sales and use taxes to fund projects in infill site areas. In addition, 20 percent of all funds generated through NIFTI must be set aside for affordable housing.

F. Business-Based Improvement District (BBID)/Property-Based Business Improvement District (PBID). A BBID is a public/private partnership formed through assessments on businesses within the district, and a property-based business improvement district (PBID) is formed through assessments of property owners alone.

**Table 7-1: Specific Plan Implementation Financing Strategies**

| Funding Source | Streetscape / Public Realm/ Infrastructure | Public Art | Affordable Housing | Equity-Based Programs |
|---|---|---|---|---|
| **Category: Land-Secured Financing** | | | | |
| Community Benefit Assessment Districts / Community Facilities Districts (Mello-Roos) | X | | | |
| Community Revitalization and Investment Authorities (CRIA) | X | | X | X |
| Enhanced Infrastructure Financing Districts (EIFDs) | X | | X | |

| Funding Source | Streetscape / Public Realm/ Infrastructure | Public Art | Affordable Housing | Equity-Based Programs |
|---|---|---|---|---|
| Neighborhood Infill Finance and Transit Improvements Acts (NIFTI, NIFTI-2) | X | | X | |
| Business-Based Improvement Districts (BBIDs) / Property-Based Business Improvement District (PBID) | X | X | | X |
| **Category: Development and Private Sources** | | | | |
| Development Impact Fees (DIFs) | X | X | X | X |
| Development Agreement (DA) and Disposition and DA (DDA) | X | X | X | X |
| **Category: County Programs, Funds, and Measures** | | | | |
| Capital Improvement Program (CIP) | X | X | X | X |
| Revenue Bonds | X | X | X | X |
| General Obligation Bonds and Other Public Debt | X | X | X | X |
| Multi-Family Housing Bonds | | | X | |
| Metro and Transportation Development Act Funds (TDA) | X | X | X | |
| Measure R / M | X | X | X | X |
| **Category: State and Federal Programs** | | | | |
| Affordable Housing and Sustainable Communities (AHSC) Program | X | | X | X |
| Sustainable Communities Competitive Grants | X | | X | X |
| Active Transportation Program (ATP) | X | | | |
| Urban Greening Program | X | X | X | |
| Road Repair and Accountability Act (SB 1) Funding | X | | | |
| Highway Safety Improvement Program (HSIP) | X | | | |
| Local Partnership Program (LPP) | X | X | X | |
| Transportation Alternatives Set-Aside (TASA) Program | X | X | X | |
| Certified Local Government (CLG) Preservation Grants | | X | X | X |
| Environmental Enhancement and Mitigation (EEM) Program | X | | X | |
| California Infrastructure and Economic Development Bank (I-Bank) | X | | X | |
| Community Development Block Grant (CDBG) Program | X | | X | X |
| New Markets Tax Credit (NMTC)* | X | X | X* | |
| Transformative Climate Communities (TCC) | X | X | X | X |
| Infill Infrastructure Grant Program | X | X | X | X |
| Brownfield Grant Funding | X | X | X | X |
| Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) program | X | X | X | X |

*New Markets Tax Credits are applicable to residential projects, but mixed-use developments may be eligible to fund portions of their commercial program with NMTC.

### 7.1.2 Development and Private Sources

A. Development Impact Fees (DIFs). DIFs provide a funding mechanism for new public infrastructure and facilities required to serve new development.

B. Development Agreement (DA) and Disposition and Development Agreement (DDA). A DA is a voluntary but binding contract between a property owner and the jurisdiction in which the property is located that lays out the rules and conditions for development.

C. Foundation and Corporate Sponsorships. Private funds may also be raised for a specific purpose that implements the vision for the FFTOD Specific Plan Area. For example, a variety of foundations provide funding for art installations, healthy community initiatives, and other innovative programs.

### 7.1.3 County Programs, Funds, and Measures

A. Capital Improvement Program (CIP) for the Metro Planning Area. A CIP is a multi-year planning instrument used in most jurisdictions to identify, prioritize, plan, budget, finance, and manage capital improvement projects.

B. Revenue Bonds. Revenue bonds are a class of municipal bonds whose repayment is guaranteed by future revenues generated by specific activities.

C. General Obligation (GO) Bonds and Other Public Debt. GO bonds are a class of municipal bonds that are not secured by the collateral of a funded project, and bond payments do not come from income generated by the bond-funded projects.

D. Multifamily Housing Bonds. Since 1984, the Los Angeles County Development Authority (LACDA) has issued more than $650 million in mortgage revenue bonds for

#### CAP-AND-TRADE PROGRAMS

The State administers a growing number of grant and loan programs, collectively known as the California Climate Investments Program (CCIP), that provide funding for projects and programs that reduce greenhouse gases (GHGs) and provide health, mobility, economic, and other co-benefits to communities throughout the state. Most Cap-and-Trade programs target a substantial portion of their funding to Disadvantaged Communities (DACs) classified in accordance with the CalEnviroScreen tool. The entirety of the FFTOD Specific Plan Area is designated as a DAC per CalEnviroScreen, which is defined as the top 25% scoring areas based on ranking each of the State's 8,000 census tracts using national and state data sources on 20 indicators of pollution, environmental quality, and socioeconomic and public health conditions. This designation establishes priority and a competitive advantage for projects that would benefit the local community in seeking Cap-and-Trade funding. Cap and-Trade provides funding in three primary areas:

1. Transportation and Sustainable Communities
2. Clean Energy and Energy Efficiency Funding
3. Natural Resources and Waste Diversion Funding

Under each of these funding areas are numerous programs that have funding available for projects and programs that would be contained within the FFTOD Specific Plan Area or the County as a whole. The Plan Area's status as a Disadvantaged Community may make potential projects more competitive for Cap-and-Trade-funded financial resources.

multifamily housing. The bonds are issued to developers to finance low- and moderate-income housing for families. The LACDA may issue either tax-exempt or taxable bonds. Taxable bonds would generally be issued only in combination with tax-exempt bonds. Taxable bonds do not require an allocation of bond authority from the California Debt Limit Allocation Committee (CDLAC).

E. Metro and Transportation Development Act (TDA) Funds. TDA Article 3 funds are used by cities within Los Angeles County for the planning and construction of bicycle and pedestrian facilities. By ordinance, LA Metro is responsible for administering the program and establishing its policies.

F. Measure R and Measure M. Measure R and Measure M were Los Angeles County ballot initiatives passed by voters in 2008 and 2016, respectively, that each levy a half-cent sales tax on taxable retail sales to fund a variety of transportation initiatives.

### 7.1.4 State and Federal Programs

A. Affordable Housing and Sustainable Communities (AHSC) Program. The AHSC Program funds land use, housing, transportation, and land preservation projects to support infill and compact development that reduces greenhouse gas (GHG) emissions and administered through the California Department of Housing and Community Development (HCD).

B. Sustainable Communities Competitive Grants. The Sustainable Communities Competitive Grants fund transportation planning activities, such as planning for active transportation, safe routes to schools, transit services, vision zero, complete streets, freight corridors, social equity, integrated land use, and transportation planning. Grants are available on an annual basis and through a competitive application process managed by California Department of Transportation (Caltrans). The planning-focused implementation actions outlined in Table 7-2 (Specific Plan Implementation Actions) are prime candidates for the Sustainable Communities Competitive Grants.

C. Active Transportation Program (ATP). The ATP funds projects that encourage increased use of active modes of transportation to increase non-motorized trips, advance the active transportation efforts of regional agencies to achieve GHG reduction goals, and ensure that disadvantaged communities fully share in the benefits of the program.

D. Urban Greening Program. The Urban Greening Program funds a variety of improvement projects as a program of California Climate Investments funded by Cap-and-Trade dollars.

E. Road Repair and Accountability Act (SB1) Funding. The California Transportation Commission (CTC) considers applications for projects seeking SB 1 (2016) funding to improve roadways, transit, and build walking and biking projects.

F. Highway Safety Improvement Program (HSIP). The HSIP is a core federal-aid program, with funding administered to regions and municipalities by the state, with the aim of achieving a significant reduction in traffic fatalities and serious injuries on all public roads, including non-State-owned roads.

G. Local Partnership Program (LPP). SB1 (2016) created the LPP and continuously appropriates $200 million annually to be allocated by the California Transportation Commission (Commission) to local or regional transportation agencies that have sought and received voter approval of taxes or that have imposed fees dedicated solely for transportation improvements. LPP can fund transportation infrastructure improvements such as improvements to transit facilities, bicycle and pedestrian mobility, local roads, and even items that mitigate the environmental impact of new transportation (e.g., air quality or urban water runoff).

H. Transportation Alternatives Set-Aside (TASA) Program. The Fixing America's Surface Transportation (FAST) Act and the Moving Ahead for Progress in the 21st Century (MAP-21) provide the federal funds for Transportation Alternatives (TAs), which are community-based projects that expand travel choices and enhance the transportation experience. TA projects must be one of 10 eligible activities and must relate to surface transportation.

I. Certified Local Government (CLG) Preservation Grants. A Certified Local Government (CLG) Program has access to federal funds to be used for historic preservation programs.

J. Environmental Enhancement and Mitigation (EEM) Program. The EEM Program funds environmental enhancement and mitigation projects directly or indirectly related to transportation projects.

K. California Infrastructure and Economic Development Bank (I-Bank). The I-Bank finances public infrastructure and private development through issuing tax-exempt and taxable revenue bonds, providing financing to public agencies, providing credit enhancements, acquiring or leasing facilities, and leveraging State and federal funds.

L. Community Development Block Grant (CDBG) Program. The CDBG Program funds the revitalization of neighborhoods, the expansion of affordable housing and economic opportunities, and/ or improvements of community facilities and services, principally to benefit low- and moderate-income persons or neighborhoods.

M. New Markets Tax Credit (NMTC). The NMTC, a federal tax initiative, could be used to stimulate investment in new development, such as commercial corridors, within the Specific Plan Area.

N. Transformative Climate Communities (TTC) Program. The TCC Program is a competitive grant funding community-led development and infrastructure projects that achieve major environmental, health, and economic benefits in the state's disadvantaged communities. The program is intended to empower the communities most impacted by pollution to choose their community vision, strategies, and projects.

O. Infill Infrastructure Grant Program. Promotes infill housing development by providing financial assistance for capital improvement projects that are an integral part of or

necessary to facilitate the development of a Qualifying Infill Project or a Qualifying Infill Area. Funds may not be used for site acquisition.

P. Brownfield Grant Funding. Grants targeted toward a specific purpose in returning contaminated brownfields sites to cleaner and more productive uses.

Q. Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program. Offers low-interest loans of up to $2.5 million for the cleanup of hazardous materials where redevelopment of abandoned and underutilized urban properties is likely to have a beneficial impact on the property values, economic viability, and quality of life of a community. Eligible sites include brownfield sites and underutilized properties.

## 7.2 Implementation

The FFTOD Specific Plan will be implemented through a wide range of measures, the active participation of multiple County departments and agencies, ongoing collaboration with state and regional agencies, investment that supports local community growth, private sector investment, and an engaged community. Facilitating economic investment in the Specific Plan Area will require sustained public and private sector participation over the near and long term. The County can help realize the Specific Plan's vision, goals, and policies and further implement the Plan, particularly with outside funding sources where redevelopment is less likely to occur.

This section includes targeted implementation actions, within timelines and responsible parties, intended to help guide and prioritize the implementation of the Specific Plan.

As changes in priorities, economic conditions, and market trends occur over time, the County may need to revisit and reprioritize the implementation actions. Table 7-1 (Specific Plan Implementation Financing Strategies) identifies potential funding sources and which improvement categories they can apply to. Table 7-2 (Specific Plan Implementation Actions) and the following sections outline implementation actions for the FFTOD Specific Plan, including description, timeframe, and responsible parties for each action.

Through the documenting of existing conditions in Florence-Firestone, and collecting community feedback, potential historic resources were identified. Consistent with the

### Countywide Collaboration to Implement the FFTOD Specific Plan

Implementing the FFTOD Specific Plan requires collaboration across County departments and coordination with existing Countywide implementation programs, plans, and efforts, some of which are listed as follows:

- Department of Regional Planning (DRP)
- Public Works (PW)
- Department of Public Health (Public Health)
- Department of Parks & Recreation (DPR)
- Department of Arts & Culture (Arts & Culture)
- Los Angeles County Department of Consumer & Business Affairs (DCBA)
- Workforce Development, Aging & Community Services (WDACS)
- Los Angeles County Fire Department (FIRE)
- Los Angeles County Public Library (Library)
- Related Agencies:
  - Los Angeles County Development Authority (LACDA)
  - LA Metro
  - Caltrans
  - Neighboring jurisdictions (City of LA, etc.)
  - Union Pacific Railroad (UPRR)

goals of the FFCP, future efforts to evaluate and establish historic districts or resources may be appropriate. See side panel and Chapter 8 for more information.

### 7.2.1 Implementation Actions

Implementing the FFTOD Specific Plan requires collaboration across County departments and outside agencies, such as Metro and Caltrans, as well as coordination with existing Countywide implementation programs, plans, and efforts. All implementation programs should include outreach to community-based organizations (CBOs), and stakeholder groups.

The following implementation actions are intended to guide the County in implementing the FFTOD Specific Plan with generalized timeframes as follows:

- Ongoing: Periodic or on a continuing basis
- Near-Term: 0–5 years
- Medium-Term: 5–10
- Long-Term: 10–15 years

Project implementation is based on funding availability.

#### Potential Historic Resources for Further Assessment:

A Paseo Through Time in Florence-Firestone (Un paseo través del tiempo en Florence-Firestone) (2018), authored by Jeannene Przybylski outlines several community resources of historic or cultural value including:

- Gentry Theater by architect S. Charles Lee; 6525 Compton Ave.
- Storybook house on Firestone Blvd.; 2181 Firestone Blvd.
- Graham Library:
  - 1900 E. Firestone Blvd. (current location)
  - 1925 E. 87th St. (former location)
  - 8511 Holmes Ave. (former location)
- The Century Youth Activities League (formerly the Firestone Park Sheriff's station) by architect James H. Garrott; 7901 Compton Ave.
- Firestone Park Sheriff's station second location; 2201 E. Firestone Blvd. Firestone Park Sheriff's station first location; 1551-1555-1557 E. Florence Ave.
- Tessie Cleveland Community Services Corporation by architect James H. Garrott; 8019 Compton Ave.
- The Youth Activities League; 7116 S. Makee St.
- The Miramonte Blvd. Palm trees along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south)







Images from *A Paseo Through Time in Florence Firestone* (2018). Gentry Theater

## Table 7-2: Specific Plan Implementation Actions

| Action & Description | Timeframe | Performance Metric(s) | Responsible Parties |
|---|---|---|---|
| **Mobility, Infrastructure, and Sustainability (MS)** | | | |
| **MS-1: Bicycle and Pedestrian Infrastructure Improvements**<br>Study implementation pedestrian improvements (new and upgraded crossings) and bicycle improvements (bicycle corridor segments) per the Mobility Element, Bicycle Master Plan, Pedestrian Plan, Metro A Line (Blue) First/Last Mile Plan, and the Slauson Station Area TOD Specific Plan project list outlined in Section XX of Chapter 6: Mobility. | Near-Term | • Number of bicycle and pedestrian infrastructure improvements installed<br>• Number installed by TOD Station Area | PW<br>Metro |
| **MS-2: Traffic Calming Improvements**<br>Study corridor-scale traffic calming improvements such as speed bumps, curb extensions, and traffic circles to discourage speeding and neighborhood cut-through traffic, per the Mobility Element. Consider site-specific improvements could be implemented with redevelopment to minimize disruption. | Near-Term | • Number of traffic calming improvements installed<br>• Number installed on residential streets (identified as a key need) | PW |
| **MS-3: Bus Stop Improvements**<br>Install lighting, street trees, benches, shelters, recycling and trash bins, wayfinding signage, and route information at all bus stops throughout the FFTOD Specific Plan Area. | Near-Term | • Number of bus stop improvements<br>• Number installed by TOD Station Area | PW<br>Metro |
| **MS-4: Metro A Line Pedestrian Overpass**<br>Replace and reconstruct the pedestrian bridge connecting the west side of the community at E 76th Street to Roosevelt Park at Graham Avenue. Incorporate public art to create a pleasing visual marker for the community. Explore additional locations for pedestrian bridge crossings or other connection methods to safely connect community members to parks and community resources across the A Line and railroad rights-of-way. | Long-Term or with the redevelopment of adjacent parcels | • Replacement and reconstruction of pedestrian bridge at E. 76th Street | PW<br>Metro<br>Arts and Culture |
| **MS-5: Pedestrian Path to Slauson Station from 60th Street.**<br>Formalize the informal pedestrian pathway leading from 60th Street to Slauson Avenue, connecting neighborhoods to the south of Slauson Station to the station entrance. This pathway is already used as an access point to the station and provides a more direct path of travel to the station entrance. Formalizing the path will require:<br>1. Acquisition of the rail right-of-way underneath the A (Blue) Line<br>2. Coordination with Metro<br>3. Coordination with PW<br>This would be most likely to occur with nearby redevelopment or with the implantation of the West Santa Ana Branch (WSAB) Line, which does not currently address this path. | Long-Term or with redevelopment of adjacent parcels | • Formalization of pedestrian path | PW<br>Metro<br>DRP<br>Caltrans |
| **MS-6: Additional station access points at Firestone and Florence Stations** | Mid-Term | • Number of station access points | Metro<br>PW |

| Action & Description | Timeframe | Performance Metric(s) | Responsible Parties |
|---|---|---|---|
| The Metro A (Blue) Line Stations in the FFTOD Specific Plan Area each only have one access point. The Slauson Station will see expanded access as the WSAB Line is implemented, but the Florence and Firestone Stations would also benefit from improved access, including:<br>• Florence Station: The community suggested the creation of a second at-grade access point at the south end of the platform.<br>• Firestone Station: An additional entrance on the west side of the rail tracks could be implemented to allow better access from the west without needing to cross under the elevated rail line. | | constructed in the Specific Plan | Caltrans |
| **MS-7: Undercrossing improvements at Firestone Station**<br>The underpass beneath the Firestone Station supports bus stops in the eastbound and westbound directions and serves as a major transfer point. However, the bus stop amenities at this location are minimal due to space constraints. Community input has requested improvements and beautification of this space in the form of better lighting, murals, landscaping, and features to improve perceptions of safety (such as emergency phones). | Mid-Term | • Number of undercrossing improvements installed | Metro<br>PW<br>Caltrans |
| **MS-8: Implement Metro Rail to Rail improvements along Slauson Avenue**<br>Include a new crosswalk at Slauson Station. Consider expanding the scope to include a Mobility Hub. | Mid-Term | • Number of Rail to Rail Improvements<br>• Slauson Station crosswalk<br>• Mobility Hub | PW<br>Metro |
| **MS-9: Green Alleys**<br>Implement the PW's Green Alley Master Plan and develop identified green alley sites. Explore implementing additional green alley sites per the Specific Plan. Consider expanding to include other green street treatments (bioswales in curb extensions, stormwater capture, expansion of parks and open space, use of permeable materials where possible**.** | Mid-Term | • Number of alleys converted to green alleys | PW<br>FIRE<br>DPR<br>DRP |
| **MS-11: Re-envision Union Pacific Site near Slauson Station**<br>Explore opportunities to lease or acquire the UPRR site along Randolph Street and Metro right-of-way. Opportunities in the short term include a surface parking lot for Slauson Station. Long-term opportunities include park space for the community. | Medium-Term to Long-Term | • Leasing or acquisition of UPRR side<br>• Installation of a surface parking lot<br>• Construction of park space | DRP<br>DPR<br>UPRR<br>Metro |
| **MS-12: Parkway Maintenance Plan**<br>To enable implementation of the County TOD Toolkit, develop a countywide plan for maintaining street trees and pedestrian lighting installed by private development. Consider a pilot program for the FFTOD Specific Plan Area to develop a maintenance plan with additional standards and demonstrate implementation of the plan in the Florence-Firestone community. | Near-Term | • Initiation of pilot program for FFTOD Specific Plan Area | PW |

| Action & Description | Timeframe | Performance Metric(s) | Responsible Parties |
|---|---|---|---|
| **MS-13: Conduct a Comprehensive Parking Study for Florence-Firestone**<br>Prepare a comprehensive parking study for the FFTOD Specific Plan including:<br>• Document existing parking conditions in this community.<br>• Better manage existing public and private parking supply in the community to alleviate existing parking deficiencies.<br>• Identify strategies and techniques to manage the existing parking supply as growth occurs in the area.<br>• Identify options for reducing parking requirements for new development in the vicinity of LRT stations. | Near-Term | • Initiation of Parking Study | DRP<br>PW |
| **MS-14: Install LA Metro Bikeshare Stations**<br>Site bikeshare stations at Slauson, Florence, and Firestone Stations and along commercial corridors throughout the Florence-Firestone community. | Near-Term | • Number of installed bikeshare stations within the FFTOD Specific Plan Area | Metro<br>PW |
| **MS-15: Implement TNC partnership to support first/last mile travel to LA Metro stations**<br>Pilot a partnership with Transportation Network Companies (TNC) providers (Lyft, Uber) to support first/last mile access to the Metro stations from within the Florence-Firestone community. | Mid-Term | • Initiation of pilot partnership for FFTOD Specific Plan Area | Metro<br>PW |
| **MS-16: Expand the Link service hours and routes to improve first/last mile connections to Metro stations and enable short transit trips within Florence-Firestone**<br>The Florence-Firestone/Walnut Park route on the Link provides access between Gage Avenue and 92nd Street, connecting neighborhoods within Florence-Firestone and Walnut Park to the Florence and Firestone Metro stations. Expanding the route to serve Slauson Station and increasing the frequency from approximately 60-minute headways to 10-minute headways, pending projected ridership, would drastically improve local connectivity to Slauson Station and to destinations within the Florence-Firestone community. | Mid-Term | • Route expansion study<br>• Expansion of service hours and routes within the FFTOD Specific Plan Area | PW |
| **CP-3: Slauson Station Coordination**<br>Maintain coordination efforts related to Rail to River and WSAB improvements. | Ongoing | • Rail to River and WSB improvements | DRP |
| **Cultural Resources and Community Identity (CR)** | | | |
| **CR-1: Miramonte Boulevard Historic District**<br>Explore designating Miramonte Boulevard between Gage Avenue and Florence Avenue as a Historic District in coordination with the Historical Landmarks and Records Commission**.** | Medium-Term | • Public outreach to explore Historic District establishment | DRP |
| **CR-2: Historic Resources Survey**<br>Conduct a Historic Resources Survey with community outreach to allow community members opportunities to provide input on local historic and cultural resources valuable to the community. Build off of the list of potential historic | Near-Term | • Initiation of Historic Resources Survey | DRP |

| Action & Description | Timeframe | Performance Metric(s) | Responsible Parties |
|---|---|---|---|
| resources identified in *A Paseo Through Time in Florence-Firestone* (2018). | | | |
| **CR-3: Cultural Equity and Inclusion**<br>Promote addition of art in the community and continue public outreach events consistent with the Countywide Cultural Policy, and Cultural Equity and Inclusion Initiative. | Medium-Term | • Number of mural permits applied for/approved<br>• Public outreach events | Arts and Culture<br>DRP |
| **Economic Development and Community Assistance (ED)** | | | |
| **ED-5: Business Improvement District for Firestone Boulevard**<br>Study the feasibility to form a Business Improvement District (BID) for Firestone Boulevard to fund business-related improvements, maintenance, and physical amenities. | Medium-Term | • Establishment of a BID for Firestone Boulevard | LACDA |
| **ED-6: Community-Serving Facilities in New Development**<br>Identify opportunities to financially support new development of community-serving facilities (such as health clinics and job training centers) through County leasing of space for community-serving facilities. | Near-Term | • Number of new leases for community-serving facilities | LACDA<br>DRP |
| **ED-7: TOD Catalyst Project**<br>Fund joint private/public mixed-use catalyst projects to diversify commercial uses in the TOD areas and provide services that cater to residents' and workers' daily needs. | Long-Term | • Number of joint private/public mixed-use catalyst projects funded | LACDA<br>Metro |
| **ED-8: Public Development of Joint Amenities**<br>Explore opportunities to encourage development with joint amenities on County-owned land to benefit developers and the community, including short-term safe parking and shared parking for surrounding businesses | Medium-Term | • Number of joint amenities developed | DRP |
| **Coordination and Partnerships (CP)** | | | |
| **CP-2: Metro Coordination**<br>Coordinate with Metro on station area improvements to Slauson, Florence, and Firestone to ensure the FFTOD Specific Plan vision and guiding principles are implemented through these station area improvements and in line with community needs. | Medium-Term | • Coordinate with LA Metro during the planning phase of station area improvements | DRP<br>Metro |
| **CP-4: Community Land Trust Study for Florence-Firestone**<br>Explore opportunities to collaborate with community land trusts (CLTs) to acquire property and become long-term landowners of land and protectors of affordability as part of economic development and security for the community. | Medium-Term | • Initiation of CLT study for FFTOD Specific Plan Area | LACDA |
| **CP-5: Coordination with LAUSD**<br>Explore funding opportunities to coordinate with LAUSD on safety improvements and traffic/parking enforcement in the FFTOD Specific Plan Area in proximity to schools. | Medium-Term | • Number of traffic incidents/fatalities | PW |

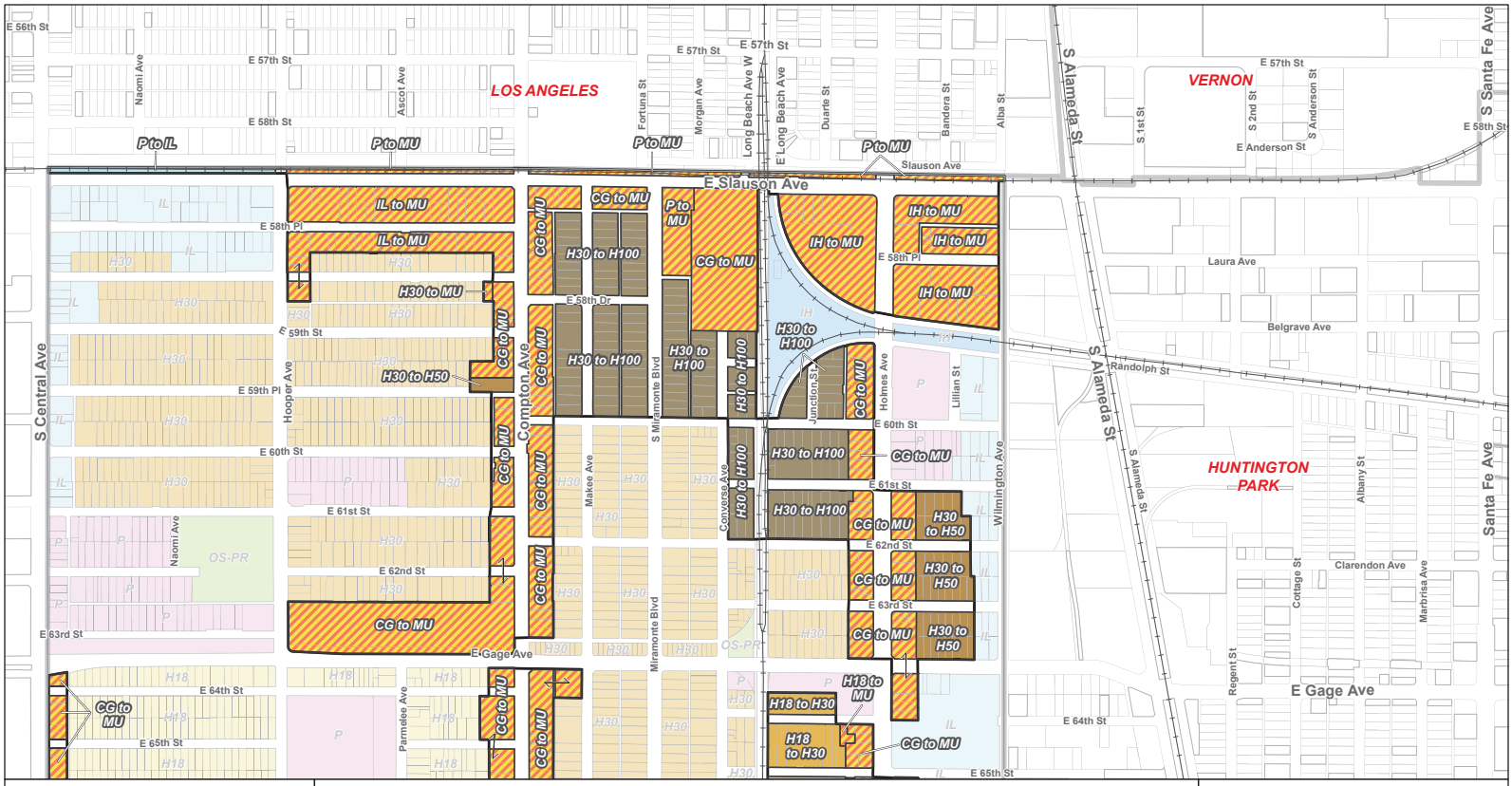






**County of Los Angeles Department of Regional Planning**
**January 2022**

# EXHIBIT B




**AMENDMENT TO: FLORENCE-FIRESTONE COMMUNITY PLAN**

**Plan Amendment: RPPL2020009556**
**Adopted On:**

- *H9 - Residential 9*
- *H18 - Residential 18*
- *H30 - Residential 30*
- *H50 - Residential 50*
- *H100 - Residential 100*
- *CG - General Commercial*
- *CM - Major Commercial*
- *MU - Mixed Use*
- *IL - Light Industrial*
- *IH - Heavy Industrial*
- *OS-PR - Parks and Recreation*
- *P - Public and Semi-Public*
- *Continuity Indicator*

- *Land Use Change Area**
- *City / Unincorporated Community Boundary*
- *Parcels*

** Categories that are changing are shown in solid colors while categories that are unchanged have pastel colors (these are not shown in the legend)*

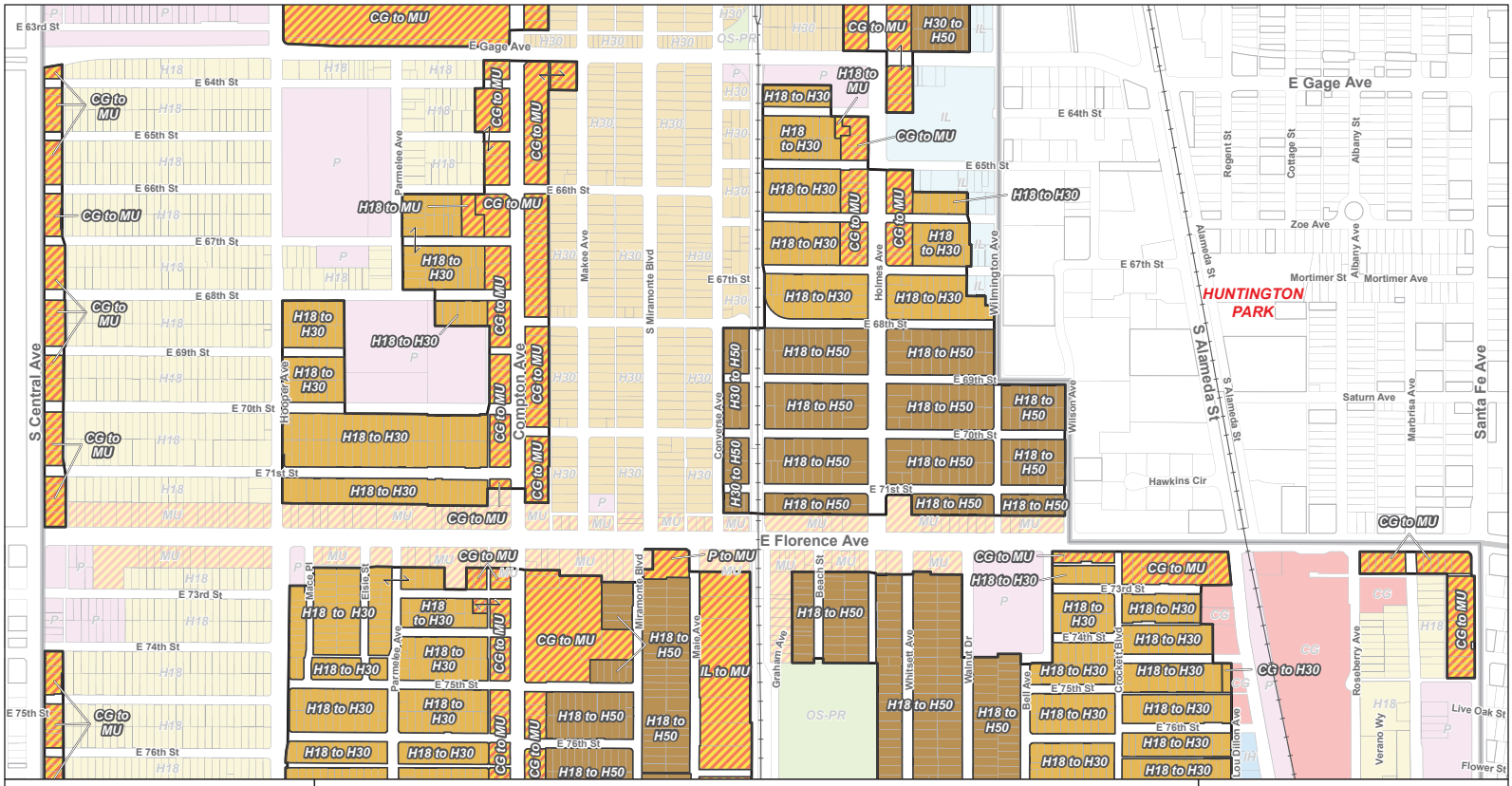


*LOS ANGELES COUNTY*
*Dept. of Regional Planning*
*320 W. Temple St., 13th Floor*
*Los Angeles, CA 90012*

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*Prepared by DRP GIS Section / December 2021*

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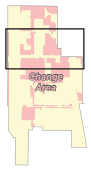

**AMENDMENT TO: FLORENCE-FIRESTONE COMMUNITY PLAN**

**Plan Amendment: RPPL2020009556**
**Adopted On:**

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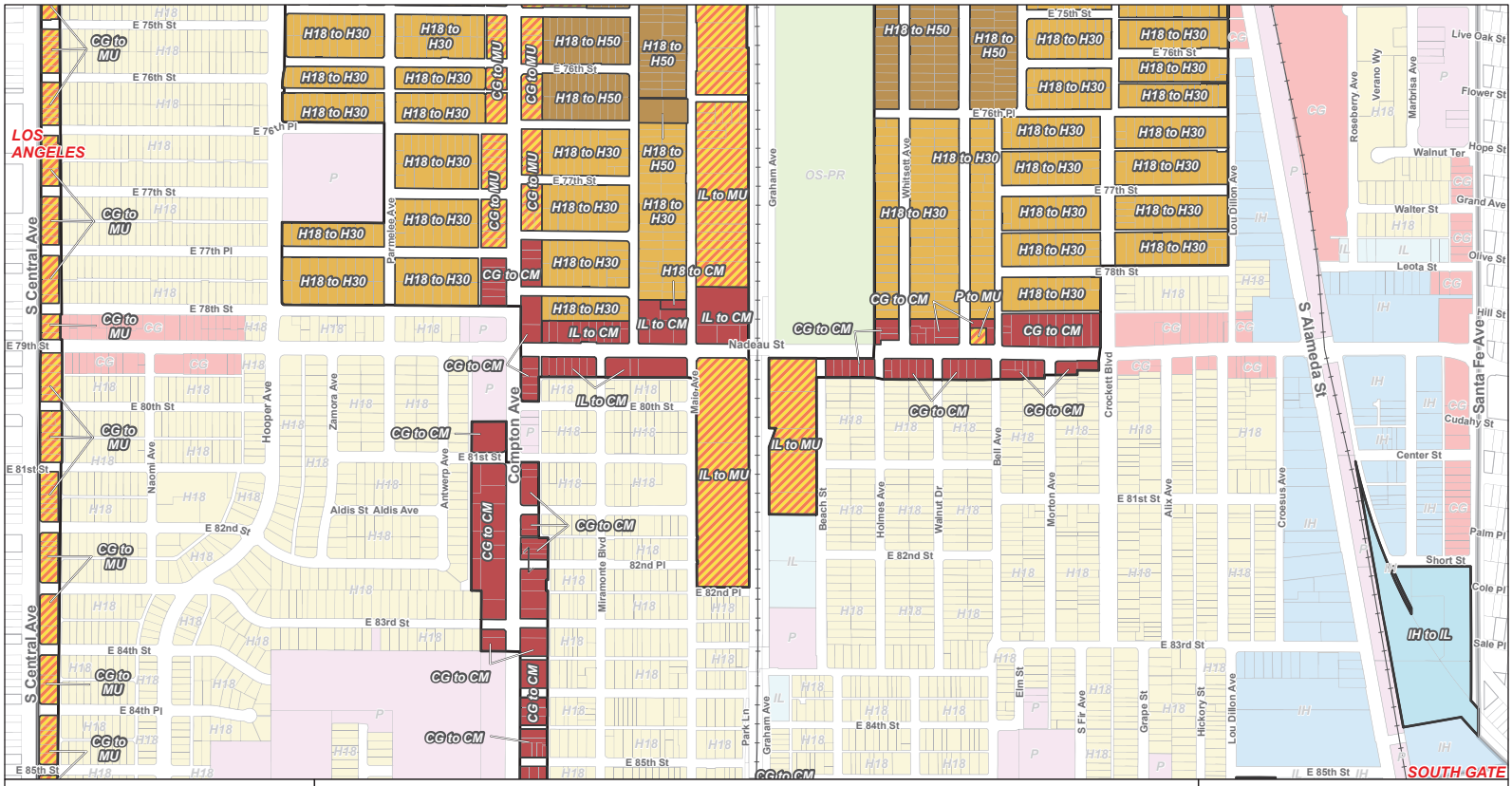

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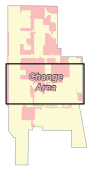

**AMENDMENT TO: FLORENCE-FIRESTONE COMMUNITY PLAN**

**Plan Amendment: RPPL2020009556**
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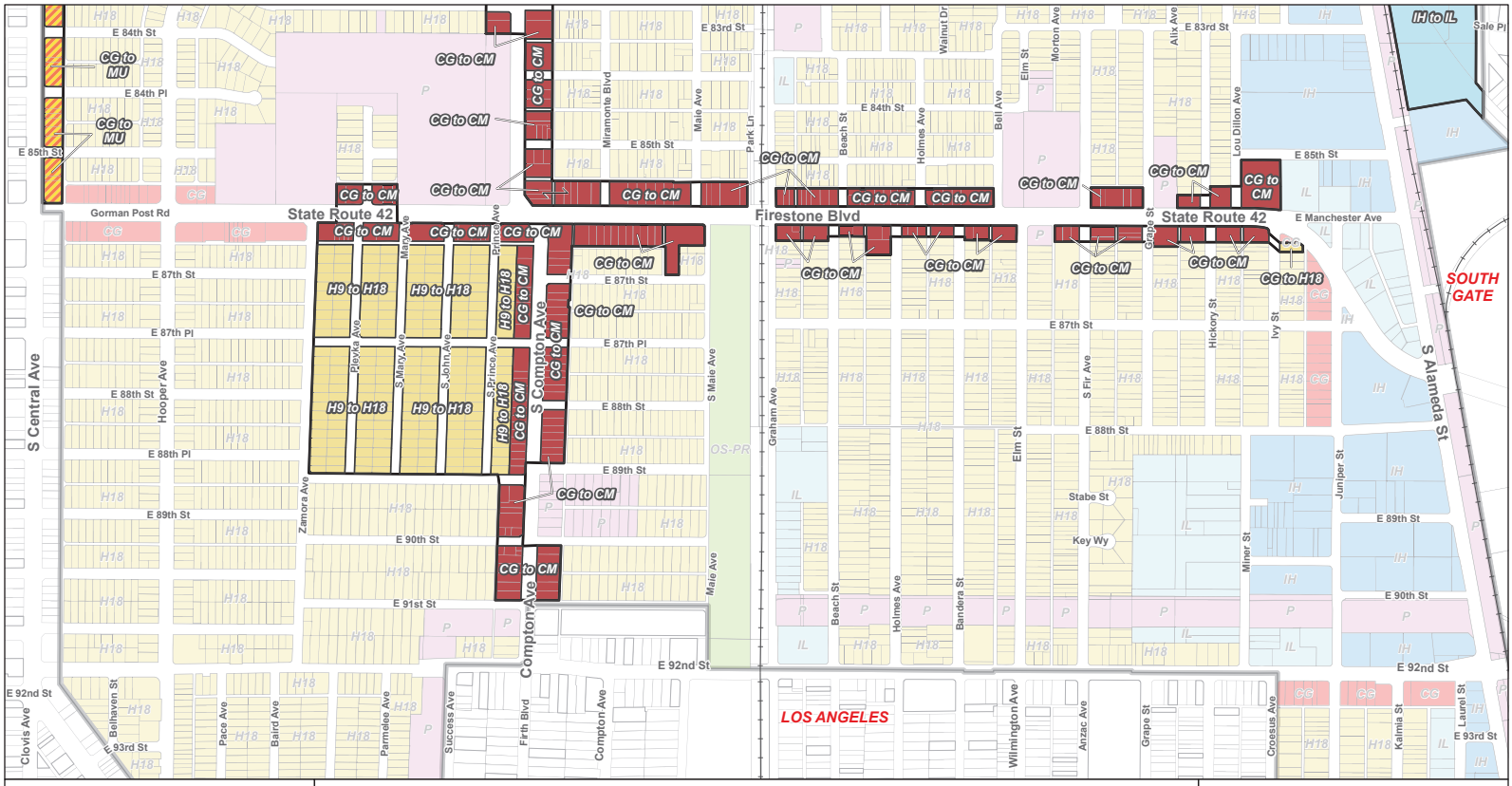

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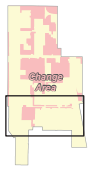

**AMENDMENT TO: FLORENCE-FIRESTONE COMMUNITY PLAN**

**Plan Amendment: RPPL2020009556**
**Adopted On:**

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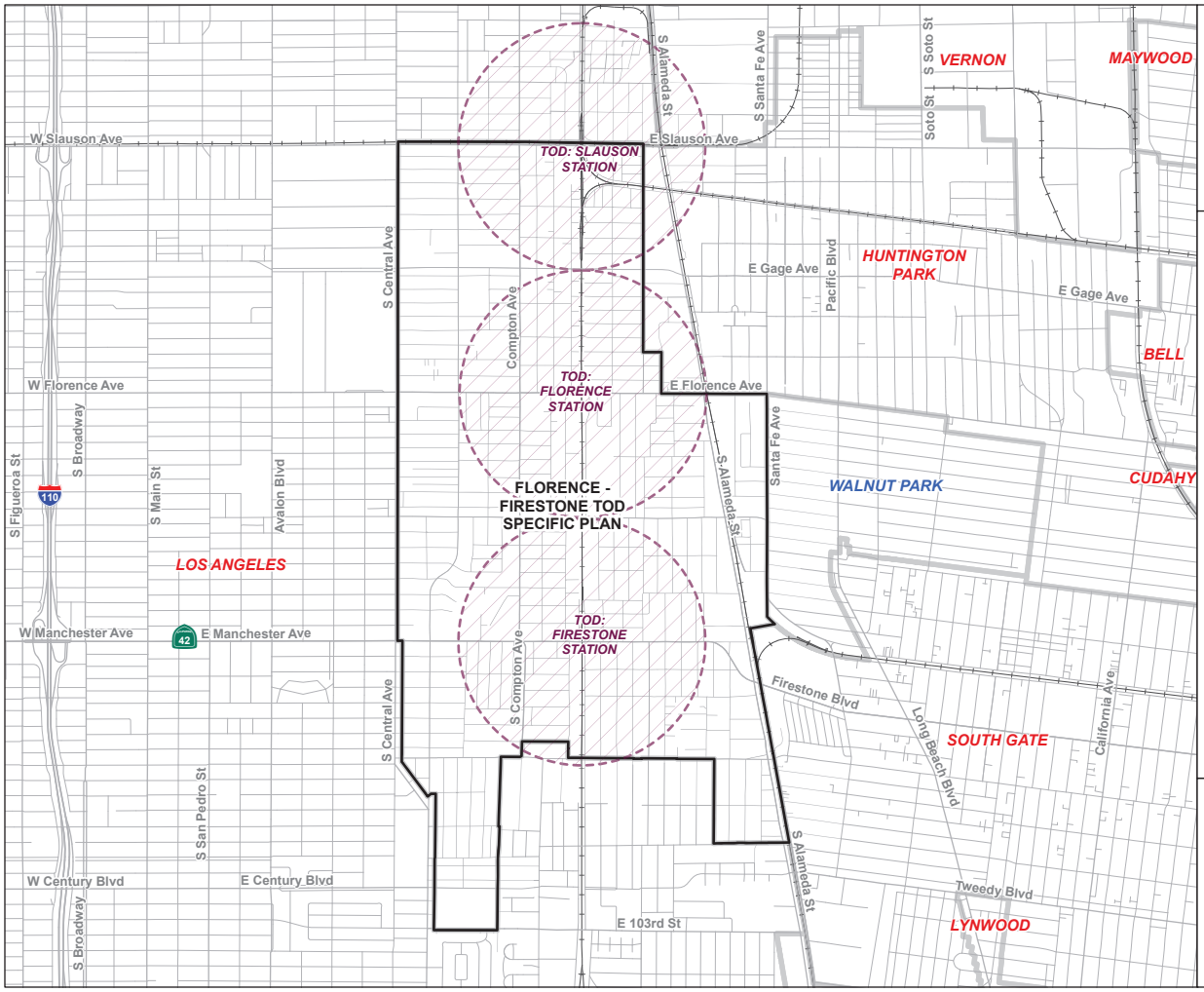
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# EXHIBIT C




**AMENDMENT TO: FLORENCE-FIRESTONE COMMUNITY PLAN**

**Plan Amendment: RPPL2021002373**
**Adopted On:**

UPDATING TOD 1/2 MILE BUFFER TO TOD SPECIFIC PLAN BOUNDARY

TOD Specific Plan Boundary
1/2 Mile Buffer (Adopted by General Plan 2035)
City / Unincorporated Community Boundary

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*Los Angeles, CA 90012*

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*Prepared by DRP GIS Section / December 2021*

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# EXHIBIT D

## Organization

The Community Plan is organized into five chapters.

- **Chapter 1:** Introduction, provides a summary of the Plan and how it was developed.
- **Chapter 2:** Community History, relates the area's long and rich history.
- **Chapter 3:** Existing Conditions, describes the community's current physical condition, including demographic and land use data, providing the context for the community vision, goals, policies, and recommended actions in the subsequent chapter.
- **Chapter 4:** Goals and Policies, is organized into twelve categories. Each category contains a vision statement, background information, description of opportunities, and goals and policies. The goals and policies establish the means for achieving the community's shared vision.
- **Chapter 5:** Implementation, contains a list of recommended actions that help realize the goals and policies presented in Chapter 4. The implementation actions are optional and are to be carried out upon allocation of funding and resources.

## Themes

The Community Plan organizes goals and policies into broad land use categories. However, there are themes that cut across more than one policy category. These recurring themes or issues have been identified in various studies and reports, as well as voiced by community members. At its core, all the goals and policies address the themes identified below.

- **Public Safety.** Reduce crime and pedestrian-vehicular conflict, and improve safety around schools and areas of pedestrian activity, including commercial corridors, crosswalks, transit stations, bus stops, parks and other public spaces.
- **Industrial-Residential Land Use Conflict.** Resolve the incompatibility between proximate industrial and residential land uses to improve the health and welfare of the community.
- **Maintenance.** Invest in public and private facilities, including maintaining and improving structures, renovating residential properties, maintaining and upgrading multifamily residences, clearing litter and illegal dumping in

the public right-of-way, improving building facades in commercial and industrial areas, and enhancing pedestrian corridors with trees, lighting, and pedestrian amenities, where appropriate and feasible.

- **Enforcement.** Proactively enforce code rules and regulations. Require unpermitted uses to comply with regulations and development standards to improve quality of life.
- **Economic Development.** Preserve existing jobs, expand the job base, support diversification of commercial and industrial uses, promote job training programs, and increase economic development opportunities within the community.
- **Public Space.** Establish a community center/plaza, increase open space/ parks, and improve park facilities, including safety, lighting, and meeting rooms within County facilities.
- **Transit-Oriented Development.** For areas around Metro Blue Line Stations, encourage development of high-density affordable housing, promote the establishment of job-generating uses, support the development of community-serving retail uses, and adopt a Transit Oriented District specific plan for Florence, Firestone, and Slauson Blue Line Stations,
- **Housing.** Increase housing opportunities, including the availability of affordable housing, preserve existing residential neighborhoods, increase homeownership, and relieve overcrowding.
- **Environmental Justice.** Promote clean and sustainable business practices and reduce negative environmental impacts in industrial and commercial areas, provide more open space, encourage public participation in decision-making processes, and increase access to information.
- **Mobility and Connectivity.** Increase safe, clean, and easy access to alternative modes of transportation and create an integrated network of rail lines, bus routes, pedestrian walkways and bicycle facilities.
- **Equity.** Take advantage of the Cap-and-Trade funds available to disadvantaged communities and seek funding from both public and private resources for community improvement projects.

### Applicability

Completed applications filed prior to the effective date of this Community Plan shall be reviewed for consistency with the Los Angeles County General Plan

("General Plan"). New applications filed after the effective date of the Community Plan are subject to the provisions herein. Existing projects may be maintained as originally approved provided the approval is still valid, has not expired, and is consistent with applicable policies.

### Methodology

The Community Plan was developed with the help of many planners and community members who volunteered their time to share their knowledge and expertise, review draft documents, and provide feedback.

The Community Plan builds on past planning efforts, drawing information from a variety of studies and reports on the community. The 2009 Florence-Firestone Vision Plan provided a comprehensive, long-term vision for the community through the collaborative effort of residents, businesses, stakeholders, County departments, and local organizations. Following the Vision Plan, studies focused on market feasibility, land use and transportation. These reports and studies, and their recommendations informed this Community Plan. A complete list of the source materials is listed below.

- Florence-Firestone Community Background Report, Los Angeles County Department of Regional Planning (DRP) – 1970
- Florence-Firestone Community General Plan Staff Report, DRP – 1971
- Florence-Firestone Community Standards District Ordinance, DRP – 2004
- Florence-Firestone Vision Plan, Raimi + Associates – 2009
- Florence Mile Parking Study Report, Gin Wong Associates – 2008
- Florence-Firestone Community Parks and Recreation Plan, Los Angeles County Department of Parks and Recreation – 2010
- Slauson Blue Line Station Transit Oriented Development (Technical Assistance Panel Program), Urban Land Institute – 2010
- Florence-Firestone Community Plan Market Feasibility Analysis, URS – 2010
- Florence-Firestone Community Plan Land Use and Sustainability Indicators Report, URS – 2010
- Florence-Firestone Community Plan Transportation Planning and Transit Oriented Development Evaluation, URS – 2010
- Florence-Firestone Community Plan Background Report, DRP – 2011
- Los Angeles County General Plan Industrial Land Analysis, DRP – 2011
- Los Angeles County Bicycle Master Plan – 2012
- Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment – 2016

## Relationship to the Los Angeles County General Plan

The General Plan is a Countywide land use policy document that guides the long-term physical development and conservation of the unincorporated areas. The unincorporated areas of Los Angeles County is comprised of approximately 2,650 square miles and one million people. The General Plan organizes this vast area into 11 Planning Areas to provide for the development of local plans that respond to the needs of communities through the Planning Areas Framework. Florence-Firestone is located within the Metro Planning Area.

All community plans are extensions of the General Plan and is based on the framework established by the General Plan. As such, the Florence-Firestone Community Plan is part of the General Plan and is consistent with the General Plan's guiding principles, goals and policies. The Florence-Firestone Community Plan is a localized, community based plans that contains goals, policies and implementation actions specific to the issues and needs of the Florence-Firestone community. Figure 1.1 illustrates the relationship of the General Plan to community-based plans.

**General Plan Figure 1.1:**
Relationship of General Plan to Community-Based Plans




### Countywide General Plan Guiding Principles

The Community Plan is based on the General Plan's five guiding principles and the sustainability precept that emphasizes the need for planning and development activities to meet current needs without compromising the ability of future generations to realize their economic, social, and environmental goals. The following General Plan's guiding principles informed the goals, policies and implementation actions contained in the Community Plan.

1. Employ Smart Growth: Shape new communities to align housing with jobs and services; protect and conserve the County's natural and cultural resources, including the character of rural communities.

2. Ensure community services and infrastructure is sufficient to accommodate growth: Coordinate an equitable sharing of public and private costs associated with providing appropriate community services and infrastructure to meet growth needs.

3. Provide the foundation for a strong and diverse economy: Protect areas that generate employment and promote programs that support a stable and well-educated workforce. This will provide a foundation for a jobs-housing balance and a vital and competitive economy in the unincorporated areas.

4. Promote excellence in environmental resource management: Carefully manage the County's natural resources, such as air, water, wildlife habitats, mineral resources, agricultural land, forests, and open space in an integrated way that is both feasible and sustainable.

5. Provide healthy, livable and equitable communities: Design communities that incorporate their cultural and historic surroundings, are not overburdened by nuisance and negative environmental factors, and provide reasonable access to food systems. These factors have a measureable effect on public well-being.

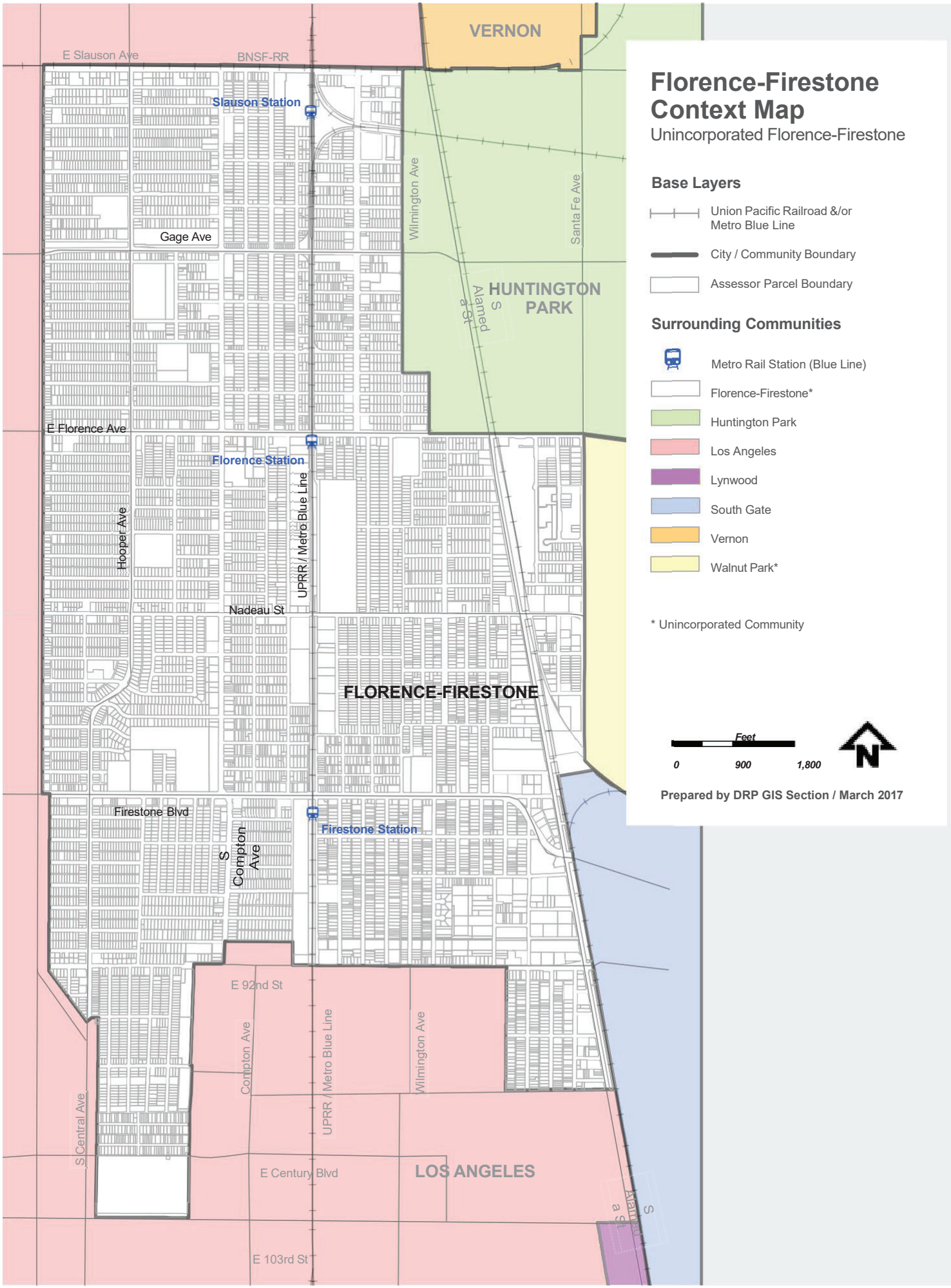
### Other Land Use Documents

The General Plan's goals and policies are implemented by the Zoning Code (Title 22 of the County Code). The Zoning Code specifies development standards, permits and processes required for the development of a property. Some areas have an overlay district in addition to the base zone. Projects in an overlay district are subject to standards and requirements of the overlay district in addition to the standards and requirements of the base zone.

Florence-Firestone contains two overlay districts, the Florence-Firestone Community Standards District (CSD) and Transit Oriented District (TOD).

The Florence-Firestone CSD was adopted in 2004 and is applicable to the entire community. The purpose of the CSD is to "improve the appearance of the community and to promote the maintenance of structures and surrounding properties" with an emphasis on addressing incompatible land uses. The CSD contains requirements related to graffiti, maintenance, setbacks, signs, density, and height. The CSD also requires a conditional use permit for outdoor businesses within 250 feet of a residential zone or sensitive use to reduce conflicts between proximate industrial and residential land uses.

The TOD is applicable to an area within a ½-mile radius of each of the three Metro Rail Blue Line stations in Florence-Firestone. The TODs were established by the General Plan to facilitate transit-oriented development. Each TOD needs to be implemented through a specific plan or a similar mechanism to address land use, development standards, regulations, infrastructure, access and connectivity, pedestrian environment, and safety specific to each TOD. Florence-Firestone contains three TODs, at the Slauson, Florence, and Firestone Stations. A specific plan or a similar planning document needs to be developed for the TODs in Florence-Firestone.




# Florence-Firestone Context Map

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Surrounding Communities

- Metro Rail Station (Blue Line)
- Florence-Firestone*
- Huntington Park
- Los Angeles
- Lynwood
- South Gate
- Vernon
- Walnut Park*

* Unincorporated Community

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Prepared by DRP GIS Section / March 2017

## Residential Areas (R)



Multi-family housing in Florence-Firestone.



Residential subdivision in Florence-Firestone.

### Vision

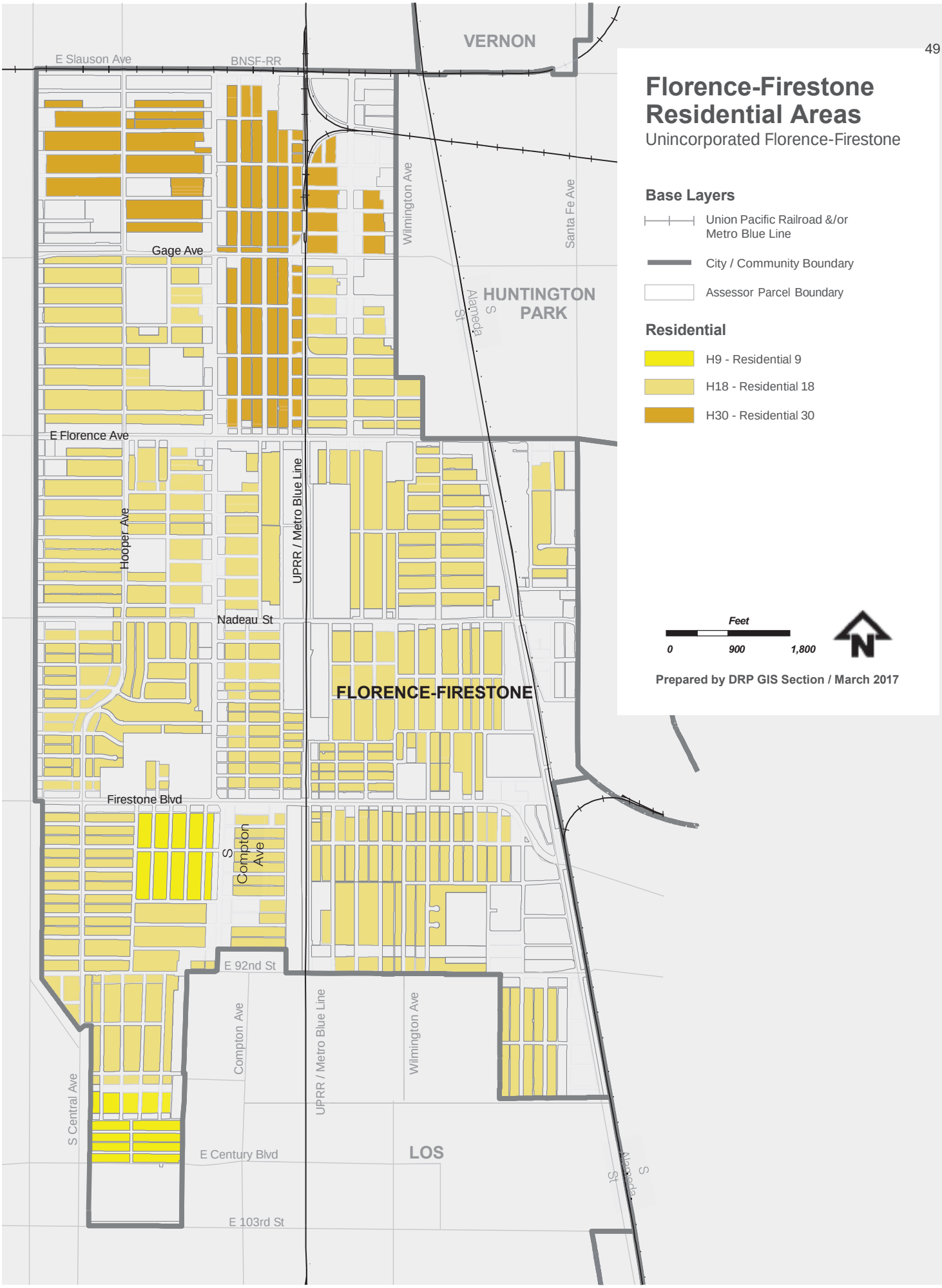
Develop and maintain high-quality housing, increase opportunities for home ownership, and provide a range of housing options to meet the needs of all residents, across a range of incomes, from large households to retired individuals.

### Background

The majority of land in Florence-Firestone is used for housing. Sixty-three percent of existing land use is residential. Approximately 34% is made up of single-family structures concentrated in residential neighborhoods. Low-density multifamily structures, such as duplexes and triplexes, are built adjacent to single-family residences. Medium-density housing is located along major corridors and intersections. Multifamily residences total 28.5% of existing land uses. Overall, residential zoning throughout the community allows for greater density than existing development. The residential zoning primarily consists of R-2 (Two-Family Residence) and R-3 (Limited Density Multiple Residence) zones. However, approximately half of the R-2 and R-3 zoning retains the character of single-family neighborhoods.

Florence-Firestone is one of the densest communities in the County, with a comparatively high rate of persons per household and population density, 4.2 persons per dwelling unit compared to 2.86 countywide. A majority of residents in the community are renters and are vulnerable to increasing housing costs. Among the consequences of rising housing costs are hidden density, informal housing, and overcrowding. Several families often share single housing units and garages are converted to living quarters or other unpermitted housing arrangements. This contributes to the lack of parking on residential streets. In addition, approximately 50% of residential structures pre-date 1960 and require additional maintenance to continue to provide high-quality housing.

However, a key strength of the community is its strong family-orientation with multi-generational households. Many families have lived in the community for several generations, creating strong local ties, sharing cultural traditions, and fostering pride in the community. The section's goals and policies have been written to address specific residential conditions in the Florence-Firestone community. Direction is also taken from the housing policies and programs developed on a countywide level in the General Plan Housing Element.




# Florence-Firestone Residential Areas

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Residential

- H9 - Residential 9
- H18 - Residential 18
- H30 - Residential 30

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Prepared by DRP GIS Section / March 2017



Residential neighborhood in Florence-Firestone.

## Opportunities and Challenges

### Increase Housing Supply

There is need for additional housing options in strategic locations to allow aging in place, purchase of starter homes for families, and to accommodate a range of needs, family sizes, and incomes. Changes to state law regulating accessory dwelling units (ADU) will ease the legalization of existing ADUs and construction of permitted ADUs. This will help increase the housing supply and affordability, and enable current residents to live in legally permitted housing.

Higher-density housing should be directed to TODs and commercial areas to support transit access and the development of diverse retail and community services. This would enable greater diversity of housing types in the community and increase the affordable housing supply. This will also help protect single-family residential neighborhoods from potential development pressures and overcrowding. Investment in infrastructure, community resources, and community services would be needed to support higher density development in TOD and commercial areas.

New housing should be also directed towards infill development of vacant properties. Current zoning allows for higher density housing development than exists. Infill development in existing residential neighborhoods should reflect the character of the neighborhood and be consistent with the low-scale, single-family character of residential streets.

### Residential Revitalization

Residential structures in the community are aging due to the high percentage of rental properties with deferred maintenance and difficulty in obtaining financing for improvements. With public outreach and strategic reinvestment by property owners, including supportive programs provided by public agencies, housing can be well-maintained and the lifespan of the structures expanded.

Investment in the public realm, such as improvements to streetscapes, sidewalks, pedestrian and bike infrastructure, and increased lighting in residential areas to improve access to transit, schools, parks, and support community well-being, can further contribute to a higher quality of life.

## Goals and Policies

### INCREASE HOUSING OPPORTUNITIES

**GOAL R-1**

**Housing options meet a range of residents' needs, income levels, and household sizes, providing for increased housing supply and affordability.**

Policy R-1.1

**Accessory Dwelling Units.** Support legalization of accessory dwelling units. Ensure protections for residents living in unpermitted units and offer alternate affordable housing options as needed.

Policy R-1.2

**Affordable Housing Supply.** Increase the supply of different housing types affordable to the community.

Policy R-1.3

**Housing for Large Households.** Design housing that meets the needs of large households and multigenerational families, which can include projects featuring multiple units with three or more bedrooms and other amenities and supportive services. (Refer to Equal Housing Opportunity policies in the Housing Element of the General Plan for more information.)

Policy R-1.4

**Streamline Affordable Housing Development.** Streamline and expedite affordable housing projects through the project and environmental review process and coordinate with private and non-profit organizations.

Policy R-1.5

**Residential Overcrowding.** Provide a range of housing choices and programs targeted to alleviate overcrowding.

Policy R-1.6

**Displacement of Residents.** Discourage the displacement of existing residents as new housing opportunities are developed.

Policy R-1.7

**No Net Loss of Affordable Units.** Ensure that there is no net loss of affordable housing units in the community.



Community garden as part of multifamily housing development.
*Courtesy, Housing Authority of Los Angeles County.*

## General Plan Policies

Housing Element, Housing Affordability

**Policy 3.1:** Promote mixed income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population.

Housing Element, Equal Housing Opportunity

**Policy 8.1:** Support the distribution of affordable housing, shelters, and transitional housing in geographically diverse locations throughout the unincorporated areas, where appropriate support services and facilities are available in close proximity.

### GOAL R-2

**Development of new higher density housing is located near transit stations and along major corridors.**

Policy R-2.1

**Housing in Commercial Areas.** Facilitate by-right development of higher-density mixed-use and multi-family housing along major corridors and within walking distance of transit stations.

Policy R-2.2

**Incentivize Communal Spaces.** Incentivize new mixed use and multi-family developments to include open space, including plazas, common areas, gardens, and walking paths.

Policy R-2.3

**Appropriate Higher-Density Housing.** Locate higher residential density housing, including senior, affordable, and mixed-income housing along major commercial corridors, near transit stops, and adjacent to public service facilities and ensure context-sensitive design.

Policy R-2.4

**Neighborhood Stability.** Maintain neighborhood stability further from Metro Stations. Focus new development around the three Metro A line stations by maintaining existing residential zoning outside the TOD areas.

**GOAL R-3**

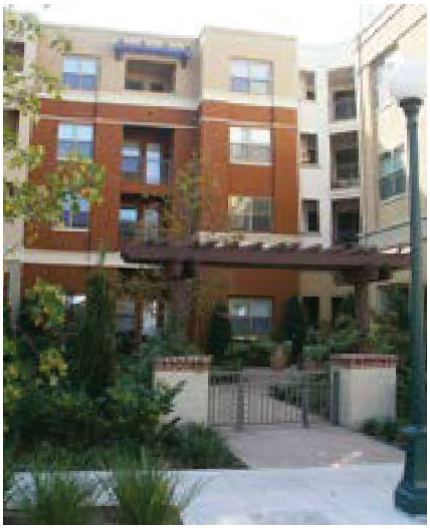
**Residents can own the homes where they live.**

Policy R-3.1

**Increase For-Sale Housing.** Increase the supply of for-sale housing, affordable to a wide range of income levels through provision of diverse housing types.

Policy R-3.2

**Homeownership Programs.** Expand and increase access to homeownership programs, connecting residents to resources and financing.



Example multi-family housing design with an entry court and dwelling units with good access to natural light.
*Draft West Carson Transit-Oriented District Specific Plan, 2016.*

## RESIDENTIAL REVITALIZATION

**GOAL R-4**

**Residential neighborhoods are safe and attractive places to live.**

Policy R-4.1

**Residential Maintenance.** Support residents' active involvement in neighborhood improvement efforts, to monitor housing needs and concerns, and to facilitate maintenance of residential sites and structures.

Policy R-4.2

**Tenants' Access to Information.** Ensure that multi-lingual information is made easily available to tenants regarding tenant's rights and rental housing maintenance requirements.

Policy R-4.3

**Fence Heights.** Allow taller fence heights in residential areas, where appropriate, to offer options in maintaining safety of neighborhoods.

Policy R-4.4

**Multi-Family Housing Design.** Multi-family housing development is scaled and designed to provide residents and neighbors with abundant natural light and privacy.

Policy R-4.5

**Noise Barriers.** Community-friendly and appropriately designed noise barriers that include public art should be constructed along the Metro Blue Line and railroad rights-of-way near residences to reduce noise impacts.

Policy R-4.6

**Indoor Air Quality.** Promote healthy indoor air quality through the use of zero- and low-Volatile Organic Compounds (VOC) materials, installation of air filtration systems, and other measures.

## General Plan Policies

Community Design

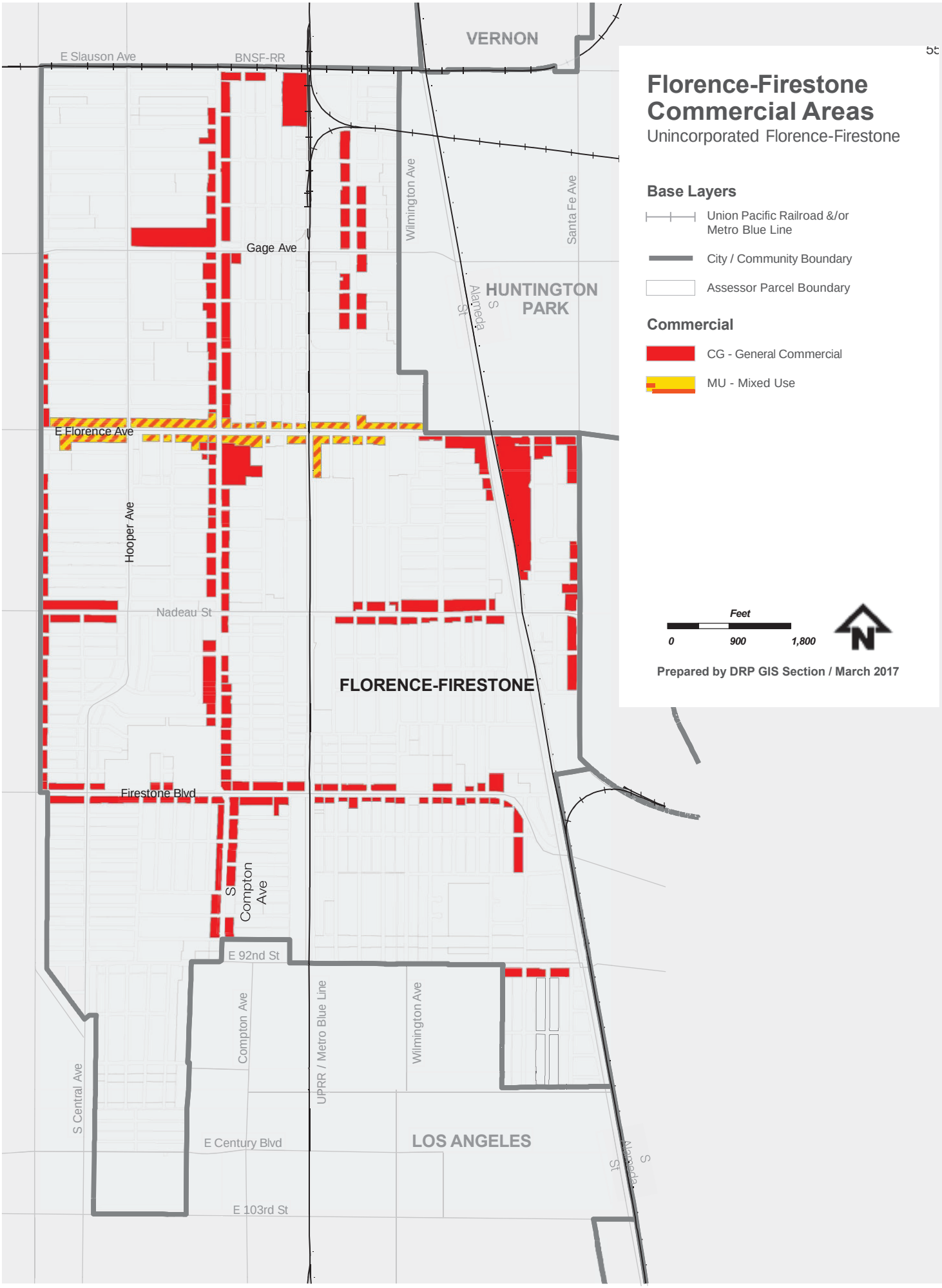
**Policy LU 10.3:** Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.

Housing Element, Equal Housing Opportunity

**Policy 5.3:** Enforce health, safety, building, and zoning laws directed at property maintenance as an ongoing function of the County government.

**Policy 6.1:** Invest public and private resources in the maintenance and rehabilitation of existing housing to prevent or reverse neighborhood deterioration.

**Policy 6.3:** Inspect multi-family rental housing (with five or more units), contract shelters, and voucher hotels on a regular basis to ensure that landlords are maintaining properties, and not allowing them to fall into disrepair.




# Florence-Firestone Commercial Areas

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Commercial

- CG - General Commercial
- MU - Mixed Use

Feet

0 900 1,800

N

Prepared by DRP GIS Section / March 2017

## Commercial Areas (C)



Florence Ave signage.

### Vision

Create vibrant commercial and mixed use areas that function as the connective fabric of the community, support a variety of commercial activities dispersed community-wide, provide an attractive and safe public realm, and identify Florence Mile as the community's "main street".

### Background

The commercial areas contain a mix of land uses including, commercial and residential, as well as three Metro Blue Line Stations (Slauson, Florence, and Firestone).

The primary commercial corridors of the community are:

**North/South**

- Central Avenue
- Compton Avenue

**East/West**

- Florence Ave
- Firestone Boulevard

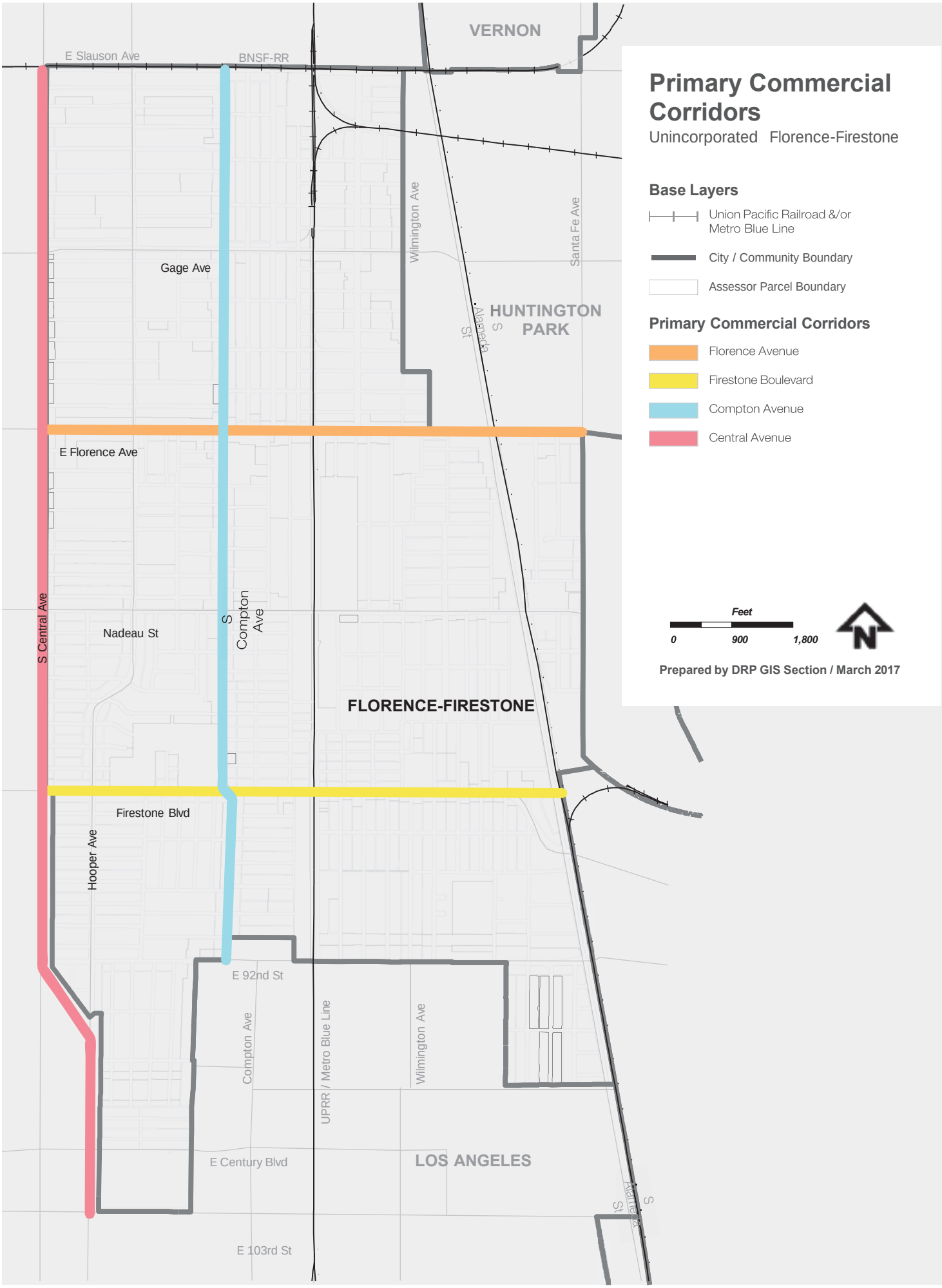

Fox Theater on Florence Avenue ca. 1933.
*Courtesy, California State Public Library*

Commercial land uses are also located along portions of Slauson, Holmes, and Gage Avenues, as well as Nadeau, Alameda and Santa Fe Streets. However, along these streets commercial uses do not make up the primary land use. There are residential uses, industrial uses, and/or public facilities in addition to commercial uses. The area bordered by Florence Avenue, Nadeau Street, and Compton and Graham Avenues, has a concentration of County services and public facilities with a mix of residential, commercial, and industrial uses.

Florence Avenue, known as the 'Florence Mile', has the greatest concentration of pedestrian and commercial activity, particularly between Graham and Compton Avenues, which includes the Florence Blue Line Station. Historically, the Florence Mile has been the primary shopping street in the community. Florence Avenue contained two movie theaters that were constructed in the 1930s and subsequently demolished in the 1960s. One theater stood on the site of the present Rite-Aid, which is not oriented to Florence Avenue, but rather creates a long, blank façade that has been a source of complaints by community members.



The Rite-Aid on Florence Avenue does not provide an entrance from Florence Avenue and is not oriented to the street.




# Primary Commercial Corridors

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Primary Commercial Corridors

- Florence Avenue
- Firestone Boulevard
- Compton Avenue
- Central Avenue

Feet

0 900 1,800

N

Prepared by DRP GIS Section / March 2017



Florence Avenue retail corridor near Holmes Avenue,1952.
*Photograph by Julius Shulman. Source: © J. Paul Getty Trust. Getty Research Institute, Los Angeles (2004.R.10).*

Today, Florence Avenue contains a mix of small, locally-owned businesses and national retailers providing a range of shopping options, but no entertainment uses. The diversity of retail options and commercial activity present on Florence Avenue is not distributed throughout other commercial areas of the community. Large parts of Firestone Boulevard, Central Avenue, and Compton Avenue do not have significant pedestrian activity, nor a variety of retail options or services to meet the community's needs. In addition, there is inconsistency in commercial structures' orientation to the street, with some properties maintaining a traditional urban form with storefronts built to the sidewalk, while others were converted to strip-mall development with parking adjacent to the sidewalk.

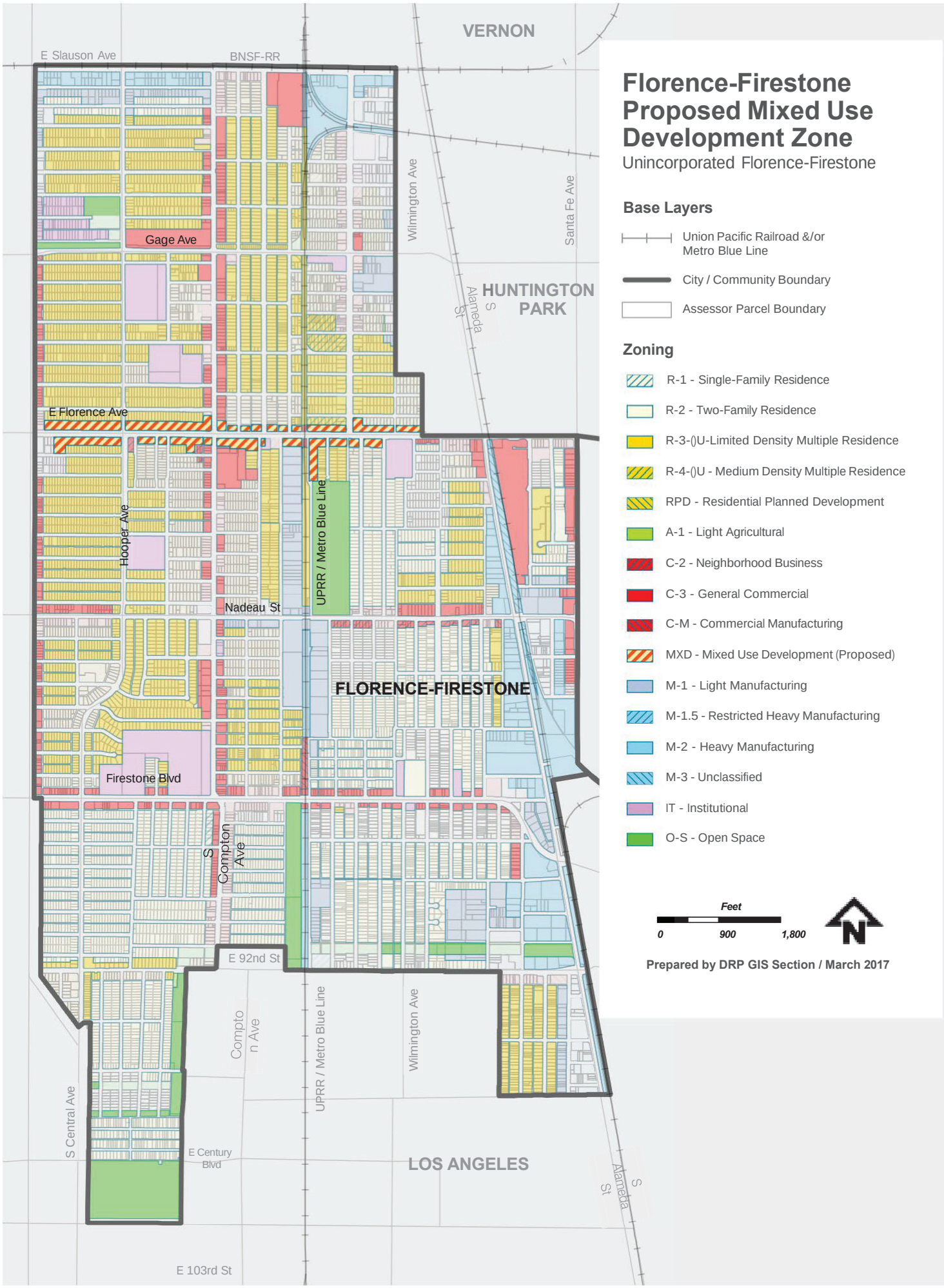
## Opportunities and Challenges

### Vibrant Commercial Districts

Revitalization of commercial areas is one primary objective of the plan. Improvements to existing buildings are vital to creating vibrant commercial districts. As many structures pre-date the 1960s, reinvestment in both privately-owned buildings and public infrastructure is needed to support and enhance the commercial areas.

Commercial areas contain locally-owned businesses that cater largely to local populations. With the presence of small and medium-sized locally owned businesses, there is an opportunity to nurture and support their growth. Some businesses, including Latin American specialty foods and furniture manufacturers, attract customers from the larger L.A. region. Providing assistance, access to capital, branding, façade improvements, and business support programs will enhance commercial corridors and support the local and regional draw of these businesses. These enhancements will provide a strong foundation to attract new businesses, increase retail options and services and retain existing commercial uses.

Community members have commented on the lack of gathering places, such as sit-down restaurants, entertainment venues, or outdoor seating areas within commercial developments. Further, no performance venues exist within the community. Incentivizing the inclusion of gathering spaces in commercial developments can add these types of spaces throughout the community. To further enhance the vibrancy of the commercial corridors and attract additional retailers, a public plaza with a performance space should be located near pedestrian activity.




# Florence-Firestone Proposed Mixed Use Development Zone

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Zoning

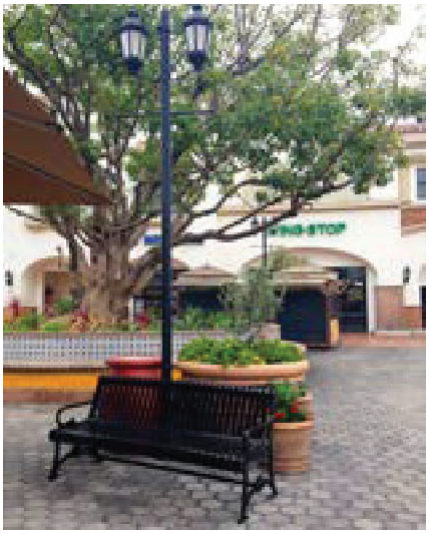
- R-1 - Single-Family Residence
- R-2 - Two-Family Residence
- R-3-()U-Limited Density Multiple Residence
- R-4-()U - Medium Density Multiple Residence
- RPD - Residential Planned Development
- A-1 - Light Agricultural
- C-2 - Neighborhood Business
- C-3 - General Commercial
- C-M - Commercial Manufacturing
- MXD - Mixed Use Development (Proposed)
- M-1 - Light Manufacturing
- M-1.5 - Restricted Heavy Manufacturing
- M-2 - Heavy Manufacturing
- M-3 - Unclassified
- IT - Institutional
- O-S - Open Space

Feet

0 900 1,800

N

Prepared by DRP GIS Section / March 2017



La Alameda Shopping Center, Florence Avenue.



La Florencita located on Florence Avenue, ca. 1952 was one of three movie theaters that existed in Florence-Firestone between the 1920s and 1960s.

*Source: © J. Paul Getty Trust. Getty Research Institute, Los Angeles (2004.R.10).*

Presently, community assets, public facilities, and services are centered in the blocks between Florence Avenue, Compton Avenue, Graham Avenue, and Nadeau Street. This area has a mix of residential, commercial, and industrial uses, providing a central concentration of activity that can integrate with the commercial areas and be considered for the development of a public gathering space. This area presents an opportunity to develop into an active and vibrant community center with a mix of uses, including residential, retail, parks, services, offices, and public facilities in a compact, walkable, and transit-oriented environment.

### Mix of Land Uses

Commercial areas have a mix of land uses with residential, retail, public facilities, and schools in proximity. This mix supports an opportunity for developing mixed-use buildings and activating commercial corridors throughout the community. Mixed-use buildings can provide retail, services, or public facilities on the ground floor and housing on upper stories to support diverse commercial activities and maintain an active street life.

The construction of residential development in the commercial areas will increase housing availability and can also attract a greater diversity of retail uses, services, and entertainment options. In addition, the presence of residents in commercial areas supports a vibrant commercial corridor and can enhance safety of the public realm especially when projects incorporate Crime Prevention Through Environmental Design (CPTED) elements such as increased lighting, visibility, and unobstructed windows.

### Pedestrian- and Transit-Friendly

Commercial corridors throughout the community have transit stops and stations with regional and local connections, including the Metro Blue Line and Metro bus routes. Current development in commercial areas is low-intensity, allowing future opportunities for mixed-use development near stations to support ridership, housing, and access to services for transit-dependent residents.

Improving the public realm and providing safe connections between transit stations, housing, activity areas, and public facilities will support activating commercial corridors. Commercial corridors can be further improved with streetscapes that promote a pedestrian-friendly environment and provide visible and safe public spaces. Street-facing retail incorporating windows and increased lighting, where feasible and appropriate, will further activate commercial corridors. Commercial areas can also be enhanced by thoughtful urban design

that helps create successful public and private spaces where people feel comfortable and fosters a sense of place.

## Goals and Policies

**Residential and Mixed-Use Projects.** As residential and mixed-use projects are encouraged on appropriate sites in the Commercial Areas, goals and policies from the Residential Areas element are applicable here.

### VIBRANT COMMERCIAL DISTRICTS

**GOAL C-1**
**Florence Avenue is the commercial "main street" of Florence-Firestone.**



La Alameda Shopping Center contains a gathering space fronting Florence Avenue.

Policy C-1.1

**Florence Mile Identity.** Create a sense of place, community identity, and beautify Florence Mile through public art interventions, and where appropriate, continuously maintained street trees, pedestrian amenities, downward directed lighting, distinctive cross-walk treatments, and organized programs and activities that celebrate Florence Mile and its rich history.

Policy C-1.2

**Development Near Florence Station.** Support the development of mixed-use buildings, diverse retail options, and community-service uses adjacent to the Metro Florence Blue Line station that contribute to the architectural quality of the community.



Example of a community marketplace structure and gathering space.
*Courtesy, Wormcast (Own work) [CC BY-SA 3.0 (creativecommons.org/licenses/by-sa/3.0)], via Wikimedia Commons.*

Policy C-1.3

**Community Marketplace.** Support creating a community marketplace that offers independent local craftsmen and specialty foods makers a venue to sell their goods and provides a gathering place for community members.

**GOAL C-2**
**Commercial and mixed use areas are vibrant centers of activity for community members to gather and interact.**

Policy C-2.1

**Catalyst Projects.** Promote public -private sector partnerships to identify and fund mixed-use catalyst projects that meet the needs of community members and positively contribute to a vibrant commercial area.

Policy C-2.2

**Incentivize Gathering Spaces.** Incentivize the inclusion of gathering spaces in commercial, mixed-use, and residential development through parking reductions, floor area ratio increases, or other relevant incentives.



Example of mixed-use multifamily housing and pedestrian-oriented development on a major corridor.

Policy C-2.3

**Activity Centers.** Develop pedestrian-friendly activity centers expressive of community identity near transit and public facilities that provide employment, housing, community services, a diversity of retail, and cultural amenities.

Policy C-2.4

**Incorporate Public Facilities in Commercial Centers.** Incorporate public facilities and/or public agency satellite offices that provide access to public information in active commercial centers.

Policy C-2.5

**Farmer's Market.** Establish a recurring farmer's market within the streets of the Florence-Firestone community or collocated at a public facility where appropriate and feasible.

**General Plan Policy**

Community Design

**Policy LU 10.11:** Facilitate the use of streets as public space for activities that promote civic engagement, such as farmers markets, parades, etc.

## MIX OF LAND USES

**GOAL C-3**

**Commercial and mixed use areas provide a diverse mix of high-quality retail, residential, and mixed-use development.**

Policy C-3.1

**Reduce Barriers to Changes of Use.** Promote economic adaptability and reduce barriers to change of use or renovation of existing buildings through simplified parking requirements and reductions in requirements that may inhibit adaptive reuse.

Policy C-3.2

**Shared Parking.** Facilitate and encourage shared parking between commercial uses and shared parking facilities for commercial and mixed use areas, such as the development of shared parking structures or other off-street parking facilities.

Policy C-3.3

**Mixed-Use Development.** Support development of mixed-use and residential development on commercial corridors, such as Florence Avenue, Central Avenue, Compton Avenue, Nadeau Street, Gage Avenue, and Firestone Boulevard.

Policy C-3.4

**Residential Development.** Promote the development of medium-density residential development to increase housing opportunities, including accessory dwelling units, and senior and affordable housing, where appropriate.

Policy C-3.5

**Incentivize Commercial Diversity.** Incentivize the establishment of uses that satisfy the daily needs and desires of the surrounding neighborhoods including, small and large-scale grocery stores, sit-down restaurants, diverse retail, entertainment venues, services, and cultural spaces.

Policy C-3.6

**Land Assembly.** Facilitate the development of small and undersized parcels, through parcel assembly, lot consolidation, or other means to support revitalization of commercial areas.



Example of pedestrian-oriented development and streetscape enhancements.

## PEDESTRIAN-& TRANSIT-FRIENDLY

### GOAL C-4

**Commercial and mixed use corridors are attractive, welcoming, and pedestrian-friendly.**

Policy C-4.1

**Commercial Corridor Enhancements.** Attract visitors, pedestrians, and investors to commercial areas by requiring buildings and entrances to orient to the sidewalk and by enhancing streetscapes and infrastructure to create a safe and aesthetically pleasing environment.

Policy C-4.2

**Streetscape Maintenance.** Maintain streetscape and infrastructure investments in the public realm and ensure use of high-quality, durable materials.

Policy C-4.3

**Artist/Designer Consultant for Public Realm Projects.** Incorporate consulting artists and/or designers in the public outreach, design, and construction of streetscapes, public realm infrastructure, beautification projects, and similar efforts to provide attractive, place-specific elements responsive to community needs and preferences.

Policy C-4.4

**Active Ground Floors.** Promote high-quality urban design and active ground floors through design standards, window transparency requirements, and a variety of allowed uses on major mixed use and commercial corridors that enhance the pedestrian experience.

Policy C-4.5

**Façade Beautification.** Support beautification of existing businesses and encourage redevelopment of building facades.

Policy C-4.6

**Architectural Elements.** Provide defining architectural elements and visual interest in new development and renovations to existing structures, including renovating long expanses of windowless walls along the street frontage.

Policy C-4.7

**Building Scale.** Require that the scale and massing of new development along major commercial corridors provides transitions in building height and bulk to promote compatibility with the surrounding built form.

Policy C-4.8

**Business Improvement Districts.** Provide support to the community organization-based efforts in revitalization and capacity development for commercial areas, including formation of a Business Improvement District (BID)



# Industrial Areas (I)



Industrial use on Alameda Street.


Industrial street in Florence-Firestone with litter and dumping in the right-of-way.

## Vision

Create a strong industrial land use sector through reinvestment in industrial areas, with businesses providing diverse job opportunities and operating as good neighbors.

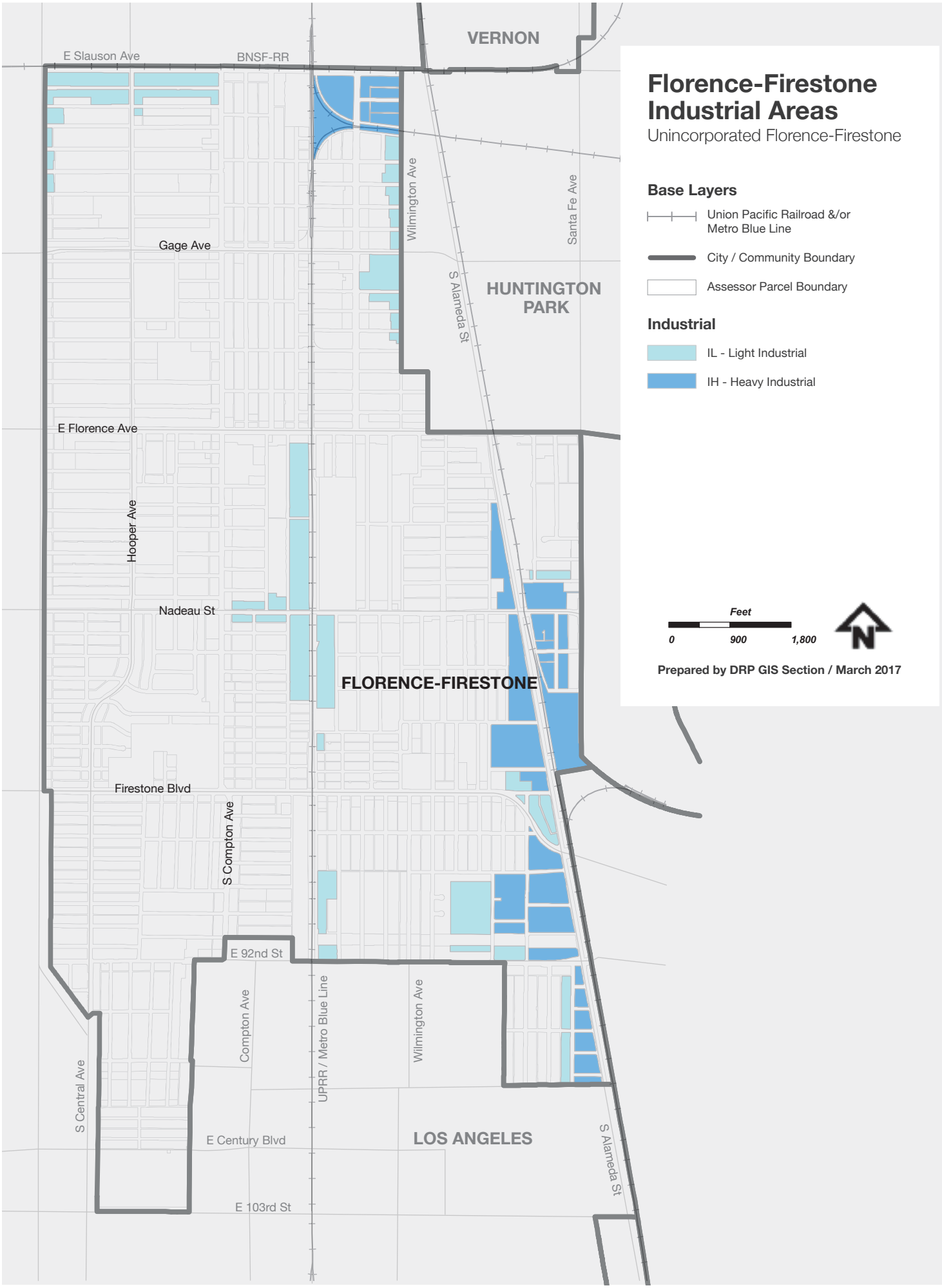
## Background

The industrial areas of Florence-Firestone are primarily clustered along Slauson Avenue, Wilmington Avenue, and Alameda Street, as well as along the Blue Line and railroad rights-of-way along Graham, Beach, and Maie Avenues. Existing uses generally consist of outside storage, warehouses, auto-related uses, and limited manufacturing. Auto-related and outdoor storage uses are the most prevalent industrial uses in the community.

The more intensive and impactful uses, which include materials recycling and auto-dismantling, are clustered along Alameda Street, also known as the Alameda Corridor, the largest industrial area in the community and one of the largest in the L.A. region. The Alameda Corridor is a below-grade rail corridor running 20 miles from downtown Los Angeles to the ports of Long Beach and Los Angeles, where a concentration of industrial uses are located in proximity to the industrial transportation corridor.

The industrial sites are aging, with more than 75% of the existing industrial buildings constructed prior to 1960. While some business are well-maintained, many others need reinvestment in and maintenance of facilities and operations. In addition, many sites do not comply with current development standards. Properties in the community are undersized for industrial facilities and operations, which commonly leads to overflow into the public rights-of-way. Vacant and underutilized properties are scattered throughout the area, however there is no mechanism currently to incentivize parcel assembly or lot consolidation of undersized parcels to encourage use of the vacant properties.

In Florence-Firestone, residences were built in proximity to industrial uses because the residential areas historically provided worker housing for the local industries, such as the Goodyear and Firestone Tire companies. Over the years, as industry shifted from traditional manufacturing to other forms of industry, and as the residential population increased, this adjacency has resulted in significant land use conflicts.




# Florence-Firestone Industrial Areas

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Industrial

- IL - Light Industrial
- IH - Heavy Industrial

Feet

0 900 1,800

N

**Prepared by DRP GIS Section / March 2017**



Industrial street with inoperable vehicles in the right-of-way.

## Opportunities and Challenges

### Revitalization and Capacity Development

Florence-Firestone contains historically industrial areas and provided a strong manufacturing base prior to deindustrialization (refer to the Community History section for a discussion of deindustrialization). While many industrial uses are located in the area, data from the 2010 Market Feasibility Analysis indicates that they generate less revenue than their counterparts in other areas of the county. A direct connection to the Alameda Corridor benefits growth and expansion of uses in appropriate locations in the community. Strategic reinvestment in the area by both public and private entities would contribute to supporting viable businesses with expansion potential, offering diverse employment opportunities, and enabling the transition to less impactful uses.

Investment in the public realm would considerably enhance the function and appearance of industrial areas, making them more attractive to establish new industrial development. Streets that are regularly cleaned and maintained provide a more welcoming street presence for businesses and make the area more attractive for new industrial development.

### Facility, Operations, and Environmental Improvements

The industrial areas contain small-scale businesses that help create a strong, positive entrepreneurial energy in the community. However, due to disinvestment throughout the industrial areas, upgrades to facilities and operations are needed. The businesses could greatly benefit from access to capital and funding to upgrade operations and facilities. This would benefit the surrounding community through reductions in environmental impacts including water runoff, particulate emissions, pollutant discharges, soil contamination, and resulting noises and odors. Residents near the most egregious business operators have complained about noise, odors, dust and vibration which can impact public health and the overall quality of life. By upgrading facilities and operations, current uses would improve property maintenance and compliance with development standards and environmental regulations.

### Land Use Conflicts and Impacts

The early development of worker housing next to industrial uses has resulted in significant land use conflicts and impacts over time. Additionally, the small size of industrial properties in the area and the prevalence of unpermitted subleasing to different tenants leads to business activities, littering, and inoperable vehicles obstructing the public rights-of-way. To limit land use

conflicts and renew investment in industrial operations, new standards for non-conforming uses are needed to satisfy specific performance measures. Reduced amortization periods are needed to address some of the long-standing impacts of industrial operations on the public realm and residential areas. Specific control measures for uses near residential areas, such as operation within a fully-enclosed building, should be required to prevent environmental pollution, noise, odors, and other nuisances that impact the quality of life for community members.

### Land Use Violations and Enforcement

A number of unpermitted uses and uses with expired permits operate in the area, contributing to elevated environmental impacts. This creates disincentives for other businesses to fully operate within the requirements of the law. Systematic and continuous coordination of code enforcement between County departments and other agencies is needed to fully address the impacts of unpermitted operations. Proactive enforcement in industrial areas targeting unpermitted uses would effectively cease unpermitted operations and deter future establishment of unpermitted uses.

## Goals and Policies

### REVITALIZATION AND CAPACITY DEVELOPMENT

**GOAL I-1**

**Industrial uses expand capacity for job creation and revenue-generation, where compatible with nearby land uses.**

Policy I-1.1

**Industrial Use Revitalization.** Support the growth, revitalization and diversification of industrial uses, and ensure compatibility with nearby land uses.

Policy I-1.2

**Alameda Corridor.** Focus industrial development efforts along the Alameda Corridor, where buffered from sensitive land uses and where there is space to accommodate upgrades to facilities and operations to meet the highest levels of environmental compliance.

Policy I-1.3

**Industrial Area Amenities.** Facilitate the establishment of retail services, small-scale retail kiosks, restaurants, pocket parks, and other needed amenities and services to enhance the availability of services and amenities for the workforce within industrial areas.



Industrial use in Florence-Firestone with well-maintained façade and fencing.



Industrial use on Slauson Avenue with landscaping and walls for buffering and screening.

Policy I-1.4

**Parcel Assembly.** Encourage assembly of small industrially-zoned parcels to support establishment, revitalization, and improved operations of industrial uses.

Policy I-1.5

**Business Improvement District.** Provide support to the community organization-based efforts in revitalization and capacity development for industrial areas, including formation of a Business Improvement District (BID).

## FACILITY, OPERATIONS, AND ENVIRONMENTAL IMPROVEMENTS

### GOAL I-2

**Industrial properties are well-maintained and improved over time.**

Policy I-2.1

**Buffers and Screening.** Require for new and existing industrial development, walls or fences made of durable and consistent materials, and screening consisting of well-maintained, drought-tolerant vegetation.

Policy I-2.2

**Buildings Along Rail Rights-of-Way.** Improve appearance of buildings fronting the railroad and Metro Blue Line rights-of-way through reinvestment in the structures, planting of vertical landscaping, and installation of public art on building facades facing the rail lines.

Policy I-2.3

**Requirements for Nonconforming Uses.** Require nonconforming uses (uses that do not conform to current zoning and/or development standards) to develop a phased compliance plan to implement site and operations improvements in compliance with current standards and operational and environmental requirements. Uses that cannot comply or have not implemented compliance program requirements should be subject to an abbreviated amortization period.

### GOAL I-3

**Industrial uses transition to technologies, industries, and operations that have minimal impact on the environment.**

Policy I-3.1

**Transition to Non-Polluting Industries.** Promote development of new uses and transition of existing uses to non-polluting industries.

Policy I-3.2

**Existing Use Compliance.** Require compliance of existing uses with the most current industrial emission control regulations.

Policy I-3.3

**Noise Emissions.** Enforce noise emission standards for equipment, operations, and vehicles used by industrial operations.

Policy I-3.4

**Hazardous Waste Management.** Require minimal use of hazardous chemicals and proper management of hazardous waste, including substituting hazardous chemicals used with less harmful alternatives, and legal disposal and elimination of untreated waste such as paints, oils, solvents, and other hazardous materials.

Policy I-3.5

**Best Management Practices.** Provide education programs for industrial operators that identify best management practices for operations and disposal of materials.

## LAND USE CONFLICTS AND IMPACTS

### GOAL I-4

**Industrial uses are good neighbors and avoid negative impacts on proximate uses.**

Policy I-4.1

**Improvements to Reduce Industrial Impacts.** Require improvements to industrial facilities, operations, and equipment to reduce aesthetic, social, and environmental impacts.

Policy I-4.2

**Mitigate Negative Impacts.** Require industrial uses to mitigate negative impacts, including but not limited to, noise, odor, air and water quality, and aesthetics, through site design and adherence to development standards, performance measures, and conditions of approval.

Policy I-4.3

**Discretionary Application Use Notification.** Notify community-based organizations concerned with equity and environmental quality, when applications for discretionary uses in industrial areas are filed.



Industrial use adjacent to residential use.



Example of an industrial operation fully enclosed in a building.

*Courtesy, The Voice of Hassocks (Own work) [CC0], via Wikimedia Commons*

Policy I-4.4

**Industrial Adjacent to Residential.** Require new and existing industrial uses adjacent to residential zoning to reduce impacts through measures such as additional setbacks and buffering, to effectively mitigate noise, vibration, and other negative impacts.

Policy I-4.5

**Truck Access.** Prohibit discretionary uses from using residential streets for truck access and parking.

Policy I-4.6

**Disproportionate Level of Impacts.** Discourage uses with potential to significantly increase cumulative pollution levels or negatively impact public health.

Policy I-4.7

**Compliance with Required Standards.** Require that industrial uses meet development standards, performance standards, and environmental requirements from all relevant agencies.

Policy I-4.8

**Enclosed Building.** Require that all impactful operations and activities in proximity to residential zoning and/or sensitive uses, be conducted in a fully enclosed building.

Policy I-4.9

**Subleasing.** To ensure that all operators on an industrial property with subleasees accommodate operations and requirements from all relevant agencies on-site, documentation of the subleasing agreement and site plans showing the area allocated to each operator should be required.

Policy I-4.10

**Coordinated Business and Environmental Permitting.** Facilitate compliance with environmental permitting requirements for potential applicants by clearly communicating permit requirements and regulations from all relevant agencies as early in the application process as possible.

Policy I-4.11

**Permit Application Progress.** Pending discretionary permit applications that do not make efficient progress to advance the permits and address corrections requested of County departments are subject to denial.

## LAND USE VIOLATIONS AND ENFORCEMENT

### GOAL I-5
**Industrial areas are clean, safe, and aesthetically pleasing.**

Policy I-5.1

**Proactive Zoning Enforcement.** Institute proactive enforcement programs targeting uses in violation of the permitting, licensing, and regulatory requirements of local and state agencies, initially prioritizing industrial areas near residential uses.

Policy I-5.2

**Clean Rights-of-Way.** Ensure that rights-of-way in industrial areas are free of litter and illegal dumping.

Policy I-5.3

**Enforce Operations On-Site.** Enforce requirements that industrial uses fully accommodate their operations on-site and do not operate in any public right-of-way.

Policy I-5.4

**Graffiti Removal.** Ensure removal of graffiti and trash from the railroad and Blue Line right-of-way adjacent areas.



Metro Blue Line and railroad rights-of-way with graffiti on walls.

# Connectivity (CN)

### Mobility and Connectivity

Mobility is the ability to move easily and freely from one place to another. The mode of travel can be by driving, biking, walking or public transit. Connectivity is the ability to use a combination of modes to move from one place to another. For example, if walking and taking public transit, connectivity is the ways and means that connect the pedestrian to the transit station. An active transportation system supports multiple modes of travel ensuring adequate facilities exist to support multiple travel options.

## Vision

Florence-Firestone contains a variety of transportation options, ensuring mobility is safe, efficient, and pleasant for all.

## Background

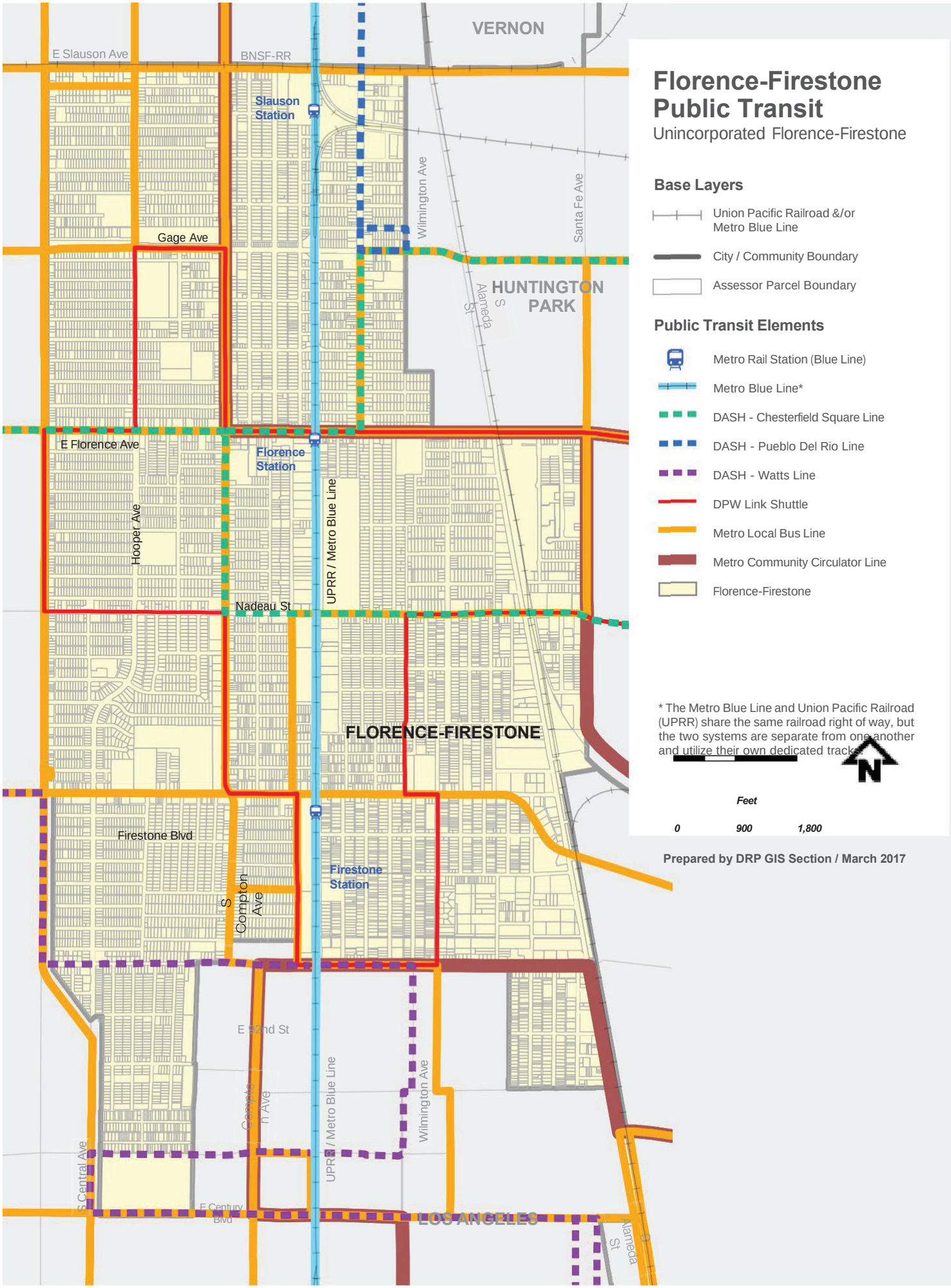
This section provides an overview of the transportation infrastructure in Florence-Firestone and establishes strategies for developing an efficient multimodal transportation network in the community. It assesses the current challenges and opportunities of the Florence-Firestone transportation system and offers policy guidance to reach the community's mobility goals.

Florence-Firestone is part of an extensive public transit network in Los Angeles comprised of light-rail, buses, and shuttles. The community is well served by Metro's regional public transportation options, including the Metro Blue Line and Metro buses. County of Los Angeles and City of Los Angeles operate the local buses, shuttles, and circulators in the area. Bike lanes and sidewalks provide other means for residents to get around. While many transportation options are available in the community, improvements to safety and connections between different modes of transportation are needed to facilitate access. Metro's recent focus on improving the first mile and last mile travel experience of the users is especially applicable to the light-rail stations and bus stops in Florence-Firestone.

## Transit

### Rail Connectivity

The Florence-Firestone community contains three Metro Blue Line stations consisting of the Slauson, Florence, and Firestone stations. The Metro Blue Line is a 22-mile rail line with 22 stations, connecting Downtown Los Angeles to Downtown Long Beach. It opened in 1990 and has an annual ridership of over 24.5 million passengers. The Metro Blue Line passes through Downtown Los Angeles, South Los Angeles, Florence-Firestone, Watts, Willowbrook, Compton, and Long Beach. It is one of six rail lines within the Metro Rail System. Users of the Blue Line can connect to the Green Line to the south and the Expo, Red, and Purple Lines to the north. Adjacent to the rail stations are connections to Metro buses, local municipal bus lines, and/or shuttles.




# Florence-Firestone Public Transit

Unincorporated Florence-Firestone

## Base Layers

- Union Pacific Railroad &/or Metro Blue Line
- City / Community Boundary
- Assessor Parcel Boundary

## Public Transit Elements

- Metro Rail Station (Blue Line)
- Metro Blue Line*
- DASH - Chesterfield Square Line
- DASH - Pueblo Del Rio Line
- DASH - Watts Line
- DPW Link Shuttle
- Metro Local Bus Line
- Metro Community Circulator Line
- Florence-Firestone

* The Metro Blue Line and Union Pacific Railroad (UPRR) share the same railroad right of way, but the two systems are separate from one another and utilize their own dedicated tracks.

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Feet

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Prepared by DRP GIS Section / March 2017

E 103rd St



Slauson Station, South Central Suite, East Los Streetscaper, Artists.
*Courtesy, Metro (Los Angeles County Transportation Authority).*



Florence Metro Station.
A Florence Moment, Ricardo Duffy, Artist.
*Courtesy, Metro (Los Angeles County Metropolitan Transportation Authority).*



Firestone Metro Station.

## Bus Service

Metro operates extensive bus routes in Florence-Firestone. Metro Local and Limited Stop buses operate on all major and secondary highways in Florence-Firestone, including east-west bus routes on Slauson Avenue, Gage Avenue, Florence Avenue and Firestone Boulevard and north-south bus routes on Central Avenue, Hooper Street, Compton Avenue, Santa Fe Street, and Alameda Street. The bus routes connect Florence-Firestone to the surrounding communities of South Los Angeles, Watts, Huntington Park, Walnut Park, and South Gate. The City of Los Angeles Department of Transportation (LADOT) operates three DASH bus routes in South Los Angeles, including Pueblo Del Rio, Chesterfield Square, and Watts, with stops near the Florence and Slauson Metro Blue Line stations. Los Angeles County operates the Link, a community shuttle service that connects residents and surrounding communities of Southeast Los Angeles and Walnut Park to Florence and Firestone Metro Blue Line stations.

## Slauson Station

Slauson Station is the northernmost Blue Line Station in Florence-Firestone. The station is within walking distance of residential neighborhoods, recreational facilities, and industrial properties, but access to the station is limited. The railroad right-of-way near the station entrance, the lack of pedestrian crossings on Slauson Avenue, and the elevated station platform limit station access. From the station travelers can connect to buses on Slauson Avenue, but the lack of pedestrian and bike amenities, such as bike lockers and racks, wayfinding signage, and shade structures, makes connectivity difficult for pedestrians and bikers. Infrastructure improvements, such as crosswalks along Slauson Avenue and bike lanes along the corridor, will promote an active transportation network, increase accessibility for bicyclists and pedestrians, enhance connectivity to the station, and address safety concerns raised by the separation of the elevated station from street-level.

## Florence Station

Of the three Blue Line stations, Florence Station is the most centrally located and the only at-grade station in Florence-Firestone. The station is located adjacent to the community's most active commercial area along Florence Avenue. The other primary commercial corridors, Compton and Central Avenues, are within a mile of the station. Single-family residential neighborhoods are located within a half-mile of the station. The Alameda Corridor is within a half-mile of the station. The community's second largest park, the 24.35-acre Franklin D. Roosevelt Park, is located within a block of the station.

Of the three stations, Florence Station is the most accessible from the surrounding area, but improving pedestrian access, bicycle paths, and wayfinding signage would further enhance mobility. The station has a 100-space surface parking lot, but limited pedestrian and bicycle amenities. The community is bisected by the rail and Metro Blue Line rights-of-way. Additional pedestrian crossings over the railway lines are needed to provide better connections between the station, park, commercial areas, and residential neighborhoods. Currently, there is one elevated bridge that provides pedestrian access over the railway.

### Firestone Station

Similar to the Slauson Station, the Firestone Station is situated above-grade, creating similar safety and visibility concerns for transit riders. The majority of land uses within a half-mile radius of the Firestone Station are residential neighborhoods. Firestone Boulevard is a commercial corridor, but it is less active with commercial and pedestrian activity than Florence Avenue. The Alameda Corridor is located a half mile to the east of the station. Washington Park is located next to the station, but is obscured by the station overpass. There are bike rack facilities at this station, but additional bike- and pedestrian-oriented amenities would improve connectivity.

## Transit Opportunties and Challenges

### Existing Transit Service

Mobility in Florence-Firestone is supported by the presence of three Metro Blue Line rail stations. The area around each station has been established as a Transit Oriented District (TOD) by the General Plan. TODs were established to promote pedestrian-friendly development near transit hubs. Implementation of TOD policies in Florence-Firestone would support active transportation and increase transit ridership.

### Transit Amenities

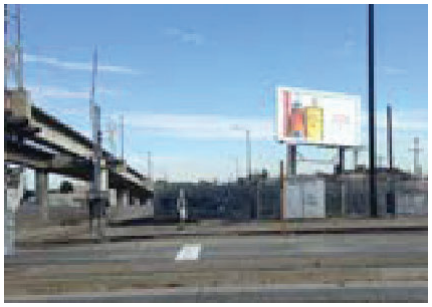
Despite the number of bus routes operating in Florence-Firestone, many bus stops lack benches, shelters, recycling and trash cans, and transit information. Rail stations in the community have some of these amenities but more amenities are needed, such as bicycle racks, security lighting, and landscaping.

### Safety Concerns

Public safety at the Metro Blue Line Stations in Florence-Firestone, especially at the Slauson and Firestone Stations, is identified as an issue by the community. The elevated platforms of these stations decrease visibility of activity at the stations and further contribute to safety concerns.

## Active Transportation

Active transportation is any form of mobility that only uses physical activity for movement. The most popular forms of active mobility are walking or bicycling, though other mobility means, such as a skateboard, roller skates, or a kick scooter are also forms of active transportation. This form of mobility increases the level of physical fitness in a community, reducing the rates of diabetes and obesity, while also reducing the consumption of greenhouse gases.



Poor pedestrian amenities at Slauson Station.

## Florence-Firestone Railway Crossing

- Slauson Avenue
- E. 60th Street
- Gage Avenue
- Florence Avenue
- E. 76th Street (Pedestrian Only)
- Nadeau Street
- Firestone Boulevard
- E. 92nd Street
- Century Boulevard

# Active Transportation

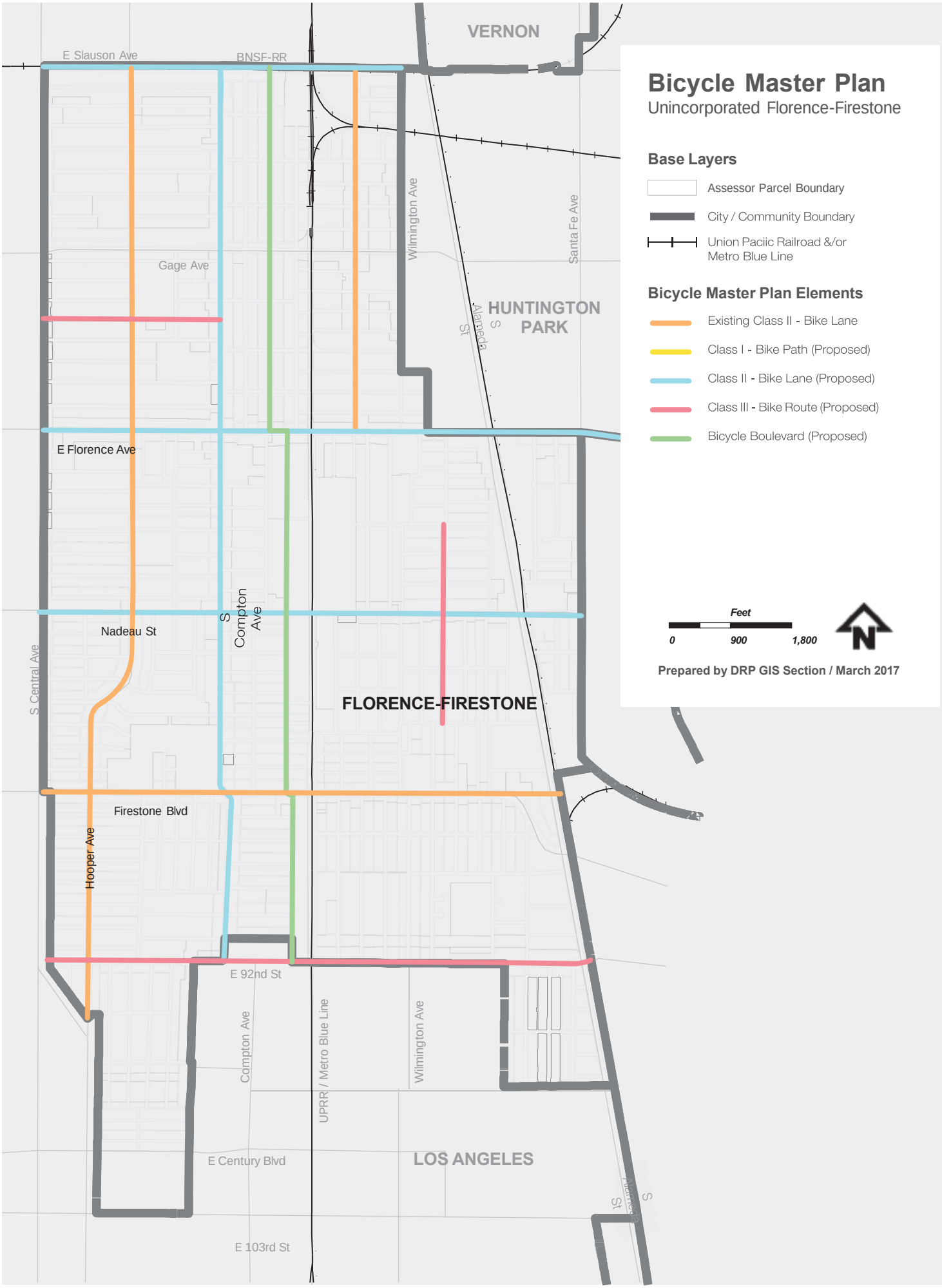
### Walking

Sidewalks in the Florence-Firestone community are mostly uniform, but can be enhanced with repair and widening near transit nodes and activity centers, such as commercial areas and public facilities, to improve pedestrian mobility. The pedestrian network currently lacks amenities such as, consistent placement of street trees, pedestrian-scale lighting, and wayfinding signage. These elements provide shade, improve safety, and orient pedestrians to transportation nodes and community resources. Installation of marked crosswalks at key intersections, where appropriate in the community, would further enhance the pedestrian network and improve mobility. A major impediment to pedestrian mobility is the Metro and freight rail lines which physically bisect the community in the north/south direction. This division is exacerbated by the lack of railway crossings. The only existing elevated railway crossing, a bridge connecting E. 76th Street and Graham Avenue near Roosevelt Park, is in poor condition and in need of replacement.




Intersection in Florence-Firestone.

Walkability needs to be prioritized to create a pedestrian-oriented community that has well-designed streets, a safe and enjoyable walking environment, and increased social interactions. Street amenities, such as street trees, benches, landscaping, pedestrian street lights, and minimal driveway curb cuts are needed to foster a pedestrian-friendly environment. Walkability is especially important in neighborhood commercial areas, along transit corridors, and near transit stations.




# Bicycle Master Plan

Unincorporated Florence-Firestone

## Base Layers

- Assessor Parcel Boundary
- City / Community Boundary
- Union Paciic Railroad &/or Metro Blue Line

## Bicycle Master Plan Elements

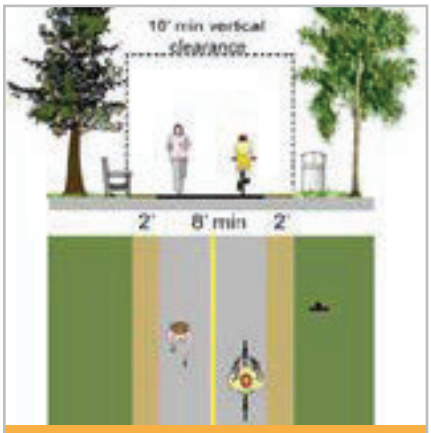
- Existing Class II - Bike Lane
- Class I - Bike Path (Proposed)
- Class II - Bike Lane (Proposed)
- Class III - Bike Route (Proposed)
- Bicycle Boulevard (Proposed)

Feet

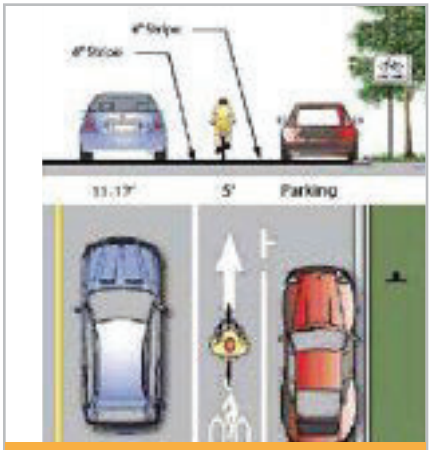
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Class 1: Bicycle Path



Class 2: Bicycle Lane



Class 3: Bicycle Route

## Bicycling

Florence-Firestone contains a limited number of bikeways. Though progress has been made to implement bike facilities in the community in accordance to the Los Angeles County Bicycle Master Plan, gaps in the bikeway network will remain until the projects proposed by the Bicycle Master Plan are fully completed. This results in some sidewalks being used as bicycle routes to avoid vehicular conflicts, impacting people's ability to easily connect to activity centers and other transportation modes.

### Bikeway Facility Types

#### Class 1: Bicycle Path

Bike paths, also called shared-use paths or multi-use paths, are paved rights-of-way for exclusive use by bicyclists, pedestrians, and other non-motorized modes of travel. They are physically separated from vehicular traffic and can be constructed in the roadway right-of-way or exclusive right-of-way. These facilities are often used for recreation, but also can provide important transportation connections.

#### Class 2: Bicycle Lane

Bike lanes are defined by pavement striping and signage used to allocate a portion of roadway for exclusive bicycle travel. Bike lanes are one-way facilitates on either side of a roadway. Bike lanes are located adjacent to a curb where no on-street parking exists. Where on-street parking is present, bike lanes are striped to the left side of the parking lane.

#### Class 3: Bicycle Route

Bike routes provide shared use with motor vehicle traffic within the same travel lane. Designated by signs, bikes routes provide continuity to other bike facilities or designate preferred routes through corridors with demand.

#### Bicycle Boulevards

Bicycle boulevards are local roads that have been enhanced with signage, traffic calming, and other treatments to prioritize bicycle travel. Bicycle boulevards are typically found on low-volume streets that can accommodate bicyclists and motorists in the same travel lanes, without specific bicycle lane delineation. The treatments applied to create a bicycle boulevard heighten motorist's awareness of bicyclists and slow vehicle traffic, making the boulevard more conducive to safe bicycle and pedestrian activity. Bicycle boulevards shall include signage, pavement markings, and traffic calming features, such as intersection treatments or traffic diversions. The specific treatments employed by a bicycle boulevard will be determined during project implementation based on input received from the public.

*Source: Los Angeles County Master Bicycle Plan, 2012*

**Table 13:** Los Angeles County Bicycle Master Plan, Florence-Firestone Area Existing and Planned Bikeways

| Status | Type | Street | From - To | Length (Miles) |
|---|---|---|---|---|
| Existing | Bike Lane | Holmes Avenue | Gage Avenue - Florence Avenue | 0.5 |
| Existing | Bike Lane | Holmes Avenue | Slauson Avenue - Gage Avenue | 0.5 |
| Existing | Bike Lane | Hooper Avenue | Slauson Avenue - 95th Street | 2.73 |
| Existing | Bike Lane | Firestone Boulevard | Central Avenue - Alameda Street | 1.43 |
| Planned | Bike Lane | Compton Avenue | Slauson Avenue - 92nd Street | 2.49 |
| Planned | Bike Blvd | Miramonte Boulevard | Slauson Avenue - Florence Avenue | 1 |
| Planned | Bike Route | E. 68th Street | Central Avenue - Compton Avenue | 0.5 |
| Planned | Bike Lane | Crockett Boulevard | 76th Place - 83rd Place | 0.55 |
| Planned | Bike Route | 92nd Street | Central Avenue - Alameda Street | 0.76 |
| Planned | Bike Lane | Slauson Avenue | Central Avenue - Alameda Street | 1.07 |
| Planned | Bike Lane | Florence Avenue | Central Avenue - Mountain View Avenue | 2.23 |
| Planned | Bike Blvd | Maie Avenue | Florence Avenue - 92nd Street | 1.5 |
| Planned | Bike Lane | Nadeau Street | Central Avenue - Santa Fe Avenue | 1.51 |
| Planned | Bike Lane | Broadway | Santa Fe Avenue - State Street | 1.07 |
| Planned | Bike Lane | Seville Avenue | Florence Avenue - Broadway | 0.52 |
| Planned | Bike Lane | Florence Avenue | Central Avenue - Mountain View Avenue | 2.23 |
| Planned | Bike Lane | Nadeau Street | Central Avenue - Santa Fe Avenue | 1.51 |
| Planned | Bike Lane | Slauson Avenue | Central Avenue - Alameda Street | 1.07 |

*Source: Los Angeles County Master Bicycle Plan, 2012*

### General Plan Highway Roadway Classification

Major Highway

This classification includes urban and rural highways that are of countywide significance and are, or are projected to be, the most highly traveled routes. These roads generally require four or more lanes of moving traffic, channelized medians and, to the extent possible, access control and limits on intersecting streets. In urban areas, the typical right-of-way width for these highways is 100 feet.

Secondary Highways

This classification includes urban and rural routes that serve or are planned to serve an area-wide or countywide function, but are less heavily traveled than major highways. Secondary highways also frequently act as oversized collector roads that feed the countywide system. In this capacity, the routes serve to remove heavy traffic from local streets, especially in residential areas. Access control, especially to residential property and minor streets, is desirable along these roads. In urban areas, secondary highways generally have four lanes of vehicular traffic on 80 feet of right-of-way. However, configuration and width may vary with traffic demand and existing conditions.

## Active Transportation Opportunities and Challenges

### Topography and Location

Florence-Firestone's flat topography supports residents who use active transportation, such as walking and biking. The community is also proximate to economic opportunities in the City of Los Angeles, Huntington Park, and South Gate. This proximity maximizes transportation options when reaching these locations, as the shorter travel distance provides opportunities to walk and bike to activity centers in adjacent jurisdictions.

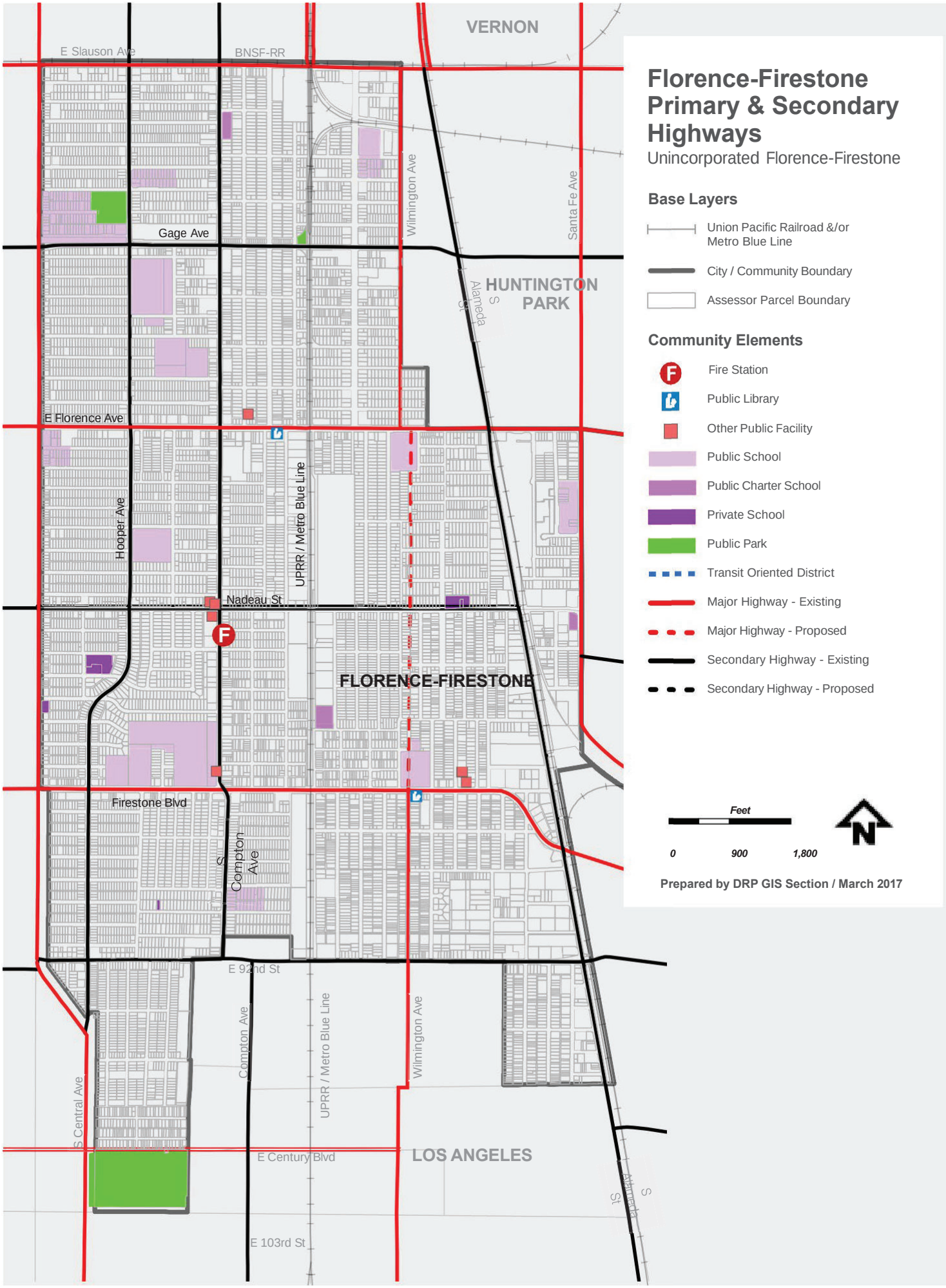
### Active Transportation Amenities

Infrastructure for community members who walk or bike should be expanded. Sidewalks on some street segments can be widened and repaired to better accommodate pedestrians. Installation of crosswalks, where appropriate, would help facilitate street crossings. The planting of consistent street trees and installation of shade structures, pedestrian-oriented lighting, and wayfinding signage on sidewalks would further enhance the pedestrian experience. Additional bike lanes and bike storage facilities would support the increasing level of biking in the community. ADA accessibility can also be improved or upgraded along the major corridors, particularly Firestone Boulevard and residential streets south of Firestone Boulevard.

## Complete Streets

### Vehicles and the Streetscape

The streets in Florence-Firestone are laid out in a grid pattern, with major and secondary highways providing primary vehicular and transit access to residents. The major highways that run west-east through Florence-Firestone include Slauson Avenue, Florence Avenue, and Firestone Boulevard. The west-east secondary highways include Gage Avenue, Nadeau Street, and E. 92nd Street. The major highways that run north-south through the community include Central Avenue and Wilmington Avenue. The secondary highways that run north-south through Florence-Firestone include Hooper Avenue, Compton Avenue, and Alameda Street.


VERNON
E Slauson Ave
BNSF-RR
Gage Ave
Wilmington Ave
Santa Fe Ave
HUNTINGTON PARK
S Alameda St
E Florence Ave
Hooper Ave
UPRR / Metro Blue Line
Nadeau St
FLORENCE-FIRESTONE
Firestone Blvd
S Compton Ave
E 92nd St
Compton Ave
UPRR / Metro Blue Line
Wilmington Ave
S Central Ave
E Century Blvd
LOS ANGELES
S Alameda St
E 103rd St
Florence-Firestone Primary & Secondary Highways
Unincorporated Florence-Firestone
Base Layers
Union Pacific Railroad &/or Metro Blue Line
City / Community Boundary
Assessor Parcel Boundary
Community Elements
Fire Station
Public Library
Other Public Facility
Public School
Public Charter School
Private School
Public Park
Transit Oriented District
Major Highway - Existing
Major Highway - Proposed
Secondary Highway - Existing
Secondary Highway - Proposed
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Prepared by DRP GIS Section / March 2017

Florence-Firestone Roadway Classification

| Major Highways | |
|---|---|
| **West-East** | **North-South** |
| • Slauson Avenue<br>• Florence Avenue<br>• Firestone Boulevard | • Central Avenue<br>• Wilmington Avenue |
| **Secondary Highways** | |
| **West-East** | **North-South** |
| • Gage Avenue<br>• Nadeau Street<br>• E. 92nd Street | • Hooper Avenue<br>• Compton Avenue<br>• Alameda Street |

Within Florence-Firestone, commercial uses are predominately located along major travel corridors. Industrial uses are largely concentrated in the southeastern quadrant of the community especially along the Alameda corridor. Residential areas are comprised of single and multi-family housing. Although the street network was designed to accommodate vehicular travel over active transportation and transit options, Florence-Firestone has high transit ridership.

## Complete Streets

According to Caltrans, "complete street is a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility." Whether someone chooses to walk, bicycle, take transit, or drive, a complete street should meet their needs. In 2007, the State of California adopted the "Complete Streets Act," which requires all local jurisdictions in the State, including Los Angeles County, to plan roadways to meet the needs of all users. The policies in this section are designed to achieve the goal of Complete Streets as outline in the Los Angeles County General Plan.

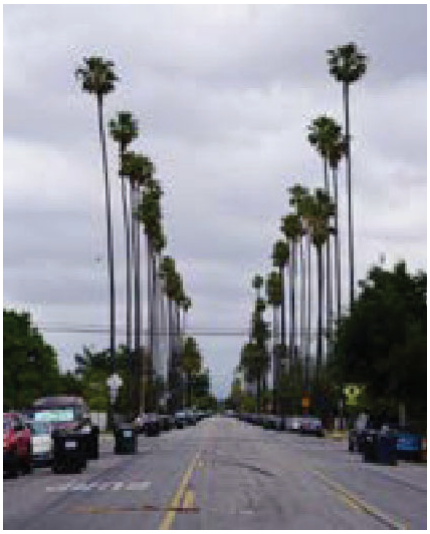
### Green Streets

A “green street” is a stormwater management approach that incorporates soil, vegetation, and engineering to filter stormwater runoff from streets and sidewalks. Green streets are designed to capture rainwater where it falls, while a traditional street would direct stormwater from impervious surfaces into storm sewer systems that discharge directly into surface waters, rivers, and streams. Green streets help protect water quality in streams and rivers by removing pollutants. They improve air quality, replenish groundwater supplies, and provide green connections between parks and open space.

*Source: United States Environmental Protection Agency*

### Road Diets

A Road Diet reduces the number of vehicle lanes to improve safety or provide space for alternate modes of travel. The extra space created through a road diet can be used to widen sidewalks, establish bike lanes, provide additional parking, add landscape medians, or dedicated turn lanes. This space could also be used to enhance community green space and the urban tree canopy.



Wide street in Florence-Firestone.

## Complete Streets Opportunities and Challenges

### Rights-of-Way

Major commercial corridors in Florence-Firestone, as well as some residential streets, have wide rights-of-way which provide opportunities to place additional active transportation infrastructure, including sidewalk widening, dedicated bike lanes, and landscaped medians. Wide streetscapes also provide the opportunity to implement “green street” infrastructure for stormwater management. Hooper Avenue, Holmes Avenue, Miramonte Boulevard, Nadeau Street, Compton Avenue, and Crockett Boulevard have potential for such improvements.

### Safety

Community members who walk and bike in Florence-Firestone are concerned about safety issues stemming from unsafe driver behavior, crime, and gang activity. Unsafe driver behavior is a leading cause of collisions, including pedestrian fatalities. Vehicle collisions, especially along Firestone Boulevard and Compton Avenue, are of high concern. Traffic congestion along major and secondary highways in the community has also led to increased speeding on residential streets, as drivers try to avoid congestion.

### Vision Zero

"Vision Zero" is a strategy to eliminate traffic fatalities and severe injuries while increasing safe, healthy, equitable mobility for all (VisionZeroNetwork)." These strategies include engineering, enforcement, education, and evaluation approaches, which require collaboration between sectors including public health, engineering, communications, law enforcement, and community stakeholders. In early 2017, Los Angeles County took steps to implement Vision Zero initiatives to protect lives, reduce the severity of injuries, and improve the quality of life in unincorporated communities.



Limited street parking available on a residential street in Florence-Firestone.

Crime is a concern both on the community's streets, as well as the elevated Metro Blue Line Stations (Firestone Station and Slauson Station). Another safety concern is related to the upkeep of alleys in the community. Many of the residential areas have alleys that provide secondary access to homes. Some alleys are noted places for illegal dumping, graffiti, and crime.

## Parking

### Lack of Parking

There is limited public parking along commercial corridors in Florence-Firestone and residential areas in the community are often impacted by parking. Parking impacts on residential streets stem from overflow parking from commercial uses, as well as over-crowded housing conditions that result in additional parked vehicles on the street. In industrial areas, the prevalence of inoperable parked vehicles in the public right-of-way also leads to similar negative parking impacts. The pedestrian and physical character of an area plays a significant role in the community's parking environment. Policies and implementation steps are needed to counteract parking impacts.

## Goals and Policies

### A COMPREHENSIVE TRANSIT SYSTEM

**GOAL CN-1**

**The transportation network, including bus and rail stations and corridors, are attractive, comfortable, safe, and efficient.**

Policy CN-1.1

**Rail Station Safety and Beautification.** Beautify and ensure safety at transit stations in Florence-Firestone by addressing safety concerns regarding limited visibility at elevated stations, and using amenities such as street trees, seating, shade structures, public art, or other methods to improve aesthetics while maximizing visibility.

### USEFUL ACTIVE TRANSPORTATION NETWORKS

**GOAL CN-2**

**The pedestrian and bicycle networks in Florence-Firestone are comprehensive, accessible, safe, pleasant to use, clearly demarcated, and connective to activity centers.**

Policy CN-2.1

**Pedestrian Connections.** Increase and improve pedestrian connections around Slauson, Florence, and Firestone transit stations through the implementation of

active transportation infrastructure, such as crosswalks, widened sidewalks, pedestrian-scale street lighting, wayfinding signage, street trees, shade structures, and other elements as needed and where appropriate. *(Refer to Complete Streets and Active Transportation Design policies in the Mobility Element of the General Plan for more information.)*



Wayfinding signage located at Martin Luther King Jr. Community Hospital.
*Courtesy, Daryl Koonce*

Policy CN-2.2

**Street Trees.** Expand the use of street trees and lighting to provide an inviting walking environment and shade, especially on Nadeau Street, Santa Fe Avenue, Slauson Avenue, Graham Avenue, and Crockett and Firestone Boulevards.

Policy CN-2.3

**Urban Trails.** Create active transportation corridors through the built environment by designating and increasing the visibility of urban trails, bikeways, and multi-use pathways, through the conversion of existing rights-of-way, under-utilized land (such as public utility right-of-ways), and access roads.

Policy CN-2.4

**Bicycle Amenities.** Increase convenient and safe bicycle use in Florence-Firestone by installing bicycle racks and lockers along major corridors and at locations with high levels of bicycle traffic, such as schools, parks, businesses, mixed-use housing, and transit hubs.

Policy CN-2.5

**Bikeshare and Micromobility Systems.** Expand Metro's bike share system and encourage private bike share and micromobility vendors to establish hubs near transit stations and along commercial corridors.

Policy CN-2.6

**Sustainable Greening.** Require private development to improve overall greening through installation of St trees and public realm landscaping that supports shade and climate resiliency.

### General Plan Policies

Complete Streets

**Policy M 1.1:** Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.

**Policy M 1.2:** Ensure that streets are safe for sensitive users, such as seniors and children.

Active Transportation Design

**Policy M 2.1:** Provide transportation corridors/networks that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible.

**Policy M 2.2:** Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following street designs, whenever appropriate and feasible:

- Lane width reductions to 10 or 11 feet in low speed environments with a low volume of heavy vehicles.
- Wider lanes may still be required for lanes adjacent to the curb, and where buses and trucks are expected.
- Low-speed designs.
- Access management practices developed through a community-driven process.
- Back in angle parking at locations that have available roadway width and bike lanes, where appropriate.

**Policy M 2.3:** Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following intersection designs, whenever appropriate and feasible:

- Right angle intersections that reduce intersection skew.
- Smaller corner radii to reduce crossing distances and slow turning vehicles.
- Traffic calming measures, such as bulb-outs, sharrows, medians, roundabouts, and narrowing or reducing the number of lanes (road diets) on streets.
- Crossings at all legs of an intersection.
- Shorter crossing distances for pedestrians.
- Right-turn channelization islands. Sharper angles of slip lanes may also be utilized.
- Signal progression at speeds that support the target speed of the corridor.
- Pedestrian push buttons when pedestrian signals are not automatically recalled.
- Walk interval on recall for short crossings.
- Left-turn phasing.
- Prohibit right turn on red.
- Signs to remind drivers to yield to pedestrians.

**Policy M 2.4:** Ensure a comfortable walking environment for pedestrians by implementing the following, whenever appropriate and feasible:

- Designs that limit dead-end streets and dead-end sidewalks.
- Adequate lighting on pedestrian paths, particularly around building entrances and exits, and transit stops.
- Designs for curb ramps, which are pedestrian friendly and compliant with the American Disability Act (ADA).
- Perpendicular curb ramps at locations where it is feasible.
- Pedestrian walking speed based on the latest standard for signal timing. Slower speeds should be used when appropriate (i.e., near senior housing, rehabilitation centers, etc.)
- Approved devices to extend the pedestrian clearance times at signalized intersections.
- Accessible Pedestrian Signals (APS) at signalized intersections.
- Pedestrian crossings at signalized intersections without double or triple left or right turn lanes.
- Pedestrian signal heads, countdown pedestrian heads, pedestrian phasing and leading pedestrian intervals at signalized intersections.
- Exclusive pedestrian phases (pedestrian scrambles) where turning volume conflicts with very high pedestrian volumes.
- Advance stop lines at signalized intersections.
- Pedestrian Hybrid Beacons.
- Medians or crossing islands to divide long crossings.
- High visibility crosswalks.
- Pedestrian signage.
- Advanced yield lines for uncontrolled crosswalks.
- Rectangular Rapid Flashing Beacon or other similar approved technology at locations of high pedestrian traffic.
- Safe and convenient crossing locations at transit stations and transit stops located at safe intersections.

**Policy M 2.5:** Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:

- Bicycle signal heads at intersections.
- Bicycle signal detection at all signalized intersections.
- Wayfinding signage.
- Road diet techniques, such as lane narrowing, lane removal, and parking removal/restriction.

**Policy M 2.8:** Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.

**Policy M 2.9:** Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features.

**Policy M 2.10:** Encourage the provision of amenities, such as benches, shelters, secure bicycle storage, and street furniture, and comfortable, safe waiting areas near transit stops.

**Policy M 2.11:** In urban and suburban areas, promote the continuity of streets and sidewalks through design features, such as limiting mid-block curb cuts, encouraging access through side streets or alleys, and promoting shorter block lengths.

Land Use and Transportation

**Policy M 5.1:** Facilitate transit-oriented land uses and pedestrian-oriented design, particularly in the first-last mile connections to transit, to encourage transit ridership.

**Policy M 5.3:** Maintain transportation right-of-way corridors for future transportation uses, including bikeways, or new passenger rail or bus services.

## COMPLETE STREETS

**GOAL CN-3**

**Streets and sidewalks meet the needs of pedestrians, bicyclists, transit users, and motorists.**

Policy CN-3.1

**Safety Campaigns.** Provide and distribute information to the public on mobility safety for all mode users, including motorists, pedestrians, bicyclists, and transit users.

Policy CN-3.2

**Focused Enforcement.** Enforce speeding and traffic-related restrictions near schools and other activity centers, with the intent to dissuade dangerous driving behavior.

Policy CN-3.3

**Car Sharing and Carpooling.** Support initiatives and programs to expand car sharing and carpooling opportunities to Florence-Firestone residents.

Policy CN-3.4

**Circulation Efficiency.** Monitor the Florence-Firestone circulation system to ensure that travel across modes is efficient and properly connective. *(Refer to Transit Efficiency, Multimodal Transportation and Travel Demand Management policies in the Mobility Element of the General Plan for more information)*

Policy CN-3.5

**Sidewalk Zones.** Implement the County of Los Angeles Transit-Oriented District Toolkit sidewalk zones through private development improvements, including frontage zone, pedestrian zones, and furniture zone to organize the sidewalk space and support streetscape amenities.

Policy CN-3.6

**Implement a Safe System Approach to Road Safety.** Prioritize infrastructure improvements that enhance safety for vulnerable users such as those on foot, on bike, children, and seniors.

### General Plan Policies

Transit Efficiency Multimodal Transportation

**Policy M 4.1:** Expand transportation options that reduce automobile dependence.

**Policy M 4.2:** Expand shuttle services to connect major transit centers to community points of interest.

**Policy M 4.3:** Maintain transit services within the unincorporated areas that are affordable, timely, cost-effective, and responsive to growth patterns and community input.

**Policy M 4.4:** Ensure expanded mobility and increase transit access for underserved transit users, such as seniors, students, low income households, and persons with disabilities.

**Policy M 4.5:** Encourage continuous, direct routes through a connected system of streets, with small blocks and minimal dead ends (cul-de-sacs), as feasible.

**Policy M 4.8:** Provide and maintain appropriate signage for streets, roads and transit.

**Policy M 4.9:** Ensure the participation of all potentially affected communities in the transportation planning and decision-making process.

**Policy M 4.10:** Support the linkage of regional and community-level transportation systems, including multimodal networks.

**Policy M 4.11:** Improve the efficiency of the public transportation system with bus lanes, signal prioritization, and connections to the larger regional transportation network.

**Policy M 4.12:** Work with adjacent jurisdictions to ensure connectivity and the creation of an integrated regional network.

**Policy M 4.13:** Coordinate with adjacent jurisdictions in the review of land development projects near jurisdictional borders to ensure appropriate roadway transitions and multimodal connectivity.

Innovative Street Design

**Policy M 3.3:** Complete the following studies prior to the implementation of innovative design concepts:

- An analysis of the current and future context of the community and neighborhood in which they are proposed;
- A balanced assessment of the needs of all users and travel modes (i.e., pedestrian, bicycle, transit, vehicular, and equestrian, where appropriate);
- A technical assessment of the operational and safety characteristics for each mode; and
- A consistency check with transportation network plans, including the Highway Plan, Bicycle Master Plan, and Community Pedestrian Plans.

Travel Demand Management

**Policy M 4.15:** Reduce vehicle trips through the use of mobility management practices, such as the reduction of parking requirements, employer/institution based transit passes, regional carpooling programs, and telecommuting.

Transportation Funding

**Policy M 5.4:** Support and pursue funding for the construction, maintenance and improvement of roadway, public transit, and equestrian, pedestrian and bicycle transportation systems.

Environmentally Sensitive Transportation Design

**Policy M 7.1:** Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.

## CONNECTIVE COMMUNITY PARKING

**GOAL CN-4**

**Parking throughout the community is adequate, compliant with all applicable regulations, and is connective to other transportation modes.**

Policy CN-4.1

**Neighborhood Parking.** Ensure that parking in residential neighborhoods is orderly and complies with all applicable regulations.

Policy CN-4.2

**Parking Lots.** Design surface parking lots to accommodate pedestrians, bicyclists, and motorists.

Policy CN-4.3

**TOD Parking Requirements.** Reduce parking requirements for projects located within the Transit Oriented Districts, and support strategies to allow alternative parking proximate to transit centers, such as underutilized vacant lots.

Policy CN-4.4

**Shared Off-Street Parking.** Design surface parking lots to accommodate pedestrians, bicyclists, and motorists.

Policy CN-4.5

**Right-of-Way Enforcement.** Enforce requirements that commercial and industrial uses need to accommodate all business activities on-site and not in the public right-of-way.

### General Plan Policies

Goods Movement

**Policy M 6.4:** Minimize noise and other impacts of goods movement, truck traffic, deliveries, and staging in residential and mixed-use neighborhoods.

Land Use and Transportation

**Policy M 5.2:** Implement parking strategies that facilitate transit use and reduce automobile dependence.

## Transit Oriented Districts (TD)

### Transit Oriented District (TOD)

Transit Oriented Districts (TODs) are areas where the County encourages infill, pedestrian-friendly, and community-serving development within a ½-mile radius of transit stations to encourage walking, bicycling, and transit use. The TODs will be implemented by a TOD specific plan, or similar mechanism, with standards, regulations that address infrastructure, access and connectivity, supportive land uses, pedestrian improvements, and safety.

### Vision

Create vibrant TODs with high quality architecture, mixed-use development at transit nodes, transit-accessible housing, job-generating uses, community services, a welcoming public realm, and a safe and beautiful active transportation network.

### Background

Florence-Firestone has three Metro Blue Line Stations (Slauson, Florence, and Firestone Stations) and three Transit Oriented Districts (TOD) designated by the General Plan. The TODs encompass the area within a half-mile radius of each Metro Blue Line station, which amounts to 52% of all land within the community. Existing land uses in the TOD areas generally contain a mix of low- to medium-density residential, followed by one-story commercial structures, and industrial properties. Litter is an issue along the Metro Blue Line right-of- way and many industrial uses along the railroad right-of-way do not have well maintained fencing, negatively impacting the aesthetics of the area.

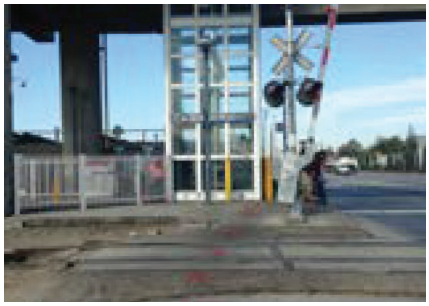
Much of the community is within walking distance to Metro Blue Line stations and bus stops. Around 30% of residential areas, 43% of commercial areas, and 24% of industrial areas are located within a one-half mile of the Metro Blue Line Stations. While, 73% of residential, 99% of commercial, and 87% of industrial areas are located within one-quarter mile of a bus stop. As such, transit is heavily used in this community. Existing public infrastructure can be enhanced to support increasing levels of active transportation and improved connectivity between existing uses.

The public realm in the Slauson, Florence, and Firestone Station TOD areas contains little landscaping, limited pedestrian and biking amenities, and limited connections to bikeways. Sidewalks in TOD areas should be widened to accommodate increases in pedestrian activity and access to transit services, especially as higher-intensity development is directed to these areas. Further, users have reported safety concerns at the elevated Slauson and Firestone Stations in part due to their disengagement at the street-level.

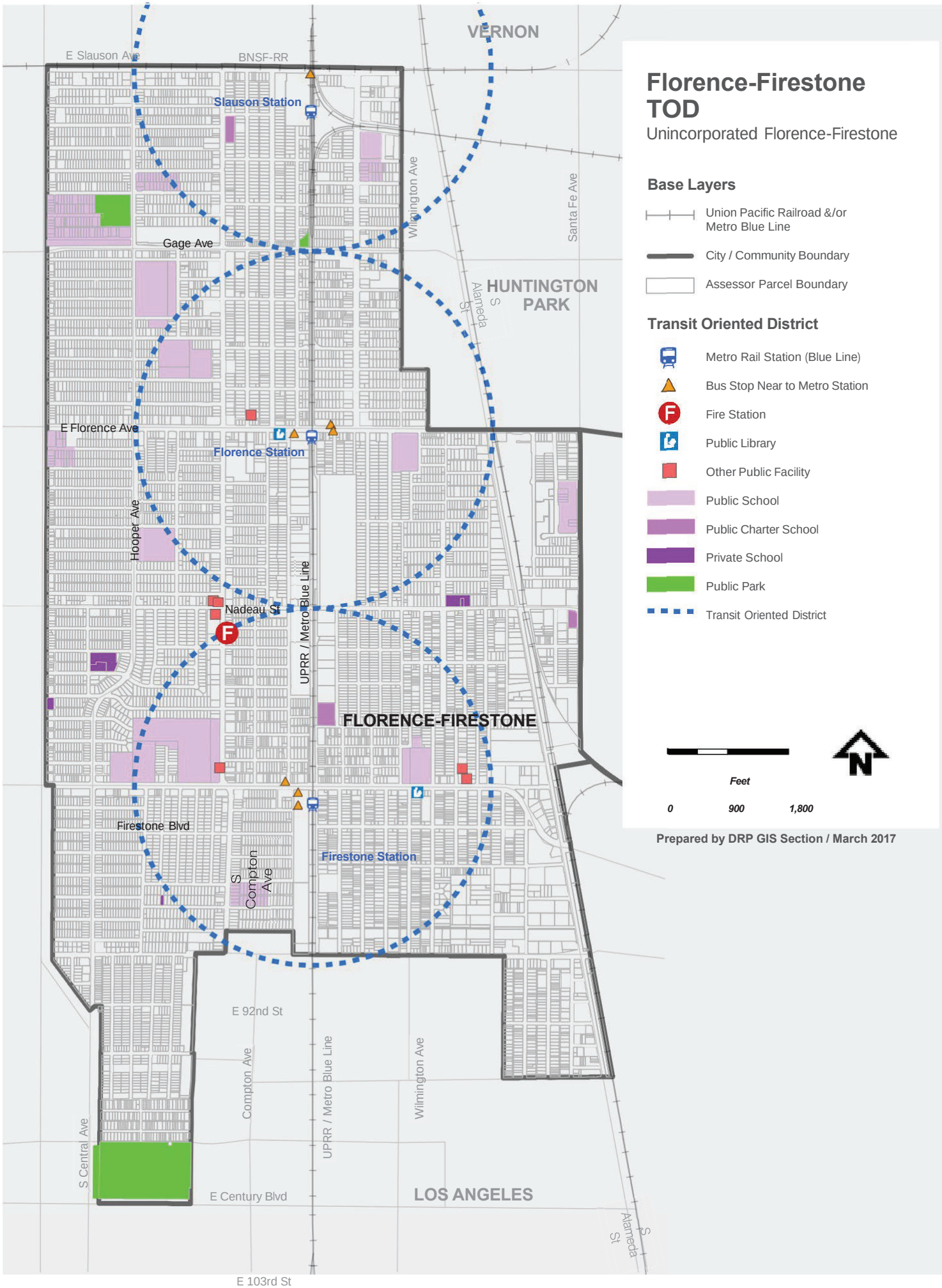
This TOD section primarily creates policies and addresses issues related to land uses within TOD areas. The Mobility section addresses other aspects of TODs related to active transportation, connectivity, and transit accessibility.



Area around Slauson Metro Station.



Slauson Station pedestrian access involves an at-grade railroad crossing to enter the elevated Blue Line platform.


VERNON
E Slauson Ave
BNSF-RR
Slauson Station
Wilmington Ave
Santa Fe Ave
Gage Ave
HUNTINGTON PARK
S Alameda St
E Florence Ave
Florence Station
Hooper Ave
UPRR / Metro Blue Line
Nadeau St
FLORENCE-FIRESTONE
Firestone Blvd
Firestone Station
S Compton Ave
E 92nd St
Compton Ave
Wilmington Ave
S Central Ave
E Century Blvd
LOS ANGELES
S Alameda St
E 103rd St
Florence-Firestone TOD
Unincorporated Florence-Firestone
Base Layers
Union Pacific Railroad &/or Metro Blue Line
City / Community Boundary
Assessor Parcel Boundary
Transit Oriented District
Metro Rail Station (Blue Line)
Bus Stop Near to Metro Station
Fire Station
Public Library
Other Public Facility
Public School
Public Charter School
Private School
Public Park
Transit Oriented District
Feet
0
900
1,800
N
Prepared by DRP GIS Section / March 2017



Florence Station Metro public art project.



Firestone Station elevated platform.



Florence Station is the only Blue Line station located at street-level and has a great opportunity to safely connect to the surrounding areas.

### Slauson Station

Slauson Station is adjacent to industrial uses located to the east and west, with land dedicated for railroad rights-of-way to the north of the station. The areas around the station are negatively impacted by litter, poor drainage, and poor landscaping. The presence of freight activity and infrastructure results in conflicts with transit riders and community members navigating the area.

Residential uses are located to the southwest and east, consisting mostly of low-density structures. The Augustus F. Hawkins Park, in the City of Los Angeles, is located north of the station, but lacks a safe, direct pedestrian connection from the station or neighborhoods south of Slauson Avenue.

There is a general lack of pedestrian-oriented and community-serving uses, such as small-scale retail and restaurants, that a TOD designated area would encourage. Further, Slauson Avenue contains vacant properties in both commercial and industrially zoned areas, detracting from the establishment of a pedestrian-friendly environment.

### Florence Station

The land uses directly adjacent to Florence Station include a Metro surface parking lot to the east and a carwash and parking area to the west, detracting from the pedestrian-friendly uses encouraged by TOD area designations. Roosevelt Park runs north/south adjacent to the Metro Blue Line and Florence Station, but clear connecting pathways between the park and the station are lacking.

Land uses in the TOD area consist of residential uses on side streets, commercial uses along Florence Avenue, and industrial uses south along Maie Avenue. Two elementary schools also exist in the area. Farther west along Florence Avenue, many commercial businesses draw users and pedestrian activity, however development is not consistently pedestrian-oriented. Florence Avenue is one of the main pedestrian and vehicular east/west access points across the railroad and Metro Blue Line rights-of-way. Active transportation enhancements in this area can significantly improve community-wide connectivity.

### Firestone Station

Land uses around Firestone Station include housing with a range of residential densities on the side streets, commercial uses on Firestone Boulevard, and industrial uses fronting the Metro Blue Line right-of-way, along Graham Street, from approximately E 82nd Street to Firestone Boulevard. The station is adjacent to Washington Park, however no clear connectivity exists between them.

The station area contains a number of parking lots, auto-oriented, and auto-serving uses and is particularly loud with noise generated from both vehicular and train traffic. There are a number of vacant properties and the generally discontinuous commercial development on Firestone Boulevard discourages a pedestrian-friendly environment.

Further, limited vehicular crossing points across the railroad tracks may result in pedestrian/bike/vehicular conflicts on Firestone Boulevard. Firestone Station's only access point is located at an intersection with the railroad corridor creating an uninviting and potentially unsafe entry point for users.

## Opportunities and Challenges

### Transit-Friendly Development

The TOD areas and Metro Blue Line stations are some of the most significant assets within the community, well situated for diverse retail and services, job-generating uses, and affordable housing for a range of user needs. The current land use pattern does not maximize the community's potential for improved mobility and transit-friendly development near the Metro Blue Line stations and bus lines.

Zoning for both residential and commercial areas within the TOD allows for more density than the existing development. Increases in residential density around station areas and commercial corridors will allow mixed-use structures and multi-level apartment buildings that can incorporate affordable units. Additionally, directing moderate- to higher-density mixed use development to transit nodes and commercial corridors, such as Slauson Avenue, Florence Avenue, and Firestone Boulevard, can contribute to the housing supply, support job-generating uses, and create pedestrian-friendly environments.

### Jobs/Housing Balance & Mixed Land Uses

A good jobs/housing balance will allow people to work in the community with the development of job-generating uses near transit stations. Presently, the great majority of work outside Florence-Firestone and the number of jobs provided in the community is not proportionate to the residential population. There is an opportunity to build upon the current mix of land uses in the area and further diversify the uses in transit accessible locations. Nearly all residential properties are located within a half-mile of commercially or industrially zoned land, which would support strong active transportation use with further development of infrastructure and community-serving uses.

## Public Realm & Connectivity

To address the lack of connectivity between transit systems, residences, places of work, and community resources, sidewalks should be widened and street trees should be planted along key streets, where possible, to create a comfortable and inviting pedestrian network. Pedestrian safety at railroad crossings in all station areas should be evaluated and enhancements implemented if necessary. Additional improvements to the area can include public art, pedestrian and bike amenities, façade improvements, and other streetscape enhancements to support pedestrian-friendly environments. These issues and opportunities are further discussed in the Connectivity, Commercial Areas, Community Identity, and Safety& Health sections.




Transformation of streetscape to create a safe and inviting pedestrian network with retail and services. Florence-Firestone Vision Plan, 2009.

## Goals and Policies

**Residential and Mixed-Use Projects.** As residential and mixed-use projects are encouraged on appropriate sites in the Transit Oriented Districts, goals and policies from the Residential Areas element are applicable here.

### TRANSIT-FRIENDLY DEVELOPMENT

**GOAL TD-1**

**Residents can live, work, learn, and recreate in a transit-oriented community.**

Policy TD-1.1

**Housing and Mixed-Use Development.** Provide mixed-use, medium- to high-density mixed-income residential development, and/or affordable housing in TOD areas. *(Refer to Infill Development policies in the Land Use Element and Housing Availability policies in the Housing Element of the General Plan for more information)*

Policy TD-1.2

**Urban Design.** Promote compact development that is well-designed, pedestrian-oriented, and environmentally sustainable.

Policy TD-1.3

**Public Facilities and Transit.** Encourage new public facilities and open spaces in transit-accessible locations with high pedestrian activity and visibility.

Policy TD-1.4

**Incentivize Specific Uses.** Incentivize development that incorporates desired uses, such as affordable housing, job-generating uses, community-serving retail and services, entertainment venues, or other uses that meet the public's daily needs. Incentives can include reduced parking requirements, increased floor area ratio, increased height allowance, or other methods.

Policy TD-1.5

**Active Ground Floor.** Promote high-quality urban design and active ground floors through design standards and a variety of allowed uses on major mixed use and commercial corridors.

Policy TD-1.6

**Infrastructure Improvements.** Require infrastructure (sewer, transportation, waste management, stormwater, public water, and open space) improvements as needed to support development and revitalization efforts in TOD areas.

Policy TD-1.7

**Mix Use Corridors.** Increase economic vitality by supporting neighborhood mixed use along Nadeau, Homes, Compton, and Florence Avenues to provide housing, jobs, and neighborhood services for community members in proximity to the Metro A line stations.

Policy TD-1.8

**Unbundled Parking.** Require unbundled parking for housing units in mixed use areas to separate the costs to rent a parking space from the cost of renting a residential unit, increasing affordability, and supporting more sustainable development.

### JOBS/HOUSING BALANCE & MIXED LAND USES

**GOAL TD-2**

**TODs are vibrant, job-rich areas providing quality work opportunities to community members.**

Policy TD-2.1

**Mix of Land Uses.** Support a balanced mix of land uses to provide jobs, housing, and commercial services in proximity to one another, ensuring compatibility between land uses and their environments. *(Refer to Business and Environmental Justice policies in the Economic Development Element and Employment Generating Uses policies in the Land Use Element of the General Plan for more information)*

Policy TD-2.2

**Transition of Industrial Uses.** Support the transition of aged industrial spaces to revitalized job-generating uses that are compatible with their immediate environment.

Policy TD-2.3

**Florence Avenue Station Land Uses.** Transition land uses in the industrially zoned area near the Florence Blue Line Station to higher density job-generating uses that include a mix of commercial, office, research and development, and compatible light industrial development with a pedestrian-oriented urban presence.

Policy TD-2.4

**Slauson Avenue Station Transit District.** Leverage the future West Santa Ana Branch transit line shared station area and Rail to Rail pedestrian and bicycle corridor by re-envisioning the Slauson Station TOD area to create a vibrant high-density job-generating district that supports taking transit, walking, and biking with housing employment uses, and neighborhood services.

Policy TD-2.5

**Firestone Boulevard Station Land Uses.** Develop diverse community-serving commercial retail and services with continuous, pedestrian-oriented street frontage to activate the Firestone Blvd. commercial corridor and station adjacent areas.

Policy TD-2.6

**Firestone Neighborhood Housing Options.** Enable a wider variety of low to medium density housing options within parts of the ½ mile area around the Firestone Metro A Line stations to increase housing supply and help lower residential risk to displacement.

## PUBLIC REALM & CONNECTIVITY

### GOAL TD-3
**Development in TODs supports transit use, encourages active transportation connectivity, and revitalizes station areas.**

Policy TD-3.1

**Commercial Uses.** Provide neighborhood services and commercial uses near station areas that can be easily accessed by walking or bicycling, including retail

Policy TD-3.2

**Active Transportation.** Design station area development to support active transportation and connectivity to the pedestrian and bicycle networks.

Policy TD-3.3

**Building Revitalization.** Revitalize existing buildings that positively contribute to the urban environment to support an improved pedestrian experience and identity for the TOD areas.

Policy TD-3.4

**Station Area Identity.** Create physical and visual connections between each Metro Blue Line station and adjacent neighborhoods, public facilities, public parks, and activity centers through installation of identifiable public art elements, inclusive of lighting, community markers, or other elements. *(Refer to Active Transportation Design policies in the Mobility Element of the General Plan and the Connectivity section of this plan for related policies.)*

Policy TD-3.5

**Station Safety & Maintenance.** Support local and regional agencies to improve safety, maintenance, beautification and coordination of services in station areas.

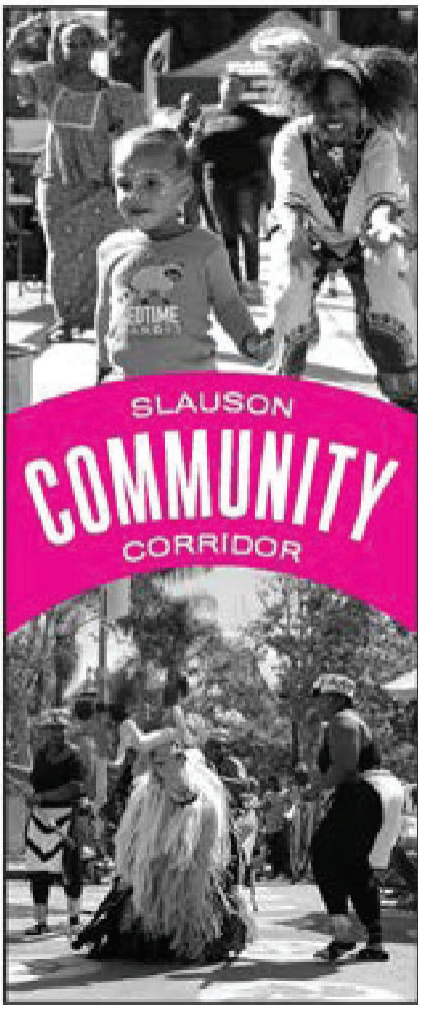
Policy TD-3.6

**Public Art.** Integrate public art throughout TOD areas, including on Metro right-of-way infrastructure, overpasses, within the public realm, and other visible areas.

Policy TD-3.7

**Slauson Station Access.** Prioritize access improvements focused around Slauson Station to further support future West Santa Ana Branch and Rail to Rail transportation investments.

## Community Identity (CI)




Street banners created for the Slauson Corridor revitalization project in View Park, Windsor Hills, and Ladera Heights.
*Design by Sussman/Prejza.*
*Courtesy, LA County Arts Commission*

### Vision

Create a community that is inviting and comfortable for all users, ensures the creation and maintenance of high-quality development, maintains clear public rights-of-way, and exhibits an identity specific to Florence-Firestone in the public realm, public facilities, and private development.

### Background

Improving the visual appearance of Florence-Firestone will enhance the community and strengthen community identity. The majority of structures in Florence-Firestone were built during the 1920s-1940s. Over the years some have been refurbished, while others are in need of reinvestment. Some of the existing structures could be historic resources warranting protection. Protecting and recognizing historical resources could strengthen community identity.

Public areas do not currently have sufficient pedestrian and biking facilities and amenities to support walking and biking. Florence-Firestone has lower vehicle ownership rates and residents use transit, walk, or bike to community destinations at a higher rate than other county areas. Some commercial corridors, such as the intersection of Florence and Compton Avenues, exhibit vibrant activity, but less active areas have not been well-maintained. Public areas need to be clean, comfortable, and safe to support a vibrant, active public space.

Alleys and easements are common elements in the community but have a negative perception in the community because of the accumulation of trash and debris from illegal dumping. Cleaning up the alleys and converting them into green space could add needed open space to the community. In addition, storage of inoperable vehicles and illegal work activities in the right-of-way negatively impact the function, livability, and appearance of the community.

Vacant and underutilized properties scattered throughout the community also present a challenge to maintaining a clean, comfortable public space. Some properties become targets for illegal dumping with dilapidated fencing and other negative markers. Issues that contribute to property vacancy and underutilization include absentee landowners and small lots that offer limited development options.

## Opportunities and Challenges

### Community Identity & Place-Making

Improvements to the visual and physical connections between parks, public facilities, and transit stations would significantly contribute to community identity and place-making efforts. Community resources, such as libraries and parks, should have a strong presence on the street, pleasing and eye-catching entryways, and strong physical connections to the community. Visual markers, entryway monuments, and the facades of public facilities and private structures provide excellent opportunities to infuse the community with a strong local identity. Visual entry point signage and corridor branding for the Florence Mile can further contribute to establishing a local identity. Preservation of historical resources can positively contribute to the community identity and sense of community history.



Streetscape example.
*Source Draft West Carson TOD Specific Plan, 2016.*

Highway overpasses, pedestrian bridges, and areas with long expanses of blank walls, such as along the Blue Line right-of-way, provide an opportunity to install public art and deter graffiti. Strong connections between public agencies and local organizations can target needed funds to create strong physical and visual links between key resources in the community, and to foster a collective identity in Florence-Firestone through public infrastructure, public facilities, and private development.

### Community Beautification

The visual appearance of a community is tied to both private and public investment in structures and the public realm. Improvements to and maintenance of structures, facilities, and infrastructure should be timely and on-going to maintain a positive image of the community. There are a number of residential streets, such as Hooper Avenue, Miramonte Avenue, Holmes Avenue, and Crockett Boulevard, that may be able to be converted to green streets to beautify residential areas. Potential alternative uses for the alley networks can improve active transportation and community beautification through creation of multi-use networks.

Absentee landowners have contributed to disinvestment in the community through deferred maintenance of aging structures. Also, absentee landowners





Fox Theater built on Florence Ave in the 1930s at a time when three theaters were located in the community. The structure was demolished in the 1960s.
*Courtesy, Los Angeles Public Library.*

may be unaware of activities occurring on their properties, resulting in unpermitted operations, subleasing of spaces to multiple parties, and work activities spilling over into the rights-of-way. Commercial, industrial, and residential tenants have limits on the improvements they can make to properties not under their ownership. Consolidated outreach efforts to property owners through partnerships with public, private, non-profit and community-based organizations can provide resources for façade improvements, facility upgrades, and other needed investments.

In addition, vacant properties detract from revitalization and reinvestment efforts in the community. Partnering with private, non-profit, and community-based organizations can facilitate reuse and development of vacant properties through programs for vacant-lot activation, demonstration projects, and creative place-making projects. Development of land banks in partnership with non-profit and local organizations are another method to address and develop vacant sites.

Proactive enforcement programs by public agencies for public rights-of-way, commercial, and industrial areas would greatly contribute to improving the community's overall quality of life. Public agencies can work in conjunction with community groups to educate community members about what constitutes a violation, empower them to report violations, and work with the local and state responders.

## Goals and Policies

### COMMUNITY IDENTITY AND PLACE-MAKING

**GOAL CI-1**

**The history and unique identity of Florence-Firestone is communicated and celebrated in the physical environment.**

Policy CI-1.1

**Preserve Historic Structures.** Preserve and protect historically and/or architecturally significant buildings, structures, and sites.

Policy CI-1.2

**Neighborhood Character.** Existing structures in sound condition and of noteworthy architectural and/or cultural character should be reused or integrated into new development to retain the character of neighborhood and commercial areas.

Policy CI-1.3

**Arts & Culture Spaces.** Integrate culture and arts spaces, such as a cultural center, auditorium, and outdoor amphitheater into County services facilities, libraries, parks, and public spaces, for performing arts events, workshop spaces, cultural events, and arts exhibitions.

Policy CI-1.4

**Civic Center.** Develop a Civic Center area collocated with public, private, and community resources, where community residents and visitors can meet to recreate, shop, eat, and enjoy entertainment, with a physical presence unique to Florence-Firestone.



Event with folklorico dancers taking place at the plaza incorporated into the La Alameda shopping center, 2014.

## COMMUNITY BEAUTIFICATION

**GOAL CI-2**

**Community identity is strong and proud, expressed in community spaces, locally held social and cultural activities, and an attractive public realm.**

Policy CI-2.1

**Public Programming.** Support outreach programs and the development of educational, recreational, and organized social activities that promote neighborhood pride.

Policy CI-2.2

**Florence Mile.** Support programs directed at promoting Florence Avenue as the "main street" of Florence-Firestone by creating a sense of place and destination through branding the corridor with public art, signage, creative place-making projects, and public programming.




Florence-Firestone Street Festival, 2014.

Policy CI-2.3

**Vacant Lot Activation.** Support programs to activate vacant and underutilized properties through temporary or permanent strategies in coordination with non-profit organizations.

**GOAL CI-3**

**New development is attractive and well-designed.**

Policy CI-3.1

**Pedestrian-Oriented Design.** Ensure new development activates adjacent sidewalks with pedestrian-oriented entryways, windows placed along the street frontage, and landscaping near sidewalks, avoiding long expanses of blank wall.



Example of well maintained, drought tolerant landscaping adjacent to the sidewalk provided by a private facility.
*Courtesy, Daryl Koonce*



Example of median landscaping.
*Courtesy, Daryl Koonce*

Policy CI-3.2

**Gathering Spaces.** Incentivize the creation of gathering spaces within private developments, such as landscaped seating areas, pocket parks, and plazas, as well as outdoor seating areas for eateries.



Landscaped courtyard and seating areas at La Alameda shopping center.

Policy CI-3.3

**Enhanced Public Realm.** Provide street tree plantings, street lights, street furniture, public art, median landscaping, community signage, gathering places, and shade structures within the public realm, prioritizing areas of heavier pedestrian activity.

Policy CI-3.4

**Publicly Accessible Open Space.** Require new private development to install and maintain publicly accessible open space in the form of public plazas, pocket parks, passive and active recreation areas.

## General Plan Policy

Community Design

**Policy LU 10.1:** Encourage community outreach and stakeholder agency input early and often in the design of projects.

## GOAL CI-4

**Public rights-of-way are clear, clean, well-lit, and well-maintained.**

Policy CI-4.1

**Alleyway Improvements.** Improve the appearance, function, and public use of alleys throughout the community by creating gardens, parks, greenways, urban trails, and appropriate lighting placed at regular intervals.

Policy CI-4.2

**Right-of-Way Code Enforcement.** Support proactive interdepartmental code enforcement of public rights-of-way for safety, clear access, and cleanliness by removing illegal dumping, inoperable vehicles, and other obstructions.

Policy CI-4.3

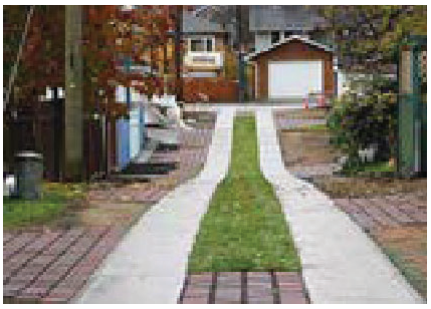
**Maintain Public Realm.** Regularly beautify, maintain, and repair sidewalks, pedestrian amenities, bikeways, and infrastructure in the public realm.

Policy CI-4.4

**Industrial Area Parking.** Prohibit overnight parking in industrially zoned areas as warranted.

Policy CI-4.5

**Street Lighting.** Support LED light installation on new and existing streetlight poles and, to reduce sidewalk clutter, consider combined street-scale and pedestrian-scale lighting on individual light poles, when and where feasible and appropriate.



Example of alleyway conversion to multi-use pathway.
*Source: Florence-Firestone Vision Plan, 2009*



Example of streetlight with both street and pedestrian-scale lighting.

# Safety and Health (SH)

## Vision

Improve safety through physical improvements and community-centered code enforcement, encourage active and healthy lifestyles, and expand health and safety resources within Florence-Firestone.

## Background

A safe and healthy environment where community members feel secure in their homes, schools, parks, places of employment, and shopping and entertainment areas is key to achieving the community's vision. Public safety is basic to all aspects of community development and cross cuts other land use elements, including the Environmental Justice and Industrial Areas elements. Access to recreation and healthy food is also important to improving public health in the community.

In 2017, CalEPA updated the CalEnviroscreen 3.0 to identify disadvantaged communities as those census tracts with a score of 75% or higher. A score of 75% or higher demonstrates a disproportionate burden on the community for particular environmental risks. Florence-Firestone received an average score of 75% and above on indicators related to particulate matter in the air, toxic releases, cleanup sites, solid waste sites near populated blocks, and overall pollution burden. Florence-Firestone also achieved scores of over 75% in a number of public health factors, including asthma related emergency visits and the rate of emergency department visits for heart attacks.

At community meetings, residents raised crime, gang activity, and safety as top issues. Litter and graffiti seen along the railroad and Blue Line rights-of-way, overpasses, billboards, vacant properties, alleyways, blank walls, and inoperable vehicles in the public right-of-way add to the negative view of safety. In addition to law enforcement, regular removal of litter and graffiti, greater visibility into public spaces and parks, and pedestrian-scale street lighting where feasible would enhance the perception of safety and comfort in public spaces.

### Community Safety

The Sheriff's Department has coordinated with the California Highway Patrol to enhance the presence of law enforcement officers in the community. In addition, the community has developed active neighborhood block watch groups. Further coordination between public safety agencies, County

Departments and local neighborhood groups could more effectively promote community safety and strengthen community relations with government services.

Given the community's young population, particular attention should be focused on strengthening safety around schools, such as enforcement of traffic regulations near schools, implementation of the "Safe Routes to School Initiative," and traffic calming measures near public spaces and schools.



Florence-Firestone Health Fair

### Environmental Design

The perception of safety influences behavior in and use of public spaces, including streets, sidewalks, parks, and transit stations. Enhancing the pedestrian environment with wider sidewalks, more crosswalks, and pedestrian-scale lighting can promote mobility and active use of public space and increase visibility. Clean, active, visible public space can improve the perception of safety.

Proactively addressing code violations, including removal of illegal outdoor storage in commercial and industrial areas as well as enhanced maintenance, removal of litter, junk and salvage materials, and graffiti would improve the physical environment and help with the perception of safety.

### Active and Healthy Residents

Improving street infrastructure and recreational space to support physical activity, such as walking and bicycling, can increase the level of physical activity in the community. Improvement to bicycle facilities may discourage bicyclist who often use sidewalks and decrease conflict with pedestrians. Joint use of schools for recreational purpose during non-school hours should be explored to increase recreational opportunities and take advantage of existing resources in the community.

Ongoing public outreach and education by the County Department of Public Health and Department of Health Services should be supported to increase the level of knowledge on health and wellness programs, nutrition, and healthy health issues and available resources.

### Healthy Food

Community members have identified a need to easily access high quality, affordable, and healthy food options at local grocery stores, supermarkets, eateries, and in schools. In addition, community members have commented



Florence-Firestone Community Garden

that high quality produce is not consistently available at local grocery stores and supermarkets. Supporting the establishment of a local farmer's market, growing edible gardens on underutilized properties, and encouraging markets and grocery stores to carry high quality, fresh produce would significantly contribute to the community's health.

## Goals and Policies

### COMMUNITY SAFETY

**GOAL SH-1**

**Public safety is seen and felt throughout the community.**

Policy SH-1.1

**Increase Law Enforcement Officer Presences.** Increase law enforcement officers' presence throughout the community, especially around parks, schools, transit stations, and other public spaces.

Policy SH-1.2

**Community-Based Crime Prevention.** Support ongoing interaction, coordination, and communication among existing community-based foot and bicycle patrols, watch programs, and with neighborhood and business organizations.

Policy SH-1.3

**Increase Community-Based Policing Near Public Facilities.** Promote safety, community-based anti-crime and anti-gang initiatives, and regular recreational and entertainment options to reduce crime and violence in areas around parks and public facilities.

Policy SH-1.4

**Safe Parking.** Promote safe parking of unhoused community members in County-owned parking lots.

### ENVIRONMENTAL DESIGN

**GOAL SH-2**

**Reduced crime and fear of crime through environmental design.**

Policy SH-2.1

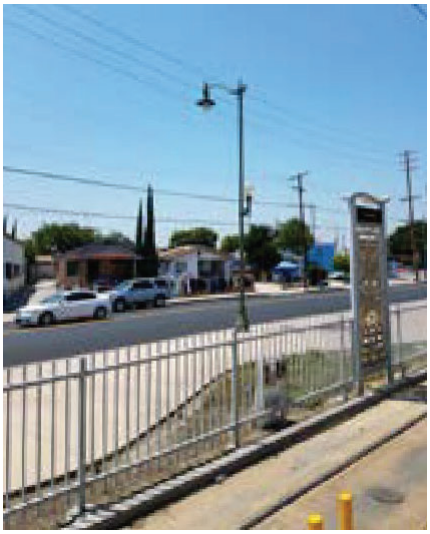
**Urban Design.** Pursue urban design strategies that reduce the opportunity for crime and violence in parks and in public streets, such as Crime Prevention through Environmental Design, which facilitates visibility into and monitoring of public space by residents and law enforcement.

Policy SH-2.2

**Improve Pedestrian Infrastructure.** Improve pedestrian infrastructure around schools and in the public right-of-way throughout the community.

Policy SH-2.3

**Increase Lighting for Pedestrians.** Provide enhanced pedestrian-scale lighting throughout the Florence-Firestone community to enhance traffic safety for people on foot and perceptions of personal security.



Example of dual purpose street- and pedestrian-scale lighting on one pole.
*Courtesy, Daryl Koonce*

## ACTIVE AND HEALTHY RESIDENTS

### GOAL SH-3

**Community members are active and healthy.**

Policy SH-3.1

**Encourage Walking and Bicycling.** Encourage programs and events to promote physical activity and encourage residents to walk or bicycle to community destinations such as schools, parks, and libraries.

Policy SH-3.2

**Promote Recreational Opportunities.** Increase recreational opportunities by using open spaces at parks and schools for leisure, recreation, and wellness through joint-use agreements.




Active recreation at Roosevelt Park Pool
*Courtesy, Los Angeles County Department of Parks and Recreation*

Policy SH-3.3

**Provide Health Education Classes.** Promote health and wellness in recreation programs, and provide classes and information on nutrition and healthy lifestyle choices, online and at County facilities.

Policy SH-3.4

**Ensure Access to Health Resources.** Provide high quality health care facilities and connect residents with resources, services, and information that are readily available and easily accessible.



Florence-Firestone Health Fair at La Alameda Shopping Center.

Policy SH-3.5

**Funding for Active Design Projects.** Promote active and healthy design implementation programs using resources from both public departments and private entities.

## HEALTHY FOOD

### GOAL SH-4

**Healthy food is accessible and affordable.**

Policy SH-4.1

**Repurpose Underutilized Space for Food.** Support farmers' markets and community gardens at community parks, schools, vacant lots, and within overhead utility easements.

Policy SH-4.2

**Repurpose Underutilized Space for Food.** Support farmers' markets and community gardens at community parks, schools, vacant lots, and within overhead utility easements.

Policy SH-4.2

**Urban Agriculture.** Promote the use of the Urban Agriculture Incentive Zone (UAIZ) and other incentives to convert underutilized properties and expand access to healthy and affordable foods.

Policy SH-4.3

**Encourage Fresh Food Options Through Permits.** Encourage supermarkets, food vendors, eateries, and other food related retailers to provide healthy, fresh food options through outreach and also by applying conditions in discretionary projects.

Policy SH-4.4

**Edible Gardens in New Developments.** Provide space for edible gardens within new developments.

### General Plan Policy

Community Wellness

**Policy LU 9.3:** Encourage patterns of development that increase convenient, safe access to healthy foods, especially fresh produce, in all neighborhoods.


FLORENCE-FIRESTONE
COMMUNITY GARDEN
Sponsored by Los Angeles Community Gardens Council
& Los Angeles County Second District

# EXHIBIT E



Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Slauson Station TOC Specific Plan, aka Florence-Firestone TOD Specific Plan

# **Final Environmental Impact Report**

December 2021
State Clearinghouse No. 2021030300

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# 1.0 INTRODUCTION

## 1.1 INTRODUCTION

This Final Environmental Impact Report (Final EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

a) The Draft Environmental Impact Report (Draft EIR) or a revision of the Draft;

b) Comments and recommendations received on the Draft EIR either verbatim or in summary;

c) A list of persons, organizations, and public agencies comments on the Draft EIR;

d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

e) Any other information added by the Lead Agency.

This document contains responses to comments received on the Draft EIR for the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) during the public review period, which began September 21, 2021 and closed November 5, 2021. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of Los Angeles County. This document and the circulated Draft EIR comprise the Final EIR, in accordance with CEQA Guidelines, Section 15132.

## 1.2 FORMAT OF THE FINAL EIR

This document is organized as follows:

**Section 1, Introduction.** This section describes CEQA requirements and content of this Final EIR.

**Section 2, Response to Comments.** This section provides a list of agencies and interested persons commenting on the Draft EIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A-1 through A-2 for letters received from agencies and organizations, and R-1 through R-9 for a letter received from residents). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

**Section 3, Revisions to the Draft EIR.** This section contains revisions to the Draft EIR text as a result of the comments received by agencies and interested persons as described in Section 2.

The responses to comments contain material and revisions that will be added to the text of the Final EIR. Los Angeles County staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not

previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

## 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be "on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. …CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to the public hearing at which certification of the Final EIR will be considered. The responses will be forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

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# 2.0 RESPONSE TO COMMENTS

Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the Lead Agency (Los Angeles County) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft Environmental Impact Report (Draft EIR) and prepare written responses.

This section provides all written responses received on the Draft EIR and Los Angeles County's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft EIR are excerpted in this document, the sections are shown indented. Changes to the Draft EIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

## 2.1 MASTER RESPONSES

Many commenters expressed the same or similar concerns related to changes proposed in the Specific Plan and/or expressed opinions or made requests for Los Angeles County to consider changes within one or more LA Metro Station Transit Oriented District (TOD) area. These comments, concerns, opinions, and requests have been noted and are included in the Final EIR for the decision-makers' considerations as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. Master Response I identifies the proposed FFTOD Specific Plan and Los Angeles County's overall intent for its implementation (note that Master Responses III through VI address four specific recurring concerns).

### I. The Proposed FFTOD Specific Plan and Los Angeles County's Intent

The project is a specific plan to establish transit-oriented development policy direction, development standards, and implementation programs as part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The specific plan also builds from the 2019 Florence-Firestone Community Plan (FFCP) by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County. The General Plan and FFCP are products of County planning that occurred in coordination with past community input, and the proposed FFTOD Specific Plan is a continuation of these efforts through the identification and establishment of focused land use planning/development and design standards for the Florence-Firestone community.

The FFTOD Specific Plan does not identify or propose any specific development projects. It establishes transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops.

The FFTOD Specific Plan provides for future flexibility/market adaptation by allowing for increased density/intensity for if/when it is needed while guiding development in concert with other Los Angeles County documents and programs, including the Housing Element and Green Zones Program (i.e., program to promote environmental justice by providing zoning requirements for industrial uses, vehicle-related uses, and recycling and solid waste

uses that may disproportionately affect communities surrounding these land uses). And as discussed above, the proposed FFTOD Specific Plan represents the culmination of Los Angeles County's efforts to establish transit-oriented development policy direction, development standards, and implementation programs of the TOD Program, FFCP policies, and broader sustainability goals of Los Angeles County.

It is important to note that, in addition to increasing living and working opportunities near the three LA Metro transit stations within the community (Slauson, Florence, and Firestone stations), the FFTOD Specific Plan would require standards for new development (e.g., wider sidewalks, open space, etc.) that are not currently required of new development in the community. In addition, the plan would provide safer ways of moving around the community by walking, bicycling, rolling, and/or using transit. It is the intent of the FFTOD Specific Plan to increase housing and employment opportunities in a contextually sensitive manner that are targeted to the unincorporated area community of Florence-Firestone to allow for greater flexibility and focus in addressing local community interests. Future development projects that are consistent with the FFTOD Specific Plan policies and development standards will in turn be consistent with the General Plan and FFCP policies.

Additionally, it is important to note that alternatives to the FFTOD Specific Plan were discussed and analyzed in the Draft EIR. This included the no project alternative (see Alternative 1: No Project/Development in Accordance with Existing Zoning) and an alternative that limited all land use and zoning changes to within the 0.5-mile TOD radius of only the Slauson Station (see Alternative 3: Slauson TOD Focused); refer to Section 4.0 Alternatives of the Draft EIR.

Los Angeles County received some comments suggesting that development of the Specific Plan was performed without involvement of the community, or that its development was kept hidden or obscured from residents that would be most affected by the project. Master Response II explains Los Angeles County's public outreach efforts during development of the Specific Plan.

## II. Public Outreach for the FFTOD Specific Plan

Public outreach for the FFTOD Specific Plan was facilitated though engagement with local community groups, residents, property and business owners, LA Metro, and the cities surrounding Florence-Firestone. Development of the Specific Plan and associated community engagement occurred during the COVID-19 pandemic. This created conditions that prevented Los Angeles County from conducting in-person meetings. As a result, various digital tools were used in combination with the distribution of printed materials to reach as many community members as possible in a range of formats. Feedback collected from participants helped shape the guiding principles and standards of the Specific Plan. Community engagement for the Specific Plan involved (1) stakeholder evaluation, (2) an online town hall, (3) focus groups and conversations with community partners, (4) an online story map, (5) online community mapping activity, and (6) educational packet and worksheet, briefly summarized below (refer also to Chapter 1 of the Specific Plan for additional details):

- Stakeholder evaluation to identify various perspectives within the community, and organizations who represent these perspectives. The

evaluation identified 32 Stakeholder Organizations – ranging from community-based organizations to business associations, service providers, elected bodies, and government agencies. These organizations were invited to provide feedback and assist with notifying and encouraging participation from community members throughout the planning process;

- An Online Town Hall meeting in October 2020 to share information and answer questions about four planning efforts including the FFTOD Specific Plan. The FFTOD presentation provided a project overview and timeline, information on community engagement and feedback opportunities;
- Multiple focus group sessions and conversations with community leaders and representatives identified in the Stakeholder Evaluation. Focus group sessions consisted of a short project overview presentation, a guided community mapping exercise, and conversations about the project's goals of increasing active transportation and transit use, increasing residential density near transit, encouraging affordable housing, increasing economic activity, and facilitating investment in infrastructure improvements;
- Available from September 2021, the online "StoryMap" website provides an easily-accessible overview of the proposed FFTOD Specific Plan, including introductory information on the Specific Plan, Los Angeles County's Transit-Oriented District Program, and the plan's Equity Goals, Land Use Objectives, Proposed Land Use, and Proposed Zoning. Virtual office hours were also offered by staff for one-on-one meetings starting this time through the present;
- Community members were invited to participate in an online mapping activity to help gather experience-based insights, priorities, and ideas for the FFTOD Specific Plan Area to help inform the planning process. Maps were provided for areas surrounding each of the three Metro stations, on which participants added a total of 230 location-based observations, concerns, and ideas;
- In response to feedback and concerns around preferred engagement methods and barriers to computer/internet access, Los Angeles County distributed a printed and easy-to-understand Transit-Oriented Planning Guide with a companion Community Feedback Worksheet in February of 2021. Community members returned 152 completed worksheets and provided feedback on the types of housing and mobility strategies desired by community members for Florence-Firestone. Specific Plan standards, including setbacks and allowed heights, were adjusted in response to community input from the worksheets;
- Los Angeles County staff joined five 8th grade history classes at Charles Drew Middle School to provide an overview on the specific plan project and TOD planning concepts to over 90 students and collected survey results on housing preferences and community priorities;
- Los Angeles County staff coordinated distribution of meeting flyers with Los Angeles County libraries in Florence-Firestone; and
- In addition, all meeting materials and meeting recordings were posted on Los Angeles County's project website, planning.lacounty.gov/fftod, so that

those who were unable to attend meetings at the time they were held, could still review recordings.

A specific recurring concern of the FFTOD Specific Plan was the potential for displacement of existing homeowners and renters in the community. Many commenters cited concerns of gentrification, or acceleration of gentrification, as a result of zoning changes, where re-development by wealthier developers may increase rents or developers may buy out existing property owners. Master Response III discusses Los Angeles County's consideration and efforts for protecting existing residents from displacement, gentrification and indirect displacement in general and as it relates to CEQA.

## III. Gentrification and Indirect Displacement

During preparation of the FFTOD Specific Plan, a "Community Atlas" and "Equity & Mobility Study" were created to document existing conditions specific to the TOD areas in Florence-Firestone. The Community Atlas noted that the existing land uses in the TOD areas are not currently conducive to promoting transit-oriented development. The study provided specific recommendations to support TOD development that formed the foundation of the design standards for new development that would come in in the future and implementing actions for the Specific Plan. The Equity & Mobility Study combined conventional assessment of transportation conditions with an evaluation of equity conditions related to demographics, land use characteristics, and socioeconomic conditions, because the level of investment in transportation infrastructure and services is often a direct reflection of a community's socio-economic and demographic status. The study established equity goals and identified existing county-wide policies to support these goals, identified best practices for advancing equity in TOD planning, assessed displacement risk within the FFTOD Specific Plan Area, assessed conditions and trends for all travel modes, and provided a series of recommendations based on these findings. It also considered impacts that would come to Florence-Firestone as a result of the new West Santa Ana Branch of the Metro A line that would connect the community to the southeastern parts of Los Angeles County. Equity recommendations included:

- Ensure current tenant, homeowner, and workforce protections are being used to their full potential and pursue additional policies to expand access to critical resources and infrastructure;
- Establish and reinforce long-term planning partnerships with community organizations;
- Align TOD land uses and densities with tailored needs for residents and businesses who may be most vulnerable to displacement; and
- Identify robust affordability policies and funding mechanisms that allow new development to successfully serve existing residents and businesses (due to the area's high overall housing cost burden).

The derived equity recommendations then helped to frame and refine the community outreach approach and Specific Plan standards. For example, the Equity & Mobility Study's socioeconomic analysis identified residents in the Firestone Station TOD area (neighborhood south of Nadeau) as being at the highest risk of displacement if rents increase and/or large-scale redevelopment occurs. Community feedback indicated a preference for

duplexes (two homes in one building) and adding accessory dwelling units (ADUs) to existing lots. As a result of these findings and feedback, a new zone was developed for the areas in the Firestone Station TOD to enable existing owners to add or legalize ADUs, make expanding existing homes easier, and disincentivize lot consolidation or larger-scale developments. To help preserve the stability of these residential neighborhoods while still adding much-needed housing options, the Firestone Station TOD area concept of the Specific Plan encourages conversion of existing homes to duplexes, and the addition of ADUs on existing single-family lots within the "More Housing Options" areas of the specific plan.

Additionally, it is also important to note that the provision of affordable housing is an objective of the Specific Plan. Affordable housing is addressed by the Specific Plan through help implementing the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the Regional Housing Needs Assessment (RHNA).

There is an important distinction between the CEQA threshold of the direct 'displacement of substantial numbers of existing people or housing' as a result of a proposed project and the indirect displacement of people tied to gentrification as a result of economic and social changes in a community. Los Angeles County is using the terms direct displacement, gentrification, and indirect displacement as follows:

- Direct Displacement: a more intentional or predictable outcome of planned changes in land use and the direct redevelopment of existing neighborhoods or business properties. Occurs when existing residential and/or business properties are converted to new, upgraded, and/or different land uses.
- Gentrification: a shift in the community toward wealthier residents/businesses and increasing property values, sometimes at the expense of poorer residents of the community. Gentrification can be associated with appreciation in housing prices and increases in educational attainment and household incomes.
- Indirect Displacement: defined as the potential outcome of community investment that results in rising property values, benefiting existing home and property owners but causing economic challenges (higher/unaffordable rents, competition with wealthier, and/or outside, investors, etc.) for renters and prospective owners. As a result, housing or business costs may become (more) unaffordable, and existing tenants may be forced by changing economic trends to find more affordable housing or business locations elsewhere.

The discussion of direct displacement impacts in the Draft EIR is a program-level (first-tier) analysis addressing the question of whether the FFTOD Specific Plan would result in the permanent displacement of substantial numbers of existing housing or people. Section 3.11 Population and Housing of the Draft EIR notes that direct displacement tied to implementation of the Specific Plan would be in the form of temporary construction-related displacement occurring at a parcel by parcel project level (due to the various considerations of project timing by individual future developers) over a period of approximately 15 years. Thus, it concludes that potential displacement of persons residing in an infill or redevelopment parcel would be short-term, and the FFTOD Specific Plan would result in a

greater number of residential units to house residents of the area, including those that may be temporarily displaced.

Regarding gentrification and indirect displacement, CEQA is concerned with physical effects on the environment. Economic and social effects are not physical effects on the environment and therefore not CEQA considerations. CEQA Guidelines Section 15131(a) states that "…economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project, through anticipated economic or social changes resulting from the project, to physical changes caused in turn by the economic or social changes. . . The focus of the analysis shall be on the physical changes." So, gentrification, which is a change measured using social and economic demographic criteria, is not a CEQA issue requiring discussion in the Draft EIR. Additionally, the Draft EIR did not speculate the extent to which indirect displacement of existing people or businesses could result in physical changes (e.g., secondary physical impacts, such as increased commute distances and their associated effects, resulting from individual choices [or lack of choices] regarding where displaced people move to work and live). Quantification of these types of impacts in the Draft EIR would be overly speculative.

However, the County is concerned with the issues of displacement and gentrification overall, and has instituted rental assistance, foreclosure prevention, and other programs through the Department of Consumer Affairs (https://dcba.lacounty.gov/) to help address these concerns.

Another specific recurring concern of the FFTOD Specific Plan was population/density increase; a number of commenters stated an opinion that the project would lead to overcrowding, and in some cases the commenters suggested that the Draft EIR minimized or downplayed the increase in population based on quotes of some of the overall findings in the Draft EIR. Master Response IV provides clarification regarding consideration of population and density.

## IV. Population/Density Increase

The Draft EIR considers buildout of the FFTOD Specific Plan to be a net increase of approximately 42,518 additional people associated with 12,110 new housing units, and 2,734 new jobs associated with new commercial development. The Draft EIR analyzes the potential impacts of increased population and associated demands placed on the community (such as those related to public services [see Section 3.12], utilities and service systems [see Section 3.16], parks and recreation [see Section 3.13], etc.). As discussed in Section 5.2 Growth Inducement of the Draft EIR, the population, housing, and employment projections with buildout of the FFTOD Specific Plan are greater than current projections identified by the Southern California Association of Governments (SCAG), and these projected increases are considered substantial. However, the FFTOD Specific Plan is consistent with SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, goals for focusing higher-density development in transit-rich areas. The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit- oriented development, promote active transportation, improve access to transit, reduce vehicle miles traveled (VMT), and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. Furthermore, analysis within Section 5.2 shows that both operational and

construction activities associated with implementation of the FFTOD Specific Plan would not induce population, housing, or job growth that would result in impacts to the environment. As such, the Draft EIR concluded that the FFTOD Specific Plan would not induce substantial unplanned population growth in an area, directly or indirectly. It should also be noted the FFTOD Specific Plan represents Los Angeles County's plans to establish transit-oriented development policy direction, development standards, and implementation programs as part of the broader TOD and sustainability goals of Los Angeles County over an approximate 15-year period. As such, SCAG will continue to develop, refine, and maintain regional and small area socio-economic forecasting/allocation models through coordination with Los Angeles County, resulting in refinements to growth projections.

Additionally, as communities in southern California continue to grow and the need to strengthen the link between the built environment and transportation system increases (such as housing construction in transit rich areas), other state laws will guide overall development and provide for increased density in these areas, but without the community-specific standards and focus of the FFTOD Specific Plan (see Master Response I).

A third specific recurring concern of the FFTOD Specific Plan was parking; commenters have identified substantial existing issues related to parking and commented that these issues would be worsened by the project. Master Response V is about parking.

## V. Parking

Concerns related to residential parking in Florence-Firestone neighborhoods was a reoccurring comment throughout the community engagement process for the FFTOD Specific Plan. Los Angeles County has identified two actions to address parking concerns in Florence-Firestone and in multi-family areas throughout Los Angeles County. Beginning in January 2022, Los Angeles County will undertake a Parking Study focused on the Florence-Firestone community. This effort will study the existing parking supply conditions in the residential neighborhoods, identify strategies and techniques to better manage the existing public parking supply and alleviate parking deficiencies, if found, and provide recommendations to manage the parking supply as growth occurs in the area. The data and findings of the Florence-Firestone Parking Study will inform the Los Angeles County Residential Parking Study project. The Countywide effort will study parking conditions in selected residential areas across Los Angeles County to support an ordinance amendment to current parking requirements and other related provisions in the Ordinance in order to remove barriers and improve efficiencies in the development of multi-family housing to help ease Los Angeles County's pressing housing shortage. This two-pronged approach is designed to modernize Los Angeles County's approach to parking regulations with specific data inputs and techniques to address concerns in Florence-Firestone.

Finally, many commenters have expressed frustration about the Florence Library and Los Angeles County's plans for this community resource Master Response VI is about the Florence Library:

## VI. Florence Library

Regarding the Florence Library, concern for the loss of the library was a reoccurring comment throughout the community engagement process for the FFTOD Specific Plan.

This community concern preceded the FFTOD Specific Plan process. On November 19, 2019, the Los Angeles County Board of Supervisors (Board) approved a motion to establish the proposed new Florence Library Project, Capital Project Number 77616 with an associated budget of $4,671,000 set aside for the project. Since that motion Los Angeles County has worked to identify additional funding for the library securing $1,000,000 from the Community Development Block Grant program, and explored through community engagement with a working group a range of alternatives for siting the proposed new Florence Library. An independent location for a new library could not be identified. As a result, Los Angeles County and the working group determined the most feasible location for the proposed new Florence Library would be conversion of the second floor (approximately 8,600 square feet) of the existing Florence-Firestone Constituent Services Center (FFCSC) located at 7807 S. Compton Avenue, Los Angeles, California. The project is currently scoped, as of June 23, 2021, to renovate the second floor FFCSC space to include a public library with adult, teen, and children's areas, including customer service desk, a library manager's office, and staff work room area. The project would also include reconfiguration of first floor space to serve as a community meeting room with audio/visual and telecommunications components to accommodate library programming; upgrading/reconfiguration of existing building mechanical, electrical and plumbing systems as appropriate; upgrading of public restrooms to be compliant with current Americans with Disabilities Act (ADA) requirements; and upgrading of systems to provide public access computers and Wi-Fi access. Currently the library project is planned to be completed in mid-2023.

The following is a list of agencies and persons that submitted comments on the Draft EIR during the public review period.

| Number Reference | Commenting Person/Agency | Date of Comment | Page No. |
|---|---|---|---|
| **Agencies & Organizations** | | | |
| A1 | South Coast Air Quality Management District | October 12, 2021 | 2-11 |
| A2 | Communities for a Better Environment | November 10, 2021 | 2-19 |
| **Residents** | | | |
| R1 | Justin Maghen | October 25, 2021 | 2-41 |
| R2 | Nellie Raygoza | November 5, 2021 | 2-43 |
| R3 | Myrna Ray | November 5, 2021 | 2-49 |
| R4 | Mari Garcia | November 5, 2021 | 2-51 |
| R5 | Abel Raygoza | November 5, 2021 | 2-59 |
| R6 | Ashley Orona | November 5, 2021 | 2-63 |
| R7 | Yanel Saenz | November 5, 2021 | 2-70 |
| R8 | Martha | November 5, 2021 | 2-72 |
| R9 | Yanel Saenz | November 5, 2021 | 2-76 |

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October 12, 2021

**Draft Environmental Impact Report (EIR) for the Proposed Florence-Firestone Transit Oriented District Specific Plan (Proposed Project) (State Clearinghouse No.: 2021030300)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments include information on the Community Emissions Reduction Plan (CEPR) for the designated Assembly Bill 617 (AB 617) Southeast Los Angeles community that the Lead Agency should include in the Final EIR. A1-1

Based on the Draft EIR, the Proposed Project consists of development of transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community in the Los Angeles County.

The Proposed Project encompasses a 3.48-square-mile area. The Proposed Project area is heavily impacted by air pollution generated from sources, such as heavy-duty diesel trucks, warehouses, and railroad activities, and includes the designated AB 617 Southeast Los Angeles community, which requires South Coast AQMD to work with community and other stakeholders to identify and address community concerns in disadvantaged communities. Through the AB 617 program, the community and South Coast AQMD staff have developed a Community Emissions Reduction Plan (CERP)[1] that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the AB 617 Southeast Los Angeles Community CERP on December 4, 2020. Since the adopted CERP existed at the time of the publication of the Notice of Preparation for the Proposed Project in March 2021, the Final EIR should include a discussion of the CERP. Additionally, the Proposed Project is a blueprint for the community's future development. The Draft EIR for the Proposed Project serves as the first-tier, programmatic level environmental analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, South Coast AQMD staff recommends that the Lead Agency review the actions included in Chapter 5 of the adopted CERP to explore whether additional mitigation measures can be identified and implemented by future development projects at the Proposed Project. A1-2

[1] South Coast AQMD. December 2020. Assembly Bill 617 Southeast Los Angeles Community Emissions Reduction Plan. Accessed at: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf.

Based on Figure 2-1, *Regional Location*, in the Draft EIR, the Proposed Project is located entirely within the South Coast AQMD's jurisdiction. The Draft EIR included a reference to the applicable air quality plans of the Antelope Valley AQMD (AVAQMD). It appears that AVAQMD's air quality plans are not relevant to the evaluation of the Proposed Project's air quality impacts and should not be included in the CEQA thresholds of significance for air quality (question 1) in the Final EIR. If the reference to the AVAQMD's air quality plans is not deleted, the Lead Agency should provide reasons for not deleting it supported by substantial evidence in the record. A1-3

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. A1-4

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC210921-04
Control Number

## A1. Response to Comments from South Coast Air Quality Management District, dated October 12, 2021.

A1-1 This is an introductory comment identifying the commenter, topic of the primary comment, and general details of the proposed project. No response is necessary.

A1-2 As suggested by the commenter, Section 3.2.2 Regulatory Setting of the Draft EIR has been revised to include a discussion of the Assembly Bill 617 Community Emission Reduction Plan (CERP) for the Southeast Los Angeles community. The revision is as follows:

> **Southeast Los Angeles Community Emissions Reduction Plan (CERP)**
>
> On December 4, 2020, the SCAQMD Governing Board adopted the Assembly Bill (AB) 617 Southeast Los Angeles Community CERP. The CERP outlines goals and actions by the Community Steering Committee (CSC), the SCAQMD, and the CARB to reduce air pollution in the Southeast Los Angeles community. An essential piece of the program is partnership and collaboration with the community to addresses the community's air quality priorities in the CERP. Based on the sources of air pollution impacting the community, the Southeast Los Angeles CSC identified the following air quality priorities to be addressed by this plan: truck traffic and freeways; railyards; rendering facilities; metal processing facilities; green space; and general industrial facilities. The CERP includes actions, such as developing and enforcing regulations, providing incentives to accelerate the adoption of cleaner technologies, and conducting outreach to provide useful information to support the public in making informed choices.

In addition, Los Angeles County has reviewed the measures and actions included in Chapter 5 of the CERP for the Southeast Los Angeles community, which includes Florence-Firestone. Goals and actions included in the CERP to reduce emissions from truck traffic and industrial facilities and exposure to emissions are included in the Programmatic Mitigation Measures included in Section 3.2.5 of the Draft EIR to be implemented by future development projects, as applicable. For example, Mitigation Measure AQ-6 requires that future development projects with the potential to generate substantial toxic air contaminant (TAC) emissions or expose sensitive receptors to substantial TAC pollutant concentrations, conduct a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. Potential mitigation options listed in Mitigation Measure AQ-6 include: providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations, incorporating

exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers), developing and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits, using on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy, and evaluating the potential to electrify a portion of entirety of an on-site user owned and operated truck fleet. These measures are consistent with the following CERP actions:

- Actions I and K (support implementation of truck emission reduction strategies and encourage the deployment of zero-emission trucks, respectively) and Action B (reduce non-critical idling) of the goal to reduce emissions from truck traffic and freeways;
- Action D (pursue the replacement of older diesel-fueled equipment at railyards with lowest emissions technology available) and Action H (cleaner cargo handling equipment and facility infrastructure requirements at ports and railyards) of the goal to reduce emissions from railyards and locomotives; and
- Action C (prioritize emissions sources and identify emissions and exposure reduction measure to encourage the adoption of technologies above and beyond rule requirements) of the goal to reduce emissions from general industrial facilities.

Similarly, other potential mitigation options listed in Mitigation Measure AQ-6 include: locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open, or providing building air filtration units with a Minimum Efficiency Reporting Value (MERV) and equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel particulate matter (PM) that enter buildings. These mitigation options are consistent with Action M of the goal to reduce exposure to truck emissions by installing air filtration systems. Furthermore, consistent with Action D (installing vegetative buffers near freeways) to increase green space, other potential mitigation options include using vegetated buffers between substantial TAC-generating source locations and sensitive receptors.

While the CERP primarily includes goals and actions for SCAQMD and CARB to implement, there are also opportunities to further expand the existing programmatic mitigation measures in the FFTOD Specific Plan EIR to ensure that future development projects are also consistent with the goals and actions of the CERP. Due to uncertainty associated with specific development within each land use type identified within the FFTOD Specific Plan, additional potential mitigation options that are consistent with the intent and goals of the actions included in the CERP (i.e., reducing emissions and exposure and increasing

public awareness) have been included as part of this Final EIR in Mitigation Measures AQ-4 and AQ-6. Mitigation Measures AQ-4 and AQ-6 have been revised as follows:

**MM AQ-4** For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- <u>Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and</u>
- <u>Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.</u>

**MM AQ-6** For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, the County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, the County shall

require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses. The County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed. Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts, which may include, but not necessarily be limited to:

- Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;
- Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;
- Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing "No Idling" signs;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;
- Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Evaluate the potential to electrify a portion of entirety of an on-site user owned and operated truck fleet;
- Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;

- Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;
- Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;
- Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Rerouting construction trucks away from congested streets or sensitive receptor areas;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;
- Establishing an electrical supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible;
- Using haul trucks with on-road engines instead of off-road engines;
- Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;
- Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and

- Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site.

A1-3 The reference to the Antelope Valley Air Quality Management District (AVAQMD) is part of the County of Los Angeles Environmental Document Reporting Procedures and Guidelines (CEQA Guidelines); these are standard Los Angeles County-specific thresholds that remain worded the same throughout Los Angeles County CEQA documents (in this case referring to both of the AQMD jurisdictions applicable to Los Angeles County as a whole). As identified in Section 3.2 Air Quality of the Draft EIR the proposed FFTOD Specific Plan Area is in the South Coast Air Basin (SCAB) and its air quality is regulated by the U.S. Environmental Protection Agency (EPA), California Air Resources Board (CARB), and SCAQMD. There are no other references to AVAQMD other than where this threshold is stated in the Draft EIR. No edit is proposed.

A1-4 This is a concluding comment identifying CEQA statutes relating to the requirements for responding to comments in a Final EIR. Los Angeles County has provided responses to written comments pursuant to Section 15088 of the CEQA Guidelines and these responses will be made available to SCAQMD at least 10 days prior to the public hearing at which certification of the Final EIR will be considered.

November 10, 2021

COMMUNITIES FOR A BETTER ENVIRONMENT
established 1978

Via E-Mail to:
Patricia Hachiya, Supervising Regional Planner
County of Los Angeles Department of Regional Planning
320 W. Temple Street Los Angeles, California 90012
phachiya@planning.lacounty.gov

**Re:** Florence-Firestone Transit Oriented District Programmatic Environmental Impact Report Draft

Dear Ms. Hachiya:

Communities for a Better Environment (CBE) appreciates the opportunity to comment on the Florence-Firestone Transit-Oriented District Specific Plan (FFTOD Specific Plan) Programmatic Environmental Impact Report. CBE is a community-based environmental justice organization that has been organizing with residents in the Florence-Firestone area for many years. Reinvestment in our community must include deeply affordable housing, anti-displacement measures, and remediation requirements that address the legacy of environmental contamination in the Florence-Firestone area. CBE has closely reviewed the Draft Environmental Impact Report (DEIR) for the FFTOD Specific Plan and is concerned about the Program's impacts and mitigation measures to cultural resources, air quality, greenhouse gases, hazards and hazardous materials, population and housing, transportation, and recreation. A2-1

## I. The DEIR Fails to Adequately Provide Mitigation Efforts in Cultural Resources.

The FFTOD Specific Plan DEIR distinguishes amongst the cultural resources that may be impacted: archaeological resources, historic resources, Native American resources, and paleontological resources. Under the Cultural Resources cumulative impacts section, the DEIR is vague and fails to outline specific mitigation efforts intended to preserve the historical resources that may be impacted by future developments under the FFTOD Specific Plan. Simply providing analysis and documentation by archeological and paleontological experts will not suffice for historical structures and sites impacted. Even with the uncertainty of development projects in the future, there should be stronger mitigation efforts towards protecting Florence-Firestone's historical resources. A2-2

Furthermore, residents also ask that the FFTOD Specific Plan reestablish existing cultural resources like the Florence-Firestone Library, which has been closed for many years without an adequate replacement. Residents are dismayed by the County's promises years ago to reinstate the Florence-Firestone Library after it was closed. To date, the County has not built a new library

as promised nor has it reopened the original library.[1] Residents would like to see that the County's reinvestment in the Florence-Firestone area prioritize reopening critical cultural resources, including the Florence-Firestone Library, before beginning any new construction.

A2-2 Cont'd

## II. The DEIR Fails to Provide Effective Protections Against Unsafe Air Quality.

Florence-Firestone is a community historically impacted by poor air quality due to disproportionate proximity to air pollutants and local greenhouse gas emissions.[2] As the FFTOD Specific Plan acknowledges, its intent "is to create a land use and zoning policy tool focused on the Florence-Firestone community . . . to increase affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, and reduce VMT." (DEIR at 3.2-19). Despite the intent of the FFTOD Specific Plan, the DEIR predicts that implementation of the Specific Plan would result in a "...substantial increase in emissions compared to existing conditions and would exceed SCAQMD'S ["South Coast Air Quality Management District's"] regional operational significance thresholds." (DEIR at 3.2-19). The DEIR further recognizes that implementation of the FFTOD Specific Plan would potentially be inconsistent with the applicable Air Quality Management Plans. The Florence-Firestone community must not be forced to choose between clean air and access to transit or affordable housing.

A2-3

The air quality mitigation efforts fail to consider the construction and operation impacts from implementation of the FFTOD Specific Plan on the air quality of Florence-Firestone. Although the DEIR purports to mitigate air quality impacts to the greatest extent practicable, the listed mitigation measures do not eliminate, or attempt to address, the future development implemented on behalf of the FFTOD Specific Plan. The DEIR states that additional measures cannot be "...readily estimated…" because the buildout of individual future projects and extent of operational emissions depends on future market conditions. (DEIR, 3.2-34). As California courts have acknowledged, uncertainty does not excuse a lead agency from discussing reasonably foreseeable impacts, alternatives, and mitigation measures within its DEIR.[3] As the DEIR acknowledges, residents' health will be negatively impacted, regardless of the intent behind the Specific Plan. The FFTOD must include a meaningful air quality analysis of future projects, a robust analysis of alternatives to the project, and concrete protections towards community members to ensure safe air quality conditions. As it is currently drafted, the DEIR fails to assess

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[1] Tanvi Varma, *A South Central Neighborhood Suffers from the Loss of its Community Library*, Medium (May 22, 2019) https://medium.com/intersections-south-la/a-south-central-neighborhood-suffers-from-the-loss-of-its-community-library-df783979ac60.

[2] CalEnviroScreen 4.0 shows that the Florence-Firestone area ranges from the 90th to the 99th percentile in environmental justice burden. Cal. Dept. of Envt'l H. Hazard Assessment, CalEnviroScreen 4.0, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/home/.

[3] *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, 40 Cal. 4th 412, 434 (2007) ("an EIR may satisfy CEQA if it acknowledges the degree of uncertainty involved, discusses the reasonably foreseeable alternatives . . . and discloses the significant foreseeable environmental effects of each alternative, as well as mitigation measures to minimize each adverse impact.").

any of these impacts with enough detail to fulfill CEQA's substantive mandate to mitigate environmental impacts to the maximum extent feasible.[4]

A2-3 Cont'd

## III. The DEIR Fails to Adequately Mitigate the Increase in Greenhouse Gases.

As mentioned in the DEIR, the Program will contribute to climate change through direct and indirect emissions of greenhouse gases (GHGs) from construction and operation of the land uses in the FFTOD Specific Plan Area. Local governments have a unique role in reducing California's greenhouse gas (GHGs) emissions by imposing stronger mitigation measures during the CEQA process. The Program's total net new GHG emissions is estimated at 95,613 MT CO2e and is expected to exceed the significant threshold adopted in the DEIR. The Program is also expected to exceed the local service population efficiency 2035 target of 2.36 MT CO2e. Therefore, when faced with significant environmental impact, CEQA requires a lead agency to adopt all feasible mitigation measures to address that impact prior to approval of a project.[5] The County has failed to adopt additional feasible measures here.

A2-4

### A. The County Can and Should Adopt All Feasible Mitigation Measures to Address the Program's Significant GHG Emissions.

The DEIR references the 2017 California Air Resources Board Scoping Plan, which provides a list of mitigation measures that could be implemented to reduce GHG emissions from individual projects. (DEIR at 3.6-23). While the DEIR proposes MM-AQ-7 as a GHG emission mitigation measure, it does not incorporate all possible mitigation measures and provides no explanation as to why the remaining measures are infeasible, as it should. This falls short of CEQA's requirement to consider all feasible mitigation to reduce or avoid the Program's significant impact.[6]

A2-5

Although the DEIR claims that the Program will result in an average daily VMT per service population that is 33 percent below the 2020 County Baseline, there are no additional mitigation measures that could further lower GHG emissions from the Program. For example, the CARB Scoping Plan recommends that lead agencies adopt on-site design features that promote street design policies that prioritize transit, biking, and walking, increase viable and affordable active and public transportation. Further GHG reductions can also be achieved through direct investment in local retrofit programs that can pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, energy efficient windows,

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[4] *See Mountain Lion Found. v. Fish & Game Com.*, 16 Cal.4th 105, 134 (1997) (interpreting Section 21081 to create a "substantive mandate" requiring affirmative mitigation on the part of permitting agencies).

[5] Pub. Res. Code § 21002; CEQA Guidelines § 15126.2.

[6] *See* Guidelines § 15126.4(a)(1); *see also* Guidelines §15126.4(a)(1)(B) (If more than one mitigation measure is available, the EIR must discuss each and describe reasons for the measure or measures it selects.).

insulation, and water conservation measures for homes within the Specific Area.[7] The Program could also require a certain amount of electric trucks, buses, and vehicles for use during the construction and operation of any new project in the Specific Area as an additional mitigation measure as mentioned in the DEIR. (DEIR at 3.6-9).

Here, the County should adopt these additional mitigation measures to ensure the maximum reduction in GHG emissions in the Specific Area. While it is possible for lead agencies to reject alternatives and mitigation measures on the basis of infeasibility, the EIR must still provide the basis of such a finding.[8] By failing to consider all feasible mitigation measures or explain - using substantial evidence to support its conclusions as to why such measures are infeasible - the DEIR fails to meet CEQA's requirements for mitigation.[9]

A2-5 Cont'd

Given the high intensity and density of the Program's GHG impacts, the County must adopt all feasible mitigation measures that could provide additional GHG reduction and co-benefits to the community through job training, improved air quality and public health, and ultimately increased quality of life.

## IV. The DEIR Fails to Adequately Address Exposure to Hazards and Hazardous Materials From Contaminated Sites Without Sufficient Remediation.

For over a century, families and children continue to live, recreate, and learn next to heavy industrial uses and contaminated sites, which in turn, has increased their exposure to toxic chemicals. As noted in the DEIR, the Specific Area contains 87 sites that have known contamination or sites where there may be reasons to investigate further and 15 sites that have the potential to affect groundwater quality, according to the State Water Resources Control Board. (DEIR at 3.7-6). While identification of these sites is useful, the baseline analysis must also discuss the known areas of contamination within the Specific Area, specifically as it relates to the former Central Metal site. Given these alarming numbers, the County can and must also adopt additional mitigation measures in this DEIR to protect families and residents from the future exposure to toxic chemicals during the construction of individual projects and decrease overall exposure.

A2-6

### A. The County Must Conduct a Holistic Analysis Before Upzoning Industrial Sites to Residential.

A2-7

As the DEIR correctly identified, many of the infill projects proposed by the Program could expose known and unknown soil contamination during construction activities and create a

[7] *See* California Air Resources Board, *2017 CARB Scoping Plan*, at 102 (https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf).
[8] 14 Cal. Code Reg. §15126.6(c); *Citizen of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565.
[9] *Preserve Wild Santee v. City of Santee* (2012) 210 CA 4th 260.

significant hazard to the public and the environment. (DEIR at 3.7-16; DEIR at 3.7-18). While the GeoTracker database provides an idea of the amount of underground storage tanks present in the area, it is possible that additional unidentified underground storage tanks are uncovered and disturbed during construction activities. (DEIR at 3.7-18). Therefore, it is imperative that the County conduct additional analysis of any parcels that will be rezoned for residential development to accommodate the 12,110 new housing units expected as part of the Program.

There should be additional mitigation measures that also study the presence of other harmful chemicals, besides lead-based paint and asbestos-containing materials that may be present in the Specific Area. We know that many parcels in Florence-Firestone, like the Central Metal Inc. facility, contain lead from industrial emissions, arsenic, and polychlorinated biphenyls (PCBs). This holistic assessment could provide the public a better understanding of the extent and magnitude of contamination present at sites with proposed development.

A2-7 Cont'd

**B. The DEIR Should Adopt Mitigation Measures That Address Potential Exposure to Hazardous Materials Post-Construction and During the Operation of the Program.**

While we agree with the adoption of MM HAZ-1 and MM HAZ-2, the DEIR should impose additional mitigation measures that could prevent potential release of hazardous materials and ensure the cleanup after a release occurs post-construction. As of now, MM HAZ-1 and MM HAZ-2 only deal with pre-construction activities. Given that the FFTOD Program will allow light industrial uses and increase density of people living near contaminated sites, the DEIR should adopt mitigation measures to minimize potential exposure, beyond what is already legally required, and ensure cleanup happens post-construction of a project in the Specific Area.

CEQA Guidelines §15330 (b)(1)-(10) provide a number of additional mitigation measures the DEIR could adopt. For example, minor cleanup actions could include:

A2-8

(1) Removal of sealed, non-leaking drums or barrels of hazardous waste or substances that have been stabilized, containerized and are designated for a lawfully permitted destination;
(2) Maintenance or stabilization of berms, dikes, or surface impoundments;
(3) Construction or maintenance or interim of temporary surface caps;
(4) Onsite treatment of contaminated soils or sludges provided treatment system meets Title 22 requirements and local air district requirements;
(5) Excavation and/or offsite disposal of contaminated soils or sludges in regulated units;
(6) Application of dust suppressants or dust binders to surface soils;
(7) Controls for surface water run-on and run-off that meets seismic safety standards;
(8) Pumping of leaking ponds into an enclosed container;

(9) Construction of interim or emergency groundwater treatment systems;
(10) Posting of warning signs and fencing for hazardous materials.

As previously mentioned, while it is possible for lead agencies to reject alternatives and mitigation measures on the basis of infeasibility, the EIR must still provide the basis of such a finding.[10] Further, although MM HAZ-2 requires that remediation occur prior to development projects on former industrial sites, the DEIR should provide additional measures to ensure proactive steps are taken, in collaboration with the Department of Toxics and Substances Control and other regulatory bodies, to fully investigate and remediate affordable housing projects. In particular, CBE recommends that the DEIR be modified to commit to mitigation measures requiring voluntary remediation programs with DTSC if any contamination is revealed following the Phase I Environmental Site Assessment. In recognition of the significant environmental burdens already facing residents of Florence-Firestone, these voluntary cleanup programs should go above and beyond state and local regulatory requirements.

A2-8 Cont'd

## V. The DEIR Does Not Adequately Analyze Impacts on Population and Housing.

In addition, the FFTOD Specific Plan encourages the development of mixed use, commercial, and residential land uses. In particular, the plan focuses on the development of new housing along major transportation corridors: Compton Avenue, Florence Avenue, Nadeau Street, and Firestone Boulevard, which are "characterized by low-scale commercial and industrial uses on small lots." (DEIR 2-2.) The plan will add an estimated additional 12,110 new residences, increasing the population of people who live and work in Florence-Firestone by 42,518 people over the next 10 years.

Although the DEIR contemplates significant changes to the character of Florence-Firestone, it nonetheless concludes that "the project would not displace substantial numbers of existing people or housing." It further determines that the Plan would not induce substantial unplanned population growth, either directly or indirectly. CBE urges LA County to analyze in respect to this project gentrification in and around Florence-Firestone. Although CBE generally supports the provision of new affordable housing, we reiterate concerns expressed in our April 19th comment letter that development of market-rate housing in these commercial corridors may accelerate, rather than combat, gentrification and displacement.

A2-9

In particular, the FFTOD Specific Plan fails to contemplate the likelihood of transit-induced gentrification related to the implementation of the West Santa Ana Branch (WSAB) line, which will run through Slauson Station. Transit-induced gentrification, the phenomenon by which local agencies approve or facilitate new transit infrastructure projects without first assuring affordable-housing protections, runs the risk of triggering displacement by increasing rent for

[10] 14 Cal. Code Reg. §15126.6(c); *Citizen of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565.

existing residents in the Florence-Firestone area.[11] Moreover, although the WSAB line will not serve the Florence and Firestone station, the FFTOD Specific Plan contemplates an increase in ridership on the Metro Blue Line, which serves these stations. The increases in transit access contemplated in the FFTOD Specific Plan must be accompanied by an increase in protections for affordable housing in the service area for the transit lines.

Despite the well-documented impacts of transit-induced gentrification, the DEIR makes no effort to provide specific guardrails to prevent displacement resulting from transit-induced gentrification. The DEIR makes little effort to grapple with the risk resulting from these impacts, instead concluding that improved access to transportation can improve access to jobs and opportunity. (DEIR, 3.14-4). This cursory discussion does not adequately support the conclusion that increased transit services will not further increase rent burden for residents within the Specific Plan Area, who experience high risks of displacement compared to Los Angeles County overall. The DEIR similarly relies on the development of accessory dwelling units, and facilitation of market-rate housing. Although both of these practices can improve overall housing stock, neither one addresses the communities most at risk of displacement as recognized in the DEIR, including families in large households, Hispanic/Latinx residents, or those at risk of employment fluctuation due to the COVID-19 pandemic.

A2-9
Cont'd

In light of these shortcomings, the Specific Plan and DEIR must be revised to include a feasibility analysis of additional affordable housing and community-based programs. LA County and DRP should further explore opportunities for collaboration with Los Angeles Metro to help preserve and develop new or existing affordable housing in conjunction with the buildout of the WSAB line and other transit improvements detailed in the Specific Plan. This includes, but is not limited to:

- Exploring the construction of affordable housing units through the Metro Joint Development portfolio;
- Deploying the Metro Affordable Transit Connected Housing (MATCH) Program;
- Stabilizing existing communities by supporting the retention of small businesses with loans that leverage public and private partnerships to catalyze investment in small businesses near transit projects.[12]

Further, the DEIR does not adequately analyze the impacts resulting from the temporary displacement of residents during construction activities. Although the DEIR does briefly

[11] Jeff Turrentine, Blog Post, When Public Transportation Leads to Gentrification, Natural Resources Defense Council, https://www.nrdc.org/onearth/when-public-transportation-leads-gentrification (June 1, 2018); Casey Dawkins & Rolf Moeckel (2016) Transit-Induced Gentrification: Who Will Stay, and Who Will Go?, Housing Policy Debate, 26:4-5, 801-818, DOI: 10.1080/10511482.2016.1138986

[12] Many of these suggestions are taken directly from LA Metro's Transit Oriented Communities Implementation Plan. Elizabeth Carvajal, Metro et al, Transit Oriented Communities Implementation Plan, Los Angeles Metro, 35, http://allianceforcommunitytransit.org/wp-content/uploads/2020/11/Metro-TOC-Implementation-Plan_Final.pdf (last visited Oct. 7, 2021).

acknowledge that implementation of the FFTOD Specific Plan will result in displacement of residents during construction activities, it eschews further analysis on the basis that future development will occur "sporadically at a parcel by parcel project level." (DEIR 3.11-10). The mere fact that a DEIR does not contemplate specific development projects does not excuse an agency of its duty to analyze reasonably anticipated future development encouraged by the issuance of a planning document. Here, one of the primary purposes of the FFTOD Specific Plan is to "streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan." (DEIR ES-2). Thus, the DEIR's failure to analyze environmental impacts resulting from displacement related to construction that is explicitly authorized and streamlined under the FFTOD Specific Plan represents an impermissible segmentation of the environmental review process. California courts have repeatedly held that CEQA requires an agency to evaluate the environmental effects of a project at the earliest possible stage in the planning process. As a corollary, planning documents issued by a county must analyze the ultimate effect of any development authorized or contemplated within the document.[13]

A2-9 Cont'd

Here, the DEIR makes no attempt to predict or analyze the impacts of construction-related displacement caused by the implementation of the FFTOD Specific Plan. Nonetheless, the FFTOD Specific Plan proposes to streamline construction and development processes that risk displacing existing residents of the Florence-Firestone area. Because the DEIR does not analyze these environmental impacts, it must be recirculated to study and propose mitigation measures to reduce the Specific Plan's anticipated impacts on the environment with regard to gentrification and displacement.

## VI. The DEIR Fails To Account For The Project's Transportation Impacts.

We are concerned that there are no mitigation measures for construction activities associated with this new development. Furthermore, there are no plans or analysis to increase parking due to the increase in residential housing and jobs in the community. An EIR violates CEQA where it improperly defers formulation of mitigation measures.[14] If the formulation of mitigation measures during the EIR process is impractical or infeasible, CEQA allows for deferral of mitigation until after project approval only where the agency: (1) commits itself to the mitigation; (2) adopts specific performance standards the mitigation must achieve; and (3) identifies the types of potential actions that can feasibly achieve that performance standard and

A2-10

[13] *See City of Redlands v. Cty. of San Bernardino*, 96 Cal. App. 4th 398, 409 (in the context of amendments to a county's general plan, "A general plan embodies an agency's fundamental policy decisions to guide virtually all future growth and development. "Even if a general plan amendment is treated merely as a 'first phase' with later developments having separate approvals and environmental assessments, it is apparent that an evaluation of a 'first phase-general plan amendment' must necessarily include a consideration of the larger project, i.e., the future development permitted by the amendment.")

[14] *See Preserve Wild Santee v. City of Santee* 210 Cal.App.4th at 281 (finding that the EIR deferred mitigation measures by failing to specify performance standards or describe the actions anticipated to achieve the performance standard.).

that will be considered, analyzed, and potentially incorporated in the mitigation measure.[15] Here, the County must account for the increased parking demand that residents will experience as a result of construction and the population increase in the area created by the program.

A2-10 Cont'd

## VII. The DEIR Fails To Account For Recreation Impacts.

CBE is concerned that the DEIR fails to study the impacts of not creating any new open space, parks, or green spaces as part of the FFTOD. In consultation with our members, we believe that any parkland or pay fees from any new residential units must be invested in and remain the Florence-Firestone area. Any fees collected from missing green or open spaces should be used to acquire new land for parks in the Specific Area or rehabilitate existing parks in the area. Moreover, there are no mitigation measures to ensure that the collected fees are used within a reasonable time to create new parks in the area or rehabilitate existing parks. Proposing the program without information on the timing of this program does not allow the public or decision-makers to evaluate the effectiveness of the program in the EIR process and provides the possibility that this program might never occur. Residents would like to see timelines and deadlines the County will impose to ensure that more park space is prioritized as part of the FFTOD Specific Plan.

A2-11

## VIII. Conclusion

CBE greatly appreciates the opportunity to comment on the FFTOD Specific Plan DEIR. CBE recognizes that improving access to transit and healthy-affordable housing is central to achieving environmental justice outcomes. While the FFTOD Specific Plan has made strides over past iterations towards developing more equitable transit and housing solutions, we ask that the County make every effort to further consider and address the longstanding history of environmental injustice and racism within Florence-Firestone. CBE's members and staff urge the Department of Resources and Planning to further evaluate the anticipated impacts of future development, consistent with the FFTOD Specific Plan, on the underlying character of Florence-Firestone and its affordable housing stock, as well as the anticipated and existing environmental burdens that its residents experience. CBE further emphasizes that the uncertainty of future development, as contemplated under the FFTOD Specific Plan, does not excuse the County of its duty to consider the potential and anticipated environmental impacts that may result from its implementation.

A2-12

[15] CEQA Guidelines §15126.4 (a)(1)(B); *POET, LLC v State Air Resources Bd.* (2013) 218 CA4th 681, 735-37.

Systemic inequalities and institutional racism have deprived environmental justice communities - including Florence-Firestone - of the myriad physical, mental, and social benefits that quality transit and housing provide. Although it is impossible to reverse the many decades of land use shortcomings that exist in Los Angeles through any single planning document, it is our hope that the TOD Program can serve as an opportunity to provide impacted individuals with a seat at the table and craft proper mitigation measures that truly offset project impacts in the communities that CBE serves. We thank you again for this opportunity to engage in the planning process.

A2-12
Cont'd

Sincerely,

/s/
Idalmis Vaquero
Legal Fellow

Gabriel Greif
Legal Fellow

Janet Zamudio
Legal Intern

## A2. Response to Comments from Communities for a Better Environment, dated November 10, 2021.

A2-1 This is an introductory comment identifying the commenter and introducing the primary topical concerns that are detailed in the letter. Refer to the detailed responses to specific comment/concerns that follow.

A2-2 Los Angeles County recognizes that the Draft EIR does not provide any resource-specific protection or mitigation for cultural resources discussed within Section 3.3 Cultural Resources of the Draft EIR. This is because the Draft EIR is a Programmatic EIR and is therefore more conceptual than a project-specific EIR. As such, the discussion of impacts and mitigation measures are generalized for a program-level decision from which future development projects will use as starting points to determine their applicability and to develop additional and/or more specific mitigation measures (as necessary) that would be identified in the project-specific analysis associated with their specific location and type of action.

The FFTOD Specific Plan does not identify or propose any specific development projects. It establishes transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. The Draft EIR analysis is not intended to focus on the site-specific construction and operation details of each possible future development within the FFTOD Specific Plan Area. Rather, the Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the proposed FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from the Program EIR.

At this time, Los Angeles County is only able to identify and prescribe future protection for cultural resources via professional assessment and identification of general treatment standards, recordation procedures, and construction monitoring requirements (refer to MMs CUL-1 through CUL-3).

The Draft EIR recognizes that historic structures and sites that are eligible or potentially eligible for National Register of Historic Places (NRHP) listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated

for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant. The determination of feasibility will occur on a case-by-case basis as future development applications on sites containing historic structures are submitted. In addition, some structures that are not currently considered for historic value (because generally, they must be at least 50 years old) could become worthy of consideration during the planning period for the project (i.e., during the horizon year of 2035). While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact. However, as mentioned, the actual impact to cultural resources will be determined on a case-by-case basis within each subsequent project-level, second-tier document, which would involve a CEQA-related public review period during which CBE and the community will have the opportunity to review and comment on the more specific and construction-level mitigation measures at that time.

Regarding the Florence Library (presently the 'Florence Express Library' located at Roosevelt Park), Section 3.6 Cultural Resources of the Draft EIR lists its former location as being identified through public outreach efforts as a cultural resource, but the former property location has not yet been evaluated for national, state, or local register eligibility. The comment is noted about residents' wishes to reestablish the Florence Library at its former location. Regarding the provision of library facilities in general, refer to Section 3.12 Public Services of the Draft EIR, which notes the library mitigation fee of $970 per dwelling unit (fiscal year 2019-20) for residential developments in unincorporated Los Angeles County areas. As noted, a total of $11,746,700 in developer fees would be collected based on the 12,110 residential unit buildout. Use of such fees by Los Angeles County Library for construction of new and/or expanded library facilities would reduce project impacts on library facilities in the FFTOD Specific Plan Area.

A2-3 As discussed above, this Draft (programmatic) EIR is more conceptual than a project-specific EIR, with generalized impacts and mitigation measures for a program-level decision. The Draft EIR analysis is not intended to focus on the site-specific construction and operation details of each possible future development within the FFTOD Specific Plan Area. Rather, the Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the

proposed FFTOD Specific Plan. As such, for purposes of disclosing the air quality impacts of implementation of the FFTOD Specific Plan, assumptions used to estimate its potential construction-related emissions are conservate (i.e., assumed that up to 25 percent of all land uses within the FFTOD Specific Plan Area could be developed within the earliest possible construction year).

As discussed in Section 3.2 Air Quality of the Draft EIR, it is possible that construction activities related to implementation of the FFTOD Specific Plan would not exceed SCAQMD thresholds of significance. However, since the timing and level of construction activities within each year is unknown, it is not possible at this time to refine the conservative assumptions and determine the extent to which additional reduction strategies are feasible or would result in emission reductions. It was thus conservatively assumed that construction-related emissions could exceed significance thresholds (thus conflicting with or obstructing implementation of the applicable air quality plan) and, that this impact is significant and unavoidable.

It is not reasonable nor possible to expect that the emissions from future development projects be completely eliminated. However, the express intent of the programmatic mitigation measures included in the Draft EIR is to address emissions from future development projects pursuant to implementation of the FFTOD Specific Plan. As mentioned, the programmatic mitigation measures will be used as starting points to determine their applicability to each future development project and to develop additional and/or more specific mitigation measures (as necessary). The measures identified at this point (including use of Tier 4 Final emissions standards [see MM AQ-1], fugitive dust control [see MM AQ-2], use of super-compliant low VOC paints [see MM AQ-3], etc.) would reduce construction-related emissions. Additionally, other programmatic mitigation measures ensure that applicants for future development projects will include, as part of their second-tier environmental analyses pursuant to CEQA, project-specific modeling of localized emissions and, when applicable, site-specific health risk analysis, which will result in additional specific mitigating actions to reduce construction- and operation-related emissions; see MMs AQ-4 and AQ-6 for lists of what some of these actions would/could include.

Each subsequent project-level, second-tier document will analyze air quality at the project level and would involve a CEQA-related public review period during which CBE and the community will have the opportunity to review and comment on the more specific mitigation measures at that time.

Additionally, in response to the South Coast Air Quality Management District (SCAQMD)’s comment letter on the Draft EIR, Los Angeles County has added

some additional potential mitigation options as part of this Final EIR in Mitigation Measures AQ-4 and AQ-6 that are consistent with the intent and goals of the actions included in SCAQMD's Community Environmental Reduction Plan (CERP) (i.e., reducing emissions and exposure and increasing public awareness).

A2-4 While the unmitigated total net new greenhouse gas (GHG) emissions estimation (95,613 metric tons of carbon dioxide equivalent [MT CO2e]) was identified in the Draft EIR as exceeding the significance threshold, it is not correct that Los Angeles County failed to adopt measures to address it. As shown in Table 3.6-8 of the Draft EIR, MM AQ-7 (banning fireplaces) along with implementation of the 2019 Building Energy Efficiency Standards (Title 24) were shown to lower the total net new GHG emissions estimation to 82,574, MT CO2e, resulting in a net emissions per service population that would be below the significance threshold, and therefore a less than significant impact with respect to greenhouse gas emissions. See also response to comment A2-5, below.

A2-5 It should be noted that many of the programs and policies proposed as part of the FFTOD Specific Plan are intended to achieve energy efficiency and 'green' building/infrastructure strategies and are incorporated as part of the requirements of the Specific Plan rather than as mitigation measures; refer to Table ES-2 of the Draft EIR that lists key existing regulations, requirements, and procedures for future development projects pursuant to implementation of the FFTOD Specific Plan.

As discussed in Section 3.6 Greenhouse Gasses of the Draft EIR, the FFTOD Specific Plan and its objectives would directly support the goals of AB 32 and SB 32 (which contains the GHG emissions target that California Air Resource Board (CARB)'s 2017 Climate Change Scoping Plan was adopted to address). For example, the State's 2017 Scoping Plan update includes vehicle miles traveled (VMT) reduction goals that call for promotion of land use and community design that reduce VMT, transit-oriented development, and complete street design policies that prioritize transit, biking, and walking. In addition, the FFTOD Specific Plan would comply with the most current Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) requirements. The CALGreen requirements include mandatory measures for all new building construction, which would result in energy conservation, and make a major contribution in meeting the State's goals established by Assembly Bill (AB) 32 and Senate Bill (SB) 32 for reduction in GHG emissions. Further, future buildings constructed over the lifetime of the project would be subject to the future triannual updates to the Building and Energy Efficiency Standards, which will ultimately require zero net energy construction.

Thus, as concluded in Section 3.6, implementation of the FFTOD Specific Plan would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant. It should be noted the list identified in this comment (beginning on page 3.6-9 of the Draft EIR) identifies major elements of the 2017 Scoping Plan framework (strategies for the state to target GHG emissions), not project-specific measures. However, as discussed above, the FFTOD Specific Plan directly supports the overall intent of the framework. Furthermore, as a program-level Draft EIR, the programmatic mitigation measures identified in this first-tier document will be used as starting points for future development projects to determine their applicability and to develop additional and/or more specific mitigation measures (as necessary).

A2-6 Los Angeles County has identified programmatic mitigation measures in the Draft EIR to protect human exposure to hazards and hazardous materials, from which future development projects will use as starting points to determine their applicability and to develop additional and/or more specific mitigation measures (as necessary).

A2-7 This Draft (programmatic) EIR is more conceptual than a project-specific EIR, with generalized impacts and mitigation measures for a program-level decision. The Draft EIR analysis is not intended to focus on the site-specific construction and operation details of each possible future development within the FFTOD Specific Plan Area. Rather, the Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the proposed FFTOD Specific Plan. As such, site-specific hazards and hazardous materials investigation of individual parcels will be performed as part of the second-tier environmental documents for each individual future development project pursuant to the FFTOD Specific Plan. See also response to comment A2-8, below.

A2-8 As discussed, MMs HAZ-1 and HAZ-2 are programmatic mitigation measures (with the express purpose of addressing any contamination that may be present prior to occupancy) from which future development projects will use as starting points to determine their applicability and to develop additional and/or more specific mitigation measures (as necessary). The items listed in this comment from CEQA Guidelines Section 15330 are examples of minor cleanup actions that could be classified as Class 30 Categorical Exemptions under CEQA. However, to the extent the listed conditions exist, or treatment needs are necessary, based on the site-specific investigations within second-tier environmental documents of future development projects, these are examples of cleanup actions that could

occur and would be related to the site survey and/or Phase I Environmental Site Assessment tied to MMs HAZ-1 and HAZ-2.

As identified in HAZ-2, if contamination is found at significant levels, project applicants shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), Los Angeles County Fire Department (LACoFD), etc. As such, the programmatic mitigation measures will ensure steps are taken, in collaboration with the appropriate regulatory agencies, to fully investigate and remediate (if necessary) parcels to be developed pursuant to implementation of the FFTOD Specific Plan. Remediation of contamination revealed following a Phase I Environmental Site Assessment (ESA) is a requirement prior to any new development.

A2-9 There is an important distinction between the CEQA threshold of the direct 'displacement of substantial numbers of existing people or housing' as a result of a proposed project and the indirect displacement of people tied to gentrification as a result of economic and social changes in a community. For this response Los Angeles County is using the terms direct displacement, gentrification, and indirect displacement as follows:

- Direct Displacement: a more intentional or predictable outcome of planned changes in land use and the direct redevelopment of existing neighborhoods or business properties. Occurs when existing residential and/or business properties are converted to new, upgraded, and/or different land uses.
- Gentrification: a shift in the community toward wealthier residents/businesses and increasing property values, sometimes at the expense of poorer residents of the community. Gentrification can be associated with appreciation in housing prices and increases in educational attainment and household incomes.
- Indirect Displacement: defined as the potential outcome of community investment that results in rising property values, benefiting existing home and property owners but causing economic challenges (higher/unaffordable rents, competition with wealthier, and/or outside, investors, etc.) for renters and prospective owners. As a result, housing or business costs may become (more) unaffordable, and existing tenants may be forced by changing economic trends to find more affordable housing or business locations elsewhere.

The discussion of direct displacement impacts in the Draft EIR is a program-level (first-tier) analysis addressing the question of whether the FFTOD Specific Plan would result in the permanent displacement of substantial numbers of existing housing or people. Section 3.11 Population and Housing of the Draft EIR notes

that direct displacement tied to implementation of the Specific Plan would be in the form of temporary construction-related displacement occurring at a parcel by parcel project level (due to the various considerations of project timing by individual future developers) over a period of approximately 15 years. Thus, it concludes that potential displacement of persons residing in an infill or redevelopment parcel would be short-term, and the FFTOD Specific Plan would result in a greater number of residential units to house residents of the area, including those that may be temporarily displaced. The Draft EIR is not 'eschewing further analysis'; rather, it is noting the effects of implementing the overall FFTOD Specific Plan over its anticipated buildout period of approximately 15 years. Subsequent (second-tier) analyses of individual future development projects may address the construction-specific displacement effects, as appropriate, of the individual future development projects if CEQA analysis is required. It is important to note that the Draft (Program) EIR is intended to streamline and focus/organize the environmental review (and thus approval) process of the second-tier documents of future development projects and would not be a streamlining (e.g., fast-tracking without further environmental consideration) of construction/development, as this comment appears to indicate. Segmentation under CEQA, or dividing a project into two or more pieces, avoids analyzing the related pieces as a whole and thus minimizes the apparent environmental impacts of the whole of the action. In the case of the FFTOD Specific Plan, Los Angeles County is first providing a program-level analysis of the whole of the action, which will then be followed by the individual, construction-level analyses of individual future development projects (as they are proposed by individual applicants). This is not a segmentation of the environmental analysis.

Regarding gentrification and indirect displacement, CEQA is concerned with physical effects on the environment. Economic and social effects are not physical effects on the environment and therefore not CEQA considerations. CEQA Guidelines Section 15131(a) states that "…economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project, through anticipated economic or social changes resulting from the project, to physical changes caused in turn by the economic or social changes. . . The focus of the analysis shall be on the physical changes." So, gentrification, which is a change measured using social and economic demographic criteria, is not a CEQA issue requiring discussion in the Draft EIR. Additionally, the Draft EIR did not speculate the extent to which indirect displacement of existing people or businesses could result in physical changes (e.g., secondary physical impacts, such as increased commute distances and their associated effects, resulting from

individual choices [or lack of choices] regarding where displaced people move to work and live). Quantification of these types of impacts in the Draft EIR would be overly speculative.

LA Metro's West Santa Ana Branch (WSAB) Project (and other transit improvements) are discussed in the Draft EIR to provide context for the existing and proposed transit system within and near the FFTOD Specific Plan Area. It is important to note that these are not improvements that are part of the Specific Plan and in most cases, such as with the WSAB Transit Corridor Project, Los Angeles County does not have authority over these improvements. Likewise, Los Angeles County is not required to address, study, or mitigate in the Draft EIR for the specific impacts of another jurisdiction's proposal, and in particular for those that are not physical effects on the environment and therefore not CEQA issues. As such, the Draft EIR does not analyze social- and economic-related topics such as gentrification, rent burden increases, etc. that could be associated with the WSAB Project.

While indirect displacement and gentrification are not analyzed in the Draft EIR, Los Angeles County did study these issues (and incorporate recommendations from study findings) as part of the development process of the Specific Plan itself. During preparation of the FFTOD Specific Plan, a "Community Atlas" and "Equity & Mobility Study" were created to document existing conditions specific to the TOD areas in Florence-Firestone. The Community Atlas noted that the existing uses in the TOD areas are not conducive to promoting transit-oriented development and provided a number of specific recommendations to support TOD development that form the foundation of the design standards and implementing actions for the Specific Plan. The Equity & Mobility Study combined conventional assessment of transportation conditions with an evaluation of equity conditions related to demographics, land use characteristics, and socioeconomic conditions, because the level of investment in transportation infrastructure and services is often a direct reflection of a community's socio-economic and demographic status. The study established equity goals, identified existing county-wide policies to support the goals, reviewed academic literature and identified best practices for advancing equity in transit-oriented development planning, assessed displacement risk within the FFTOD Specific Plan Area based on existing demographic and socioeconomic conditions, assessed conditions and trends for all travel modes, and provided a series of recommendations based on these findings. Equity recommendations included:

- Ensure current tenant, homeowner, and workforce protections are being used to their full potential and pursue additional policies to expand access to critical resources and infrastructure;

- Establish and reinforce long-term planning partnerships with community organizations;
- Align TOD land uses and densities with tailored needs for residents and businesses who may be most vulnerable to displacement; and
- Identify robust affordability policies and funding mechanisms that allow new development to successfully serve existing residents and businesses (due to the area's high overall housing cost burden).

The equity goals and recommendations were incorporated into the development of the Specific Plan standards. Through the Equity & Mobility Study key areas in Florence-Firestone were identified as having a higher risk of displacement than other areas. This displacement risk information was evaluated in the context of the Community Plan and County-established goals for the area, regional housing demand, and proximity to transit. As a result of this overarching evaluation, a tiered land use approach to transit-oriented development was developed to treat each TOD area individually. Uses, zoning/development standards, building heights, and incentives were all developed based on the tiered land use approach to promote areas of stability, areas of limited transition, and areas of focused growth. It is also important to note that the provision of affordable housing is an objective of the Specific Plan. Affordable housing is addressed by the Specific Plan through help implementing the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the Regional Housing Needs Assessment (RHNA).

A2-10 The FFTOD Specific Plan does not identify or propose any specific development projects. This Draft (programmatic) EIR is more conceptual than a project-specific EIR, and is not intended to focus on the site-specific construction details of each possible future development within the FFTOD Specific Plan Area. The Draft EIR identified generalized impacts and mitigation measures for a program-level decision. The FFTOD Specific Plan establishes transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops.

The Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the proposed FFTOD Specific Plan. As such, site-specific analysis of construction impacts will be performed as part of the second-tier environmental and County approval documents for each individual future development project pursuant to the FFTOD Specific Plan. Project-level activities and the construction activities associated with them will undergo future environmental analysis as required by CEQA and when tiering from this EIR.

Regarding parking, Senate Bill 743 Section 21099(b)(3) states that the adequacy of parking shall not support a finding of significance by itself.

Until 2013, parking analysis was often excluded in TIAs largely due to the case, San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656 (SFUDP). Following San Franciscans, in a more recent published case, Taxpayers for Accountable School Bond Spending v. San Diego Unified School District (2013) 1 Cal.App.4th, the court holds that parking is an environmental impact that needs to be considered under CEQA. The court's basic argument that parking should be considered in the impact analysis is summarized in the following excerpt from the decision.

> As Taxpayers notes, cars and other vehicles are physical objects that occupy space when driven and when parked. Therefore, whenever vehicles are driven or parked, they naturally must have some impact on the physical environment. The fact that a vehicle's impact may be only temporary (e.g., only so long as the vehicle remains parked) does not preclude it from having a physical impact on the environment around it. Therefore, as a general rule, we believe CEQA considers a project's impact on parking of vehicles to be a physical impact that could constitute a significant effect on the environment.

However, the court decisions are not the final word on whether parking impact analysis is required for CEQA analysis since Appendix G has been updated to exclude any parking reference and SB 743 included new statutory language that limits where parking impacts may be relevant.

> 21099(b)(3) This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section. [Emphasis added]
>
> 21099(d)(1) Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. [Emphasis added]

While parking issues are not analyzed in the Draft EIR, Los Angeles County recognizes the local importance of these concerns and has initiated a Parking Study for the Florence-Firestone Community as an immediate action resulting from the Specific Plan. This Study will include an inventory of the existing

parking in the Florence-Firestone Community and development of management strategies that address existing needs and future needs given the anticipated growth as a result of the Specific Plan.

Finally, regarding the deferred mitigation statement, no significant impacts were identified related to transportation, and therefore no mitigation actions (deferred or otherwise) have been identified for transportation. In addition, as described earlier, this Draft (programmatic) EIR is more conceptual than a project-specific EIR, with generalized impacts and mitigation measures for a program-level decision. The Draft EIR analysis is not intended to focus on the site-specific mitigation for each possible future development within the FFTOD Specific Plan Area. Rather, the Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the proposed FFTOD Specific Plan. As such, site-specific analysis of construction impacts will be performed as part of the second-tier environmental documents for each individual future development project pursuant to the FFTOD Specific Plan.

A2-11 Although the FFTOD Specific Plan does not directly create or provide any new open space, to address the community's feedback to increase publicly accessible open space, the FFTOD Specific Plan proposes open space standards for all new residential and mixed use developments. Each residential or mixed use development will be required to provide the minimum area of common and private open space based on type within each development as well as publicly accessible open spaces and signage. Specifically, these requirements are as follows:

- Studio unit requires 125 square feet of open space;
- 1 bedroom unit requires 150 square feet of open space;
- 2 bedroom unit requires 200 square feet of open space;
- 3+ bedroom unit requires 250 square feet open space;
- < 80,000 gross square feet (GSF) requires no open space;
- 80,000 > 119,999 GSF requires 2% of gross floor area (GFA);
- 120,000 > 159,999 GSF requires 3% of GFA;
- 160,000 > 199,999 GSF requires 4% of GFA; and
- 160,000 > 199,999 GSF requires 5% of GFA.

While Los Angeles County acknowledges in the Draft EIR the existing parkland-to-population ratio in the Specific Plan area is far below the County's goal standard, the impact to existing parks and recreation facilities was concluded in Section 3.13 Recreation of the Draft EIR to be less than significant based on a combination of the incorporation of open space in accordance with the

requirements of the FFTOD Specific Plan and the payment of in-lieu fees per Los Angeles County Municipal Code Section 21.28.140 (that would enable Los Angeles County to maintain a ratio of 3 acres of local parkland for every 1,000 residents per Section 21.24.340).

The payment of in-lieu fees required by the Los Angeles County Municipal Code ensures an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. The in-lieu fees are not a program proposed as part of the FFTOD Specific Plan. Comments regarding the allocation and timing of use of collected fees are opinions on the established in-lieu fee program that have been adopted by Los Angeles County to address parkland needs commensurate to increases in population and are not directly related to the adequacy of the Draft EIR. It should be noted that, as discussed in Section 3.13, the FFTOD Specific Plan area is almost entirely built out with urban uses. There is very little vacant unincorporated land that could be developed as parkland to serve the Florence-Firestone community. Nevertheless, as concluded in the Draft EIR, existing regulations ensure that future funding for parkland acquisition would be proportional to increases in population and cumulative recreation-related impacts would be less than significant. In addition, the Department of Parks and Recreation is always seeking out opportunities to acquire potential park space in the community. There is an adopted Community Parks and Recreation Plan for Florence-Firestone posted on the General Plan website – https://planning.lacounty.gov/generalplan/generalplan. The Department is currently working on the 92nd Street Linear Park within an existing utility corridor.

A2-12 This is a concluding summary of the comments contained in the letter; please refer to the detailed responses to individual comments, above. Los Angeles County appreciates CBE's review and comment of the Draft EIR and, overall, would like to reiterate that this Draft EIR is the first-tier environmental document that focuses on the effects of implementing the overall buildout of the FFTOD Specific Plan. The site-specific, construction-level analysis of future development projects pursuant to implementation of the FFTOD Specific Plan will be analyzed on a case-by-case basis within each subsequent second-tier document as relevant. Second-tier environmental documents would involve a CEQA-related public review period during which CBE and the community will have the opportunity to review and comment on the more specific and construction-level analysis and mitigation measures at that time.

**From:** Justin Maghen <jmaghen@gmail.com>
**Sent:** Monday, October 25, 2021 5:16 PM
**To:** Richard Marshalian <RMarshalian@planning.lacounty.gov>
**Subject:** FFTOD question

Richard,

When you have a chance, can you please direct me or get an answer to the following question about FAR:

What is the FAR for a MU zone in the new specific plan for all residential development? It says in the notes "Housing in a mixed use format shall be regulated by min. and max. densities, and subject to the max. FAR for the zone" but I still can't seem to find anywhere what the zones max FAR is. R1-1

Thanks in advance for your help.

Best,

Justin Maghen
818-231-7834

Lic. #: 01853540

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## R1. Response to Comments from Justin Maghen, dated October 25, 2021.

R1-1 Maximum floor area ratio (FAR) for the MU zone is 3.0, as listed in Table 22.420.050-B of the Public Review Draft (September 2021) of the Specific Plan. It should be noted that maximum FAR applies to non-residential and mixed use development that includes residential units. Residential units would be counted within the maximum FAR allowed if part of a mixed use development. However, residential only buildings in a mixed use zone are not subject to the FAR limits. Rather they are governed by the minimum/maximum density allowed per the zone, and eligible for density bonus beyond the maximum density noted in the zone.

**From:** Nellie Raygoza <marinely20@hotmail.com>
**Sent:** Friday, November 5, 2021 12:26 AM
**To:** Richard Marshalian <RMarshalian@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; DRP FFTOD <FFTOD@planning.lacounty.gov>
**Subject:** FFTOD Comment from community resident

The Los Angeles County Department of Regional Planning,

I recently became aware of the proposed rezoning for the Florence- Firestone community. I have lived in this area for over 30 years. Some of my friends and family own property in this area. I learned of the proposed rezoning by a small community group. I have talked with friends and family about these posssible changes and no one had heard or had an idea of these possibilities in changes to our community.

It looks like county regional planners have been creating and having proposal meetings without reaching out to home owners and people currently living in the community. I have looked at the proposed changes and I am dissappointed to know that regional planners are more than willing to cripple a community even more. It is the responsibility of the regional planners to inform the people living in the community properly of these changes! Why haven't we received any mail, postings on corners, schools, local churches and libraries (oh wait, Florence- Firestone has a bungalow as a library) regarding these proposals? R2-1

To start, Florence-Firestone already suffers from significant amount of crime. Building MEGA apartment buildings to this neighhood will only hinder even more the little quality of life that remains to hard working families living here.This community is already seeing its fair amount of MEGA apartment buildings and with these buildings we all have seen the troubles that it has brought with them. The proposed rezoning area is already over populated. The proposal will only allow rich developers do as they want with parcels without a care if we have the resources to have livable community. R2-2

ALL the streets mentioned in the proposed rezoning already have a serious parking issue. These streets are impacted by double-parked cars. Current residents already have issues finding parking close enough to where they live. I have witnessed altercations of people fighing for parking spaces. Yes, I know the regional planners will argue that these mega apartments will have accessible public transportation but in reality most people that use these don't actually live in the surrounding parameters. I have paid close attention to the people boarding the Metro rail system on Slauson and Florence and boarding the buses only to notice that most people are not Florence-Firestone residents. R2-3

I live in Florence-Firestone, I see what this poor community is already missing.I know the struggles those that live here already go through. We don't have parks, a library, a sports complex for kids to join clubs and play sports. Most properties don't have green space or even outdoor space. These buildings will only be making the R2-4

air quality even worse. No one wants to live next to a 3-5 story building. It's upsetting to know that the future of my community is in the hands of regional planners and board of supervisors -- people who do not live in this community or even care to do their job properly by informing us of these backdoor deals. As a resident I ask that you look into other communities with vacant lots to propose your ideas. Don't sell your ideas without even reaching out to the people who will be affected by your choices. Please have a conscience and realize that you are affecting people who don't even have a clue of what is going on.

R2-4 Cont'd

I hope that you will understand my opinion in this matter.

N. Raygoza

## R2. Response to Comments from Nellie Raygoza, dated November 5, 2021.

R2-1 Please refer to Master Responses I and II regarding Los Angeles County's intent for the proposed FFTOD Specific Plan and its outreach efforts during development of the Specific Plan, respectively.

Regarding notification of the environmental analysis of the FFTOD Specific Plan pursuant to CEQA, on March 15, 2021, Los Angeles County issued a Notice of Preparation (NOP) and Initial Study in accordance with CEQA Guidelines Section 15082 that was sent to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties. The NOP and Initial Study were circulated for 30 days, until April 14, 2021. An online public scoping meeting was held on March 25, 2021, at 5:00 p.m. via Zoom. The intent of the scoping meeting was to solicit written comments regarding the environmental issues that should be evaluated in the Draft EIR. Following completion of the Draft EIR, Los Angeles County submitted the Draft EIR to the State Clearinghouse on September 21, 2021. A Notice of Completion (NOC) was posted at the SCH on September 21, 2021 and a Notice of Availability (NOA) was posted at the Los Angeles County Clerk-Recorder's Office on September 21, 2021. The NOA was sent to interested individuals, federal, state, and local agencies, and posted on the project website at https://planning.lacounty.gov/fftod/Documents. The Draft EIR was released for a 45-day public review period, which commenced on September 21, 2021 and ended on November 5, 2021. Due to the COVID-19 Pandemic and closure of Los Angeles County facilities, the document was made available for review on Los Angeles County's website in electronic format and was available for download.

R2-2 Please refer to Master Response III regarding gentrification and indirect displacement. Regarding increased population, the FFTOD Specific Plan provides zoning that supports increased density/intensity. However, market studies conducted as part of the project indicated limited projected growth for the area based on current and immediately projectable conditions. While full buildout of the zoning established by the Specific Plan could result in substantial population increase, the actual population studied in the EIR is aligned with a lower estimated buildout per market study findings, resulting in a lower anticipate community population. And as discussed in Master Response I, the proposed FFTOD Specific Plan represents the culmination of Los Angeles County's efforts to establish transit-oriented development policy direction, development standards, and implementation programs of the TOD Program, FFCP policies, and broader sustainability goals of Los Angeles County. It is important to note that, in addition to increasing living and working opportunities near the three LA Metro transit stations within the community, the FFTOD Specific Plan would require standards

(e.g., wider sidewalks, open space, etc.) that are not currently required of new development in the community and would provide safer ways of moving around the community by walking, bicycling, rolling, and/or using transit. Additionally, as communities in southern California continue to grow and the need to strengthen the link between the built environment and transportation system increases (such as housing construction in transit rich areas), other state laws will guide overall development and provide for increased density in these areas, but without the community-specific standards and focus of the FFTOD Specific Plan. It is the intent of the FFTOD Specific Plan to increase housing and employment opportunities in a contextually sensitive manner that are targeted to the unincorporated area community of Florence-Firestone to allow for greater flexibility and focus in addressing local community interests. Future development projects that are consistent with the FFTOD Specific Plan policies and development standards will in turn be consistent with the General Plan and FFCP policies. See also Master Response IV regarding consideration of population and density in the Draft EIR.

Regarding the potential for crime as a result of future development, Section 3.12 Public Services of the Draft EIR identifies Los Angeles County's coordination with the Los Angeles Sheriff's Department (LASD) for the FFTOD Specific Plan. LASD calculates that buildout of the Specific Plan would require approximately 42 additional deputies to serve the FFTOD Specific Plan Area, funding for which would be derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.) that future development of the Specific Plan would contribute to. Additionally, individual future development projects would be reviewed by Los Angeles County and LASD staff prior to a developer's receipt of permits to ensure that appropriate security measures are included in each development (i.e., the general principles of Crime Prevention Through Environmental Design [CPTED]) and would be required to pay all applicable required law enforcement mitigation fees associated with the individual project. CPTED would reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior while encouraging the legitimate uses of the site including defensible space, territoriality, surveillance, lighting, landscaping, and physical security.

R2-3 Please refer to Master Response V regarding parking issues.

R2-4 Please see responses to comments R2-1 and R2-2, above. Regarding open space, the FFTOD Specific Plan proposes open space standards for all residential and mixed use developments. Each residential or mixed use development will be required to provide the minimum area of common and private open space based

on type within each development as well as publicly accessible open spaces and signage. Specifically, these requirements are as follows:

- Studio unit requires 125 square feet of open space
- 1 bedroom unit requires 150 square feet of open space
- 2 bedroom unit requires 200 square feet of open space
- 3+ bedroom unit requires 250 square feet open space
- < 80,000 gross square feet (GSF) requires no open space
- 80,000 > 119,999 GSF requires 2% of gross floor area (GFA)
- 120,000 > 159,999 GSF requires 3% of GFA
- 160,000 > 199,999 GSF requires 4% of GFA
- 160,000 > 199,999 GSF requires 5% of GFA

While Los Angeles County acknowledges in the Draft EIR the existing parkland-to-population ratio in the Specific Plan Area is far below the Los Angeles County goal standard and that there is very little vacant unincorporated land that could be developed as parkland to serve the Florence-Firestone community, the impact to existing parks and recreation facilities was concluded in Section 3.13 Recreation of the Draft EIR, to be less than significant based on a combination of the incorporation of open space in accordance with the requirements of the FFTOD Specific Plan and the payment of in-lieu fees per Los Angeles County Municipal Code Section 21.28.140 (that would enable Los Angeles County to maintain a ratio of 3 acres of local parkland for every 1,000 residents per Section 21.24.340). The payment of in-lieu fees required by the Los Angeles County Municipal Code ensures an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. In addition, the Department of Parks and Recreation is always seeking out opportunities to acquire potential park space in the community. There is an adopted Community Parks and Recreation Plan for Florence-Firestone posted on the General Plan website – https://planning.lacounty.gov/generalplan/generalplan. The Department is currently working on the 92nd Street Linear Park within an existing utility corridor.

Regarding air quality-related impacts, assumptions used to estimate potential construction-related emissions from buildout of the FFTOD Specific Plan are conservative (i.e., assumed that up to 25 percent of all land uses within the FFTOD Specific Plan Area could be developed within the earliest possible construction year). With these assumptions, it was determined that construction-related emissions could exceed significance thresholds and, that this impact is significant and unavoidable. For operations-related emissions, although implementation of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce vehicle miles traveled (VMT) which would reduce overall operational emissions emission estimates, the operational

emissions would continue to exceed the South Coast Air Quality Management District (SCAQMD) thresholds of significance. In addition, because the specific development projects within the FFTOD Specific Plan Area cannot be defined at the time of this analysis, precise effectiveness and feasibility of additional measures cannot be determined for individual future projects, and operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. Therefore, this impact was also determined to be significant and unavoidable. However, programmatic mitigation measures included in the Draft EIR are intended to address emissions from future development projects pursuant to implementation of the FFTOD Specific Plan. These measures will be used as starting points to determine their applicability to each future development project and to develop additional and/or more specific mitigation measures (as necessary) as part of their subsequent project-level (second-tier) environmental analyses. The measures identified (including use of Tier 4 Final emissions standards [see MM AQ-1], fugitive dust control [see MM AQ-2], use of super-compliant low volatile organic compound (VOC) paints [see MM AQ-3], etc.) would reduce construction-related emissions. Additionally, other programmatic mitigation measures ensure that applicants for future development projects will include, as part of their second-tier environmental analyses pursuant to CEQA, project-specific modeling of localized emissions and, when applicable, site-specific health risk analysis, which will result in additional specific mitigating actions to reduce construction- and operation-related emissions; see MMs AQ-4 and AQ-6 for lists of what some of these actions would/could include.

**From:** Myrna Ray <mimiray2003@gmail.com>
**Sent:** Friday, November 5, 2021 12:27 PM
**To:** Patricia Hachiya <phachiya@planning.lacounty.gov>
**Subject:** Florence/Firestone Re-Zoning Planning

To Whom It May Concern:

As it was brought to my attention the zoning changes planned for our community will impact our Florence/Firestone area in a negative way. We are already dealing with inconveniences and these changes will worsen our current conditions. We have parking issues, littering, mobile homes parked around schools and residential areas. These are just a few issues mentioned. By adding more living space our community will be overcrowded causing poor living conditions for neighbors. Please reconsider zoning plans for the people of the Florence/Firestone community. R3-1

Cordially,

Myrna Ray

## R3. Response to Comments from Myrna Ray, dated November 5, 2021.

R3-1 The commenter requests reconsideration of the zoning plans associated with the FFTOD Specific Plan. The comment mentions existing issues tied to parking, littering, and mobile homes and concerns of overcrowding as a result of the addition of more housing.

The commenter's request is noted and is included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. Please refer to Master Responses I, IV, and V regarding Los Angeles County's intent for the proposed FFTOD Specific Plan, population/density increase, and parking, respectively. While the intent of the FFTOD Specific Plan (e.g., provide more opportunities for affordable housing, encourage transit oriented development [TOD], promote active transportation, improve access to transit, and reduce vehicle miles traveled) would increase housing and population density, it represents the culmination of Los Angeles County's efforts to establish transit-oriented development policy direction, development standards, and implementation programs of the TOD Program, Florence-Firestone Community Plan (FFCP) policies, and broader sustainability goals of Los Angeles County. The addition of more affordable housing and increasing the different types of housing that would be available to residents is a strategy for managing overcrowded individual housing units. It is important to note that, in addition to increasing living and working opportunities near the three LA Metro transit stations within the community, the FFTOD Specific Plan would require standards (e.g., wider sidewalks, open space, etc.) that are not currently required of new development in the community and would provide safer ways of moving around the community by walking, bicycling, rolling, and/or using transit. This strategy could also offer residents and employees other alternatives for moving around the community aside from the standard single-occupancy vehicle. Additionally, as communities in southern California continue to grow and the need to strengthen the link between the built environment and transportation system increases (such as housing construction in transit rich areas), other state laws will guide overall development and provide for increased density in these areas, but without the community-specific standards and focus of the FFTOD Specific Plan. It is the intent of the FFTOD Specific Plan to increase housing and employment opportunities in a contextually sensitive manner that are targeted to the unincorporated area community of Florence-Firestone to allow for greater flexibility and focus in addressing local community interests.

C/O Richard Marshalian

Department of Regional Planning

I am a long-time resident of the Florence-Firestone, specifically in the area where the RSS Residential Slauson Station zone change will be implemented. I found out about the plan by accident when I searched online about what was being built on 1708 E 61st Street. This has been a noisy and lenghly project that has caused disruption with stay-at-home orders and for those working from home or doing classes virtually. I was appalled to learn that a four-story building was allowed to be built in such a narrow street. This area is already densely populated and terribly neglected by LA County; I'm extremely disturbed that more of these types of structures are going to be allowed. R4-1

The proposed change of single-family residence lots to the proposed RSS Residential Slauson Station H100 is both ridiculous and unfair to those who currently live in the area. The area will inevitably become a free-for-all for outside developers who will most certainly outbid potential home buyers in the area, most of which are people of color, thus keeping them out of home ownership. Current home owners will be confronted with pressure to sell if a developer offers a generous amount and this will cause displacement of current renters. These developers will buy up homes, consolidate parcels, and build market-rate units that will be out of reach to the current renters. Home ownership will be a thing of the past in this area and that's not a good thing. R4-2

I'm aware that the county is faced with pressure to fill housing supply due to the shortage of housing and homelessness, but the inevitable displacement of existing residents and a disruption in our quality of life should be taken into consideration when making drastic proposed changes. Proposing to build up to six-story buildings on our narrow streets without taking in consideration to parking, current traffic, noise levels, emergency access, visual character, and privacy seems careless. Allowing tall buildings next to single-family homes will not ensure compatibility with the existing neighborhood character. The county should instead look into changing the zoning areas of where dilapidated businesses are currently located such as Slauson, Alameda, Wilmington, and Randolph, **not** where existing homes are located. R4-3

I have provided photographs of the area where people have to walk to Slauson Metro Station. The area is simply not safe and it has to do with the businesses around that area; that is only where the zoning changes should be done. This would avoid displacement of people and will allow buildings to be built near wide streets. R4-4

As I look at the proposed changes more closely, it angers me how at the Firestone Station area, there will be no changes at all even though there's clearly a Metro Station there as well. During the few meetings it was mentioned that this area is being kept on Low Medium 1 to discourage larger developer projects to promote neighborhood stability and quality of life for those who live there. Why can't we be afforded the same courtesy? Comments such as "It's just five blocks and it will take time for changes" are both dismissive and disrespectful. R4-5

Lastly, the Community Feedback Worksheets did not show a full picture of the intentions of this project; if anything, they were misleading. It showed ADUs, triplex, fourplex, courtyard homes, and small lot R4-6

developments, yet RSS Residential Slauson Station allows up to five stories and 50 to 150 max. Also, I'm guaranteed that the residents that will be affected the most are not even aware of the changes. The webinar only had 27 attendees and only 152 worksheets were submitted. This was not due to the lack of interest but rather from them not being aware. There could have been mailers sent out and even home visits to received actual feedback from the residents. The demographics of the community should've been taken in consideration.

R4-6 Cont'd

I enjoy walking through the neighborhood and looking at the orange trees and small gardens which provide much needed oxygen to an area surrounded by recycling centers and trains. Allowing buildings that will not require greenery, underground parking, while not holding businesses to higher standards is not making the community better. Thank you for taking your time to read my important concerns.

R4-7

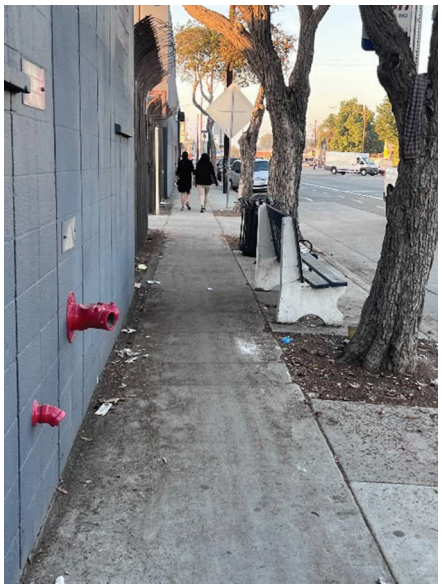
Regards,

Mari Garcia

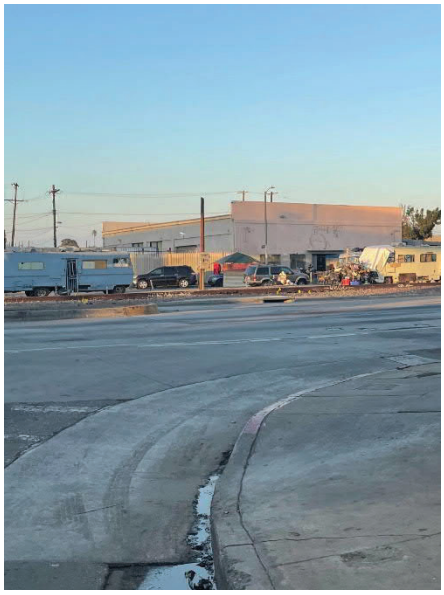
**Photo Attachments Referenced in Comment R4-4**



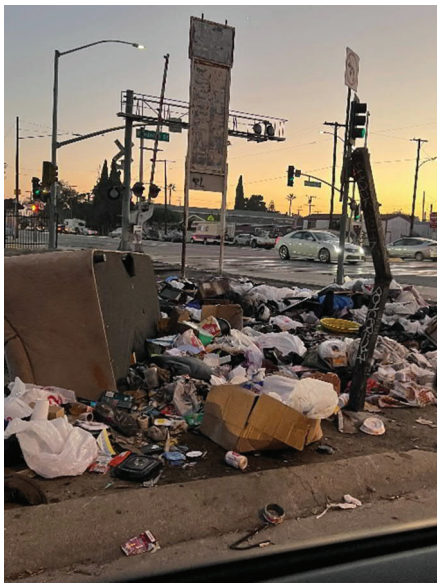
Holmes towards Slauson station



Holmes towards Slauson

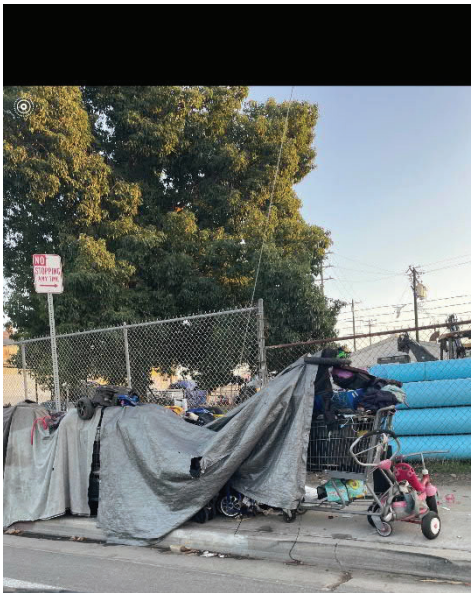


Next to Slauson station

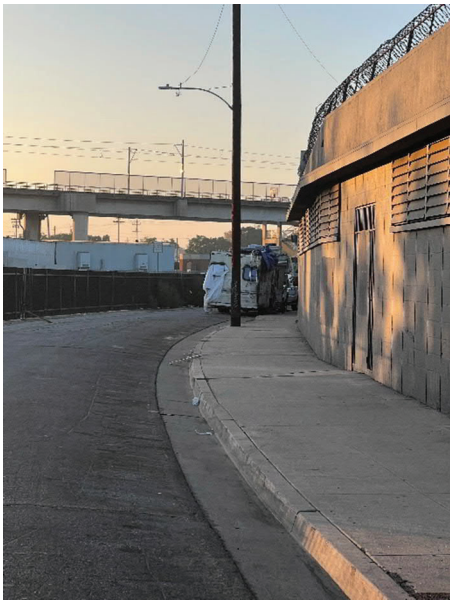


Randolph and Holmes

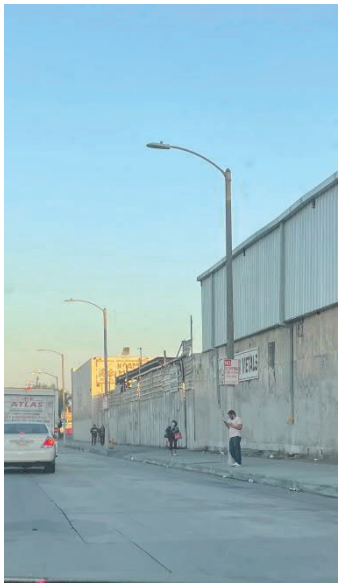
**Photo Attachments Referenced in Comment R4-4**



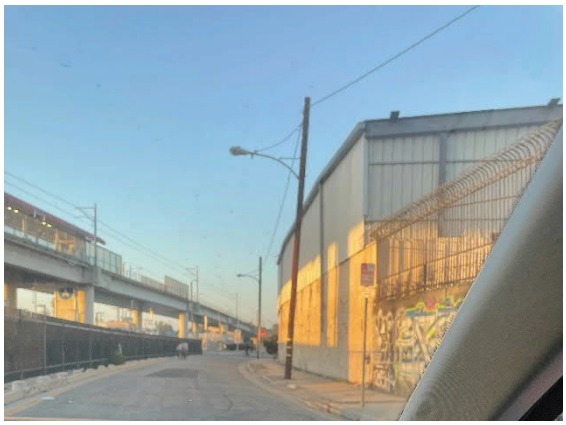
Randolph and Wilmington



RV Randolph



Slauson Ave



Slauson station through randolph

## R4. Response to Comments from Mari Garcia, dated November 5, 2021.

R4-1 Please refer to Master Responses I and II regarding Los Angeles County's intent for the proposed FFTOD Specific Plan and its outreach efforts during development of the Specific Plan, respectively.

R4-2 Refer to response R4-1, above, and to Master Response III regarding Los Angeles County's consideration and efforts for protecting existing residents from displacement, gentrification and indirect displacement in general and as it relates to CEQA.

R4-3 Please refer to responses R4-1 and R4-2, above. The FFTOD Specific Plan does not identify or propose any specific development projects. It establishes transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. The Draft EIR analysis is not intended to focus on the site-specific construction and operation details of each possible future development within the FFTOD Specific Plan Area. Rather, the Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the proposed FFTOD Specific Plan. The Draft EIR considers current and future traffic (see Section 3.14 Transportation), noise levels (see Section 3.10 Noise), emergency access (see Section 3.7 Hazards and Hazardous Materials and Section 3.14 Transportation), and aesthetics and visual character (see Section 3.1 Aesthetics). Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from the Program EIR.

The commenter's statements regarding building heights and the focusing of zoning changes to specific corridors only are noted and included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors.

Regarding parking, please refer to Master Response V.

R4-4 Thank you for providing these photographs. The Slauson Station TOD area concept of the Specific Plan focuses on increasing mixed use opportunities that can combine employment, retail, and housing close to the station. Focusing new development potential in this area would take advantage of the public improvements in the area including the Rail to River corridor on the north side of Slauson Avenue and the future West Santa Ana Branch line that will also use the Slauson Station. For this reason, the Specific Plan envisions the highest intensity development occurring within the Slauson Station TOD area to support adjacent

land use changes in the City of Los Angeles and to utilize the plan area's largest infill development opportunity sites.

This concept would allow existing industrial and commercial properties near the station to be redeveloped as mixed use at a higher intensity, increase how many homes are allowed in walking distance to Slauson Station, and introducing newer forms of industrial and employment through 'industrial flex' uses in areas where traditional industrial uses currently operate. The Plan will allow a wide range of housing types including duplexes, Accessory Dwelling Units (ADUs), triplexes, fourplexes, courtyard homes, multi-family, and small lot developments in the "More Housing Options" areas. The "TOD Mixed Use / Jobs Area" will extend to Compton Avenue and Holmes Avenue to create a connected TOD area around the station, allowing for a range of service and entertainment uses, and incentivize uses such as childcare and grocery stores, which are prioritized based on community input.

To enhance multi-modal access within the Slauson Station TOD area, the concept envisions improved wayfinding signage and street crossings, bicycle-supportive infrastructure along Miramonte Blvd., and a formalized pathway from 60th Street to Slauson Station where pedestrians currently travel in uncomfortable and hazardous conditions.

R4-5 The FFTOD Specific Plan includes changes within the Firestone Station TOD. The Firestone Station TOD area concept of the Specific Plan focuses on creating stability and flexibility for existing residents and business owners and increasing neighborhood services and housing options along major corridors. In response to community concerns around displacement and loss of critical neighborhood resources, the concept reinforces the amount of homes already allowed in the area while creating flexibility for owners to improve their residential properties. This intentional calibration of density and mixed use intensity is expected to result in a lower level of overall change in the Firestone Station TOD area.

In the Equity & Mobility Study's socioeconomic analysis, residents in the Firestone Station TOD area (neighborhood south of Nadeau) were found to be at the highest risk of displacement if rents increase and/or large-scale redevelopment occurs. To help preserve the stability of these residential neighborhoods while still adding much-needed housing options, the concept encourages conversion of existing homes to duplexes, and the addition of ADUs on existing single-family lots within the "More Housing Options" areas. In the "TOD Mixed Use / Jobs" areas along the Firestone and Compton corridors, neighborhood-scaled mixed use will be allowed to support additional housing near transit, services, and public amenities at Washington Park.

Community feedback indicated a preference for duplexes (two homes in one building) and adding ADUs to existing lots. As a result of these findings and feedback, the 'More Housing Option' a new zone was developed for the areas in the Firestone Station TOD to enable existing owners to add or legalize ADUs, make expanding existing homes easier, and disincentivize lot consolidation or larger-scale developments.

Refer to Response R4-4 regarding the Slauson Station TOD concept, its development approach reasoning, and some of the community input that helped inform the concept. The existing access and walkability conditions around the Slauson Station are one of the motivating reasons to create the Specific Plan. The Specific Plan establishes a revised approach to allowed land uses, development standards, and improvements that development would be required to provide in the area to improve the access and walkability conditions in the area. The Specific Plan also includes recommendations for multi-modal improvements to improve access to the station. Zoning changes under the Specific Plan are focused in this area, with lower levels of zoning changes proposed in the other two TOD areas. Los Angeles County would like to iterate that development of the Specific Plan, and the efforts to involve the community in its development, was intended to be inclusive, as Los Angeles County values all input from its community members.

R4-6 While the Community Feedback Worksheets did encourage responders to indicate their preference of which type(s) of homes they preferred for the community based on the list described in this comment (see page 5 of the worksheet), these informational packets did discuss and depict the range of buildings that could be developed based on zoning. Pages 3 and 6 of the Community Feedback Worksheets discussed the taller buildings that would be able to encourage additional homes, uses, and services, and the locations of larger lots where these new buildings could be implemented. The graphic at the bottom of page 3 shows the taller buildings and the map on page 6 shows where zoning would allow for them. The intent of the Community Feedback Worksheets was to solicit feedback on a variety of use, building type, and mobility improvements. Feedback on the home types preferred were used to develop the zoning standards in the Florence and Firestone TOD areas; all residential zones in Florence-Firestone will continue to allow addition of ADUs.

R4-7 Thank you for your comments. The FFTOD Specific Plan outreach activities highlighted that Florence-Firestone community members want to see more landscaping and trees. Overall greening has many benefits, including promoting sustainability, climate resilience, and comfort for people walking. Shade provided by tree canopies can promote walkability by decreasing the urban heat island effect and enhancing the street environment. The FFTOD Specific Plan requires

new development install street trees, creating more opportunities for shade and greening (i.e., 1 street tree shall be required per every 30 feet of street frontage for private development in MU and IX zones over 6,000 square feet in gross floor area [GFA] and a minimum of 2 trees shall be planted for every 800 square feet of public open space).

Please also note the FFTOD Specific Plan proposes open space standards for all residential and mixed use developments. Each residential or mixed use development will be required to provide the minimum area of common and private open space based on type within each development as well as publicly accessible open spaces and signage. Specifically, these requirements are as follows:

- Studio unit requires 125 square feet of open space
- 1 bedroom unit requires 150 square feet of open space
- 2 bedroom unit requires 200 square feet of open space
- 3+ bedroom unit requires 250 square feet open space
- < 80,000 gross square feet (GSF) requires no open space
- 80,000 > 119,999 GSF requires 2% of GFA
- 120,000 > 159,999 GSF requires 3% of GFA
- 160,000 > 199,999 GSF requires 4% of GFA
- 160,000 > 199,999 GSF requires 5% of GFA

From: Abe Ray <araygoza7070@gmail.com>
Sent: Saturday, November 6, 2021 2:24 PM
To: DRP FFTOD <FFTOD@planning.lacounty.gov>; Richard Marshalian <RMarshalian@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>
Subject: Florence-Firestone Rezoning concerns

CAUTION: External Email. Proceed Responsibly.

To whom it may concern,

I am deeply saddened to hear of the rezoning of the Florence Firestone community. I would be dishonest if I said I am surprised. I take the news as a symbolic final nail in the rotten coffin the community I grew up in has become.

I will keep this email brief as I know you have more present issues to attend to.

I have called Florence-Firestone my home for the last three decades. I have seen the community go through many transitions. The people in this community are mostly made up of immigrant Latinos who came to the United States in hopes of a better life for themselves and their children. The people of this community are no strangers to poverty and oppression, but I assure you they are resilient folks. R5-1

The plans to rezone North of Florence Ave to make way to construct buildings in lieu of investing in the homeowners and business is a direct attack on the Latino community. While my claim might seem like an exaggeration, the ramifications of these plans will affect the current and future residents of this community. I am sure you are familiar with the disbanding of the former Florence Library and what consequences it is having on our youth.

My first concern is having five story buildings in what is designed to be small home residential streets. Parking on any given street at any given time is atrocious. Each dwelling is already responsible for a minimum of three vehicles. Double parking has become a normality. I will not even mention the recreational vehicle problem, which is another grievance I will address at another time. The newly constructed building on 61st is a prime example of the negativity a building of this size brings. R5-2

Florence-Firestone is not synonymous with the word safe, just a couple of weeks ago a local business and its patrons were held hostage a stone away from an Elementary school. Constructing buildings and stuffing them with people will only increase crime. I am sure you have done your due diligence and researched what buildings like the one you have proposed are known to fester crime. With the defunding of the police I can assure you this will be a recipe for disaster. R5-3

I have heard your reasoning why you think the construction of buildings for housing would be an innovative idea, but I guarantee you this would be one of the most detrimental events that can happen to this community. Even though, it is not as polarizing as the construction of Dodger Stadium on Chavez Ravine, it is of the same magnitude for the Florence-Firestone residents. R5-4

I have many other concerns, but as promised I will keep it short. I hope you have made it this far. I appreciate your valued time and hope you reflect on these concerns. I know I am not the only one who feels this way and if the residents of the community were thoroughly informed of these plans I know they would too. R5-5

Thank you.
Abel Raygoza

## R5. Response to Comments from Abel Raygoza, dated November 5, 2021.

R5-1 These are introductory statements identifying the commenter's primary concern regarding the FFTOD Specific Plan, particularly the northern portion of the Specific Plan area (north of Florence Avenue). The commenter characterizes the proposed rezoning as an attack on the Latino Community.

The commenter's statements are noted and included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. Please refer to Master Responses I and III regarding Los Angeles County's intent for the proposed FFTOD Specific Plan and Los Angeles County's consideration and efforts for protecting existing residents from displacement, gentrification and indirect displacement in general and as it relates to CEQA.

Regarding the Florence Library, please refer to Master Response VI. **[**.

R5-2 Please refer to Master Response V regarding parking.

R5-3 Section 3.12 Public Services of the Draft EIR identifies Los Angeles County's coordination with the Los Angeles Sheriff's Department (LASD) for the FFTOD Specific Plan. LASD calculates that buildout of the Specific Plan would require approximately 42 additional deputies to serve the FFTOD Specific Plan Area, funding for which would be derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.) that future development of the Specific Plan would contribute to. Additionally, individual future development projects would be reviewed by Los Angeles County and LASD staff prior to a developer's receipt of permits to ensure that appropriate security measures are included in each development (i.e., the general principles of Crime Prevention Through Environmental Design [CPTED]) and would be required to pay all applicable required law enforcement mitigation fees associated with the individual project. CPTED would reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior while encouraging the legitimate uses of the site including defensible space, territoriality, surveillance, lighting, landscaping, and physical security.

R5-4 Please refer to Master Responses I, II, and III. The commenter's statements are noted and included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors.

R5-5 Thank you for your comments; they have been noted and included in the Final EIR for the decision-makers' consideration.

**From:** Ashley Orona <oronash@gmail.com>
**Sent:** Friday, November 5, 2021 3:04 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>; Richard Marshalian <RMarshalian@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>
**Subject:** Written comments for FFTODSP Draft EIR

My name is Ashley Orona, I am a resident and constituent of unincorporated Florence-Firestone. Below is my public comment for the FFTODSP EIR.

- I request to limit zoning changes to stay within the 0.5 mile TOD radius and not extend outside
    - The FFTODSP proposes zoning changes that will affect the areas within a 0.5 mile radius of transit stations ; therefore, the zoning changes ("More Housing Options" and "TOD Mixed Use / Job Areas") should be limited to happening within the 0.5 mile radius as mentioned in the plan and not extend outside of that radius, as seen on this map(Draft map on page [3-4]). Changing the zoning has the potential of accelerating gentrification. It was mentioned that the reason that the reason there was zoning outside of the 0.5 mile radius was to decrease the effect of "spot zoning," but we don't think this is a valid argument. R6-1
- The Florence TOD area should have the same consideration as the Firestone TOD with regards to the lower overall change in land use and zoning and being considered vulnerable to displacement
    - They classified Firestone as more vulnerable to displacement using the maps in the Mobility and Equity Study such as number of households with cost burden >30% and >50%, which show that the burden is higher in the Firestone TOD Area and lower in the Florence TOD area. However, there is another map that still shows that in the Florence TOD area, the number of renter households are still high - 60%, 69%, 70% and 55%, which are comparable to the Firestone TOD area. The high number of renters in the Florence TOD area means they will be vulnerable to displacement once there are sweeping zoning changes made that will motivate landlords and developers to build in the TOD area. If the only reason to upzone in the Florence TOD area is because it is our "downtown" and a hub, we don't think that's a good enough reason to. Both the Florence and Firestone area are vulnerable to displacement. R6-2
- Building height for mixed use commercial corridors
    - No more that 3-4 floors for mixed use, concerns with privacy for single family homes and blocking out light R6-3
- I am concerned about rezoning residential areas. We have seen too many times developers penetrate low income communities of color and buy properties to redevelop into duplexes/triplexes/etc., buying them above the asking price, not allowing local residents a chance at becoming homeowners, flipping homes and renting/ selling them at a price that pushes residents out of the community because it is just too expensive. Protections need to be put into place that allows developers to. Homeowners may not have the money/resources to build their own properties to include more units, developers would be the ones mostly benefiting from this zoning change. Also, a large number of residents in Florence-Firestone are residents with property owners living out of the community, if property owners wish to re-develop their property, renters are at risk of being displaced. R6-4

- The Impact Summary and Programmatic Mitigation table states that the “project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly...,” it is considered “less that significant impact) and therefore no mitigation measure is recommended. However, members of the community believe this is a highly inaccurate underestimation in the impact this project will have on the infrastructure in this community and displacement/ migration of people. The premise of this project is based on allowing and streamlining transit-oriented development opportunities for affordable housing and commerce. R6-4 Cont'd

- I request that the list of buildings below be looked into as part of the Historic Resources Survey that Los Angeles County will be conducting in Florence-Firestone. I also request that the county consider NOT rezoning parcels where buildings of significant importance to the community are located.
  - List of historic buildings/ sites:
    - Florence Car Wash
      - 1662 E. Florence Ave. or 7220 Maie Ave. Los Angeles, CA 90001
    - Bridge at Roosevelt Park
      - Across the train tracks approximately between 1672 E. 76th St and 7600 Graham Ave. Los Angeles, CA 90001.
    - Gentry Theater by architect S. Charles Lee
      - 6525 Compton Ave. Los Angeles, CA 90001
    - Storybook house on Firestone Blvd.
      - 2181 Firestone Blvd. Los Angeles, CA 90001
    - Graham Library
      - 1900 E. Firestone Blvd. Los Angeles, CA 90001 (current location)
      - 1925 E. 87th St. Los Angeles, CA 90002 (former location)
      - 8511 Holmes Ave. Los Angeles, CA 90001 (former location)
    - The Century Youth Activities League (formerly the Firestone Park Sheriff's station) by architect James H. Garrott R6-5
      - 7901 Compton Ave. Los Angeles, CA 90001 - current location of Century Youth Activities League
      - 2201 E. Firestone Blvd. Los Angeles, CA 90001 - second location of Firestone Park Sheriff's station
      - 1551-1555-1557 E. Florence Ave. (1st location of Firestone Park station; also former locations of the Florence Library and Florence-Firestone Chamber of Commerce)
    - Tessie Cleveland Community Services Corporation by architect James H. Garrott
      - 8019 Compton Ave. Los Angeles, CA 90001
    - The Youth Activities League on Makee
      - 7116 S. Makee St. Los Angeles, CA 90001
    - The Miramonte Blvd. Palm trees
      - Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south)
    - Harrison-Ross Mortuary
      - 1839 Firestone Blvd. Los Angeles, CA 90001

## R6. Response to Comments from Ashley Orona, dated November 5, 2021.

R6-1 The commenter requests zoning to be limited to within 0.5 mile of existing Metro A (Blue) Line Stations (i.e., the 0.5-mile TOD radius) only and not to allow zoning changes outside of the radius, which the commenter states will limit acceleration of gentrification. The majority of the proposed zone changes are within the three TOD radii; areas outside of a TOD radius were included for zoning consistency and to avoid (to the extent reasonable) change of zoning mid-block or mid-parcel. The comment is noted and is included in the Final EIR for the decision-makers' considerations as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. It should be noted that the Draft EIR does consider an alternative that limited all land use and zoning changes to within the 0.5-mile TOD radius of the Slauson Station (see Alternative 3: Slauson TOD Focused); refer to Section 4.0 Alternatives of the Draft EIR.

As noted, areas outside of a TOD radius were primarily included for zoning consistency and to avoid (to the extent reasonable) change of zoning mid-block or mid-parcel which could be construed as 'spot zoning'. The largest area proposed for rezoning outside a TOD radius is the residential neighborhood at the north west corner of Florence-Firestone bounded by Hooper Avenue to the east, 58th Drive on the north, S Central Avenue to the west, and 61st Street to the south. This area was included in the rezoning as it is current the same zoning as the neighborhood east of Hooper Avenue, therefore it was included for consistency purposed and to create a better transition from the commercial properties along S Central Avenue and Slauson Avenue.

Please also refer to Master Response I regarding Los Angeles County's intent for the proposed FFTOD Specific Plan.

R6-2 The Equity & Mobility Study's socioeconomic analysis determined that residents in the Firestone Station TOD area (specifically the neighborhood south of Nadeau) were found to be at the highest risk of displacement if rents increase and/or large-scale redevelopment occurs. While additional specific protection to preserve the stability of these residential neighborhoods (while still adding much-needed housing options) was included as part of the concept for the Firestone TOD area, it was recognized that the Firestone Station TOD area was not the only location within the FFTOD Specific Plan with displacement vulnerabilities. Equity recommendations derived from the Equity & Mobility Study helped to frame and refine the community outreach approach and Specific Plan standards. Equity recommendations included:

- Ensure current tenant, homeowner, and workforce protections are being used to their full potential and pursue additional policies to expand access to critical resources and infrastructure
- Establish and reinforce long-term planning partnerships with community organizations
- Align TOD land uses and densities with tailored needs for residents and businesses who may be most vulnerable to displacement
- Identify robust affordability policies and funding mechanisms that allow new development to successfully serve existing residents and businesses (due to the area's high overall housing cost burden)

Proposed zoning changes within the Florence Station TOD area are not just as a downtown/hub; the project is a specific plan to establish transit-oriented development policy direction, development standards, and implementation programs with specific focus on all three LA Metro transit stations within the Florence-Firestone Community.

The Florence Station TOD area concept focuses on supporting and increasing neighborhood services, employment, and more homes near the Florence Station. The concept envisions a variety of uses and housing options similar to those around Slauson Station, however the allowed heights and the number of homes per acre are lower to harmonize the scale of infill development with existing neighborhoods surrounding Florence Station. As a centrally located corridor with "main street"-style buildings and a vibrant variety of small businesses, cultural landmarks and public art, Florence Avenue serves as the heart of the Florence-Firestone community. The concept intends to reinforce and enhance the "Florence Mile" as an active mixed-use corridor and central destination with a wealth of small retail and dining businesses, neighborhood services, and housing options. The plan will allow a wide range of housing types including duplexes, ADUs, triplexes, fourplexes, courtyard homes, multi-family, and small lot developments in the "More Housing Options" areas. Medium-density mixed-use development opportunities – including the prioritized childcare and grocery stores uses - will be introduced near the transit station along Florence Avenue, Compton Avenue, Nadeau Street, and the Metro A Line (Blue) south of Florence Avenue in the "TOD Mixed Use / Jobs" areas.

R6-3 The commenter requests no more than three to floor floors for building heights in mixed use commercial corridors, noting privacy and shade/shadow concerns. The comment is noted and is included in the Final EIR for the decision-makers' considerations as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors.

For reference, as discussed in Section 3.1 Aesthetics of the Draft EIR, the zoning regulations of the FFTOD Specific Plan would regulate the visual character and quality of the FFTOD Specific Plan Area through residential unit densities (ranging from 18 to 100 dwelling units per acre depending on zone), maximum building heights (e.g., tallest being 72 feet [6 stories] for mixed use zones [e.g., Mixed-Use Transit] and 65 feet [5 stories] for residential zones [e.g., Residential Slauson Station]), fence/wall standards, open space, landscaping, sidewalk requirements, setbacks and stepbacks, transparency and type of materials, modulation standards, pedestrian design, (including public art and lighting), architectural elements, signage, materials/colors, etc. These urban design standards of the FFTOD Specific Plan would provide a comprehensive approach to high quality design for the physical design of the FFTOD Specific Plan Area and would serve to upgrade and improve the aesthetic appearance of existing buildings, open space areas, and other site improvements through architectural and landscape improvements to enhance the overall visual character of the FFTOD Specific Plan Area.

R6-4 The commenter notes overall concerns regarding the rezoning of existing residential areas and cites vulnerability of low income and minority communities and renters to displacement from developers and future redevelopment in general. The commenter requests protection for existing homeowners and renters. These comments are noted and included in the Final EIR for the decision-makers' considerations as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors.

Refer to response R6-2 regarding the Equity & Mobility Study that was part of the preparation of the FFTOD Specific Plan. The Mobility & Equity Study combined conventional assessment of transportation conditions with an evaluation of equity conditions related to demographics, land use characteristics, and socioeconomic conditions, because the level of investment in transportation infrastructure and services is often a direct reflection of a community's socio-economic and demographic status. The study established equity goals and identified existing county-wide policies to support these goals, identified best practices for advancing equity in TOD planning, assessed displacement risk within the FFTOD Specific Plan Area, assessed conditions and trends for all travel modes, and provided a series of recommendations based on these findings.

Additionally, this comment notes disagreement with the overall conclusion from the Draft EIR that the project would not induce substantial unplanned population growth. Please refer to Master Response IV regarding consideration of population and density within the Draft EIR.

R6-5 The commenter has provided a list of buildings/sites and requests they be included/investigated as part of a historic resources survey for the Florence-Firestone Community. The list is similar to the list provided by the commenter in a letter in response to the Notice of Preparation (NOP) of the Draft EIR (see Table 1.1 Summary of Comments in Response to the NOP and Initial Study of the Draft EIR) that was included in the Draft EIR as Table 3.3-6 FFTOD Specific Plan Area Cultural Resource Properties Identified Through Public Outreach Efforts.

The Draft EIR recognizes that historic structures and sites that are eligible or potentially eligible for National Register of Historic Places (NRHP) listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant. The determination of feasibility will occur on a case-by-case basis as future development applications on sites containing historic structures are submitted. In addition, some structures that are not currently considered for historic value (because generally, they must be at least 50 years old) could become worthy of consideration during the planning period for the project (i.e., during the horizon year of 2035). While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact. However, the actual impact to cultural resources will be determined on a case-by-case basis within each subsequent project-level, second-tier document, which would involve a CEQA-related public review period during which CBE and the community will have the opportunity to review and comment on the more specific and construction-level mitigation measures at that time.

At this time, Los Angeles County is only able to identify and prescribe future protection for cultural resources via professional assessment and identification of general treatment standards, recordation procedures, and construction monitoring requirements (refer to MMs CUL-1 through CUL-3). However, the County recently received grant funding to create a Historic Context Statement and

conduct a historic resources survey for the Florence-Firestone community and will begin that process shortly.

The commenter's request that no rezoning occur on parcels where buildings of significant importance to the community are located is noted and is included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors.

**From:** Yanel Saenz <yn.saenz@gmail.com>
**Sent:** Friday, November 5, 2021 4:53 PM
**To:** Richard Marshalian <RMarshalian@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; DRP FFTOD <FFTOD@planning.lacounty.gov>
**Subject:** Written Comments for FFTODSP Draft EIR

Hello,

I am submitting written comments for the Florence-Firestone Transit Oriented Development Specific Plan Draft EIR

- 
- 
- Population/Housing
- 
    - 
    - 
    - The Impact Summary and Programmatic Mitigation table states that the “project would not induce substantial
    - unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly...,” it is considered “less that significant impact) and therefore no mitigation measure is recommended. However, members of the community
    - believe this is a highly inaccurate underestimation in the impact this project will have on the infrastructure in this community and displacement/ migration of people. The premise of this project is based on allowing and streamlining transit-oriented development
    - opportunities for affordable housing and commerce.
    - 

R7-1

Thank you,
Yanel Saenz

## R7. Response to Comments from Yanel Saenz, dated November 5, 2021.

R7-1 This comment notes disagreement with the overall conclusion from the Draft EIR that the project would not induce substantial unplanned population growth. Please refer to Master Response IV regarding consideration of population and density within the Draft EIR.

**From:** Martha <mar2ha@yahoo.com>
**Sent:** Friday, November 5, 2021 5:04 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>; Richard Marshalian <RMarshalian@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>
**Subject:** FFTOD Specific Plan and DEIR Comments for Public Record

To the Los Angeles County Department of Regional Planning:

Today November 5, 2021, ends the public review of the FFTOD Draft Specific Plan and the DEIR. I don't need to analyze details in these documents to understand all the harmful effects that the proposed residential zone changes will directly bring to this Florence-Firestone community as a whole.
I reside in the area addressed in the Slauson Station TOD. Every child here is starting from behind by the mere fact that they live in this particular region of Los Angeles County. We're already a marginalized community and by wanting to rezone so aggressively the small streets of 60th, 61st, 62nd, etc., the County of Los Angeles is not willing to make our lives better but is instead intent on making them worse. R8-1
The planners of the Residential Slauson Station Zone either believe they are making necessary changes without the foresight to all the problems that allowing multi-story apartment buildings will cause in these narrow residential streets, or even worse -- they know and they just do not care. The implementation of the RSS Zone would deliberately be putting us in harm's way by bringing increased density to where there's already overcrowding, high crime, pollution, terrible traffic, lack of green spaces, parking issues, a failing school system, thermal inequity, and an overall unsupportive infrastructure.
I would like to point out that we are not fooled into believing that any new housing will be for current Florence-Firestone residents. I don't see why these blocks near the Slauson Station have to bear the heavier brunt of the housing crisis and of the homeless population. Why are we the ones who have to sacrifice our well-being and quality of life? Also, the future displacement of residents due to this rezoning is very real and unfair. R8-2
Anyone who callously comments that these developments take years to happen should look at 61st Street. I already view two very large apartment buildings hovering over my neighbors. This is present day. I now dread knowing what the immediate future will be. R8-3
I'm going to be honest in saying that I've been highly disappointed in the way this FFTOD plan has been presented. While documents have been available online and for a very brief time at our local libraries, nobody can deny that the overwhelming majority of Florence-Firestone residents have no clue about something that's going to affect all of them directly.
With the recent corruption findings against former LA County supervisor Mark Ridley Thomas and former LA Councilman Jose Huizar, I find it very hard to trust local government and its entities to do the right thing. As an example, our Florence Library was one of the very few resources this neighborhood had and it was stripped away. This exposed us to the cruel way that politics works.
This is why I urge you to please take into account our concerns. Please pare down the number of stories and density units in the area indicated under the Residential Slauson Station. R8-4

I will now include the comments I submitted April 14, 2021. While they might seem redundant, they are important:

*The 2020 Census took place last year. As important as it was, I doubt that everyone who lives in the unincorporated Florence-Firestone area took part in making sure that they counted. That's an incredible shame because not only are we numbers, we're people.*

*This community is disadvantaged socially, economically, and, yes, racially. The disparities we face daily are demoralizing, and the re-zoning that's being proposed in the Florence-Firestone Transit-Oriented District Specific Plan will only exacerbate these problems. I'm honestly scared of the trouble that this will create.*

*It's not a position that I take lightly. I'm well-aware of the housing crisis that's currently happening. Becoming homeowners is out of reach for most. Rent prices are so high. The homelessness problem is awful. It's probably very easy to think that planning for the razing of people's homes and the erection of multiple-story, packed-unit buildings will help. However, the cost to the neighborhood will be too great.*

*Florence-Firestone was hit especially hard during the COVID-19 pandemic. All the difficulties that arose because of the social vulnerability that our community suffers from and that also resulted from a lack of space were extremely troubling. It makes one wonder if it's because of the social position of this area's residents that we can't have ordinances like other places where the maximum home or building size cannot be more than a percentage of a total lot's area. The LA County mapping inequality is quite evident.*

*I can see how Florence-Firestone residents are susceptible to being easily displaced, and nobody is going to be watching. Many homeowners will get inundated with unsolicited calls and mail at the least or might fall prey to deceptive and predatory practices from developers at the most. Like they say, people don't play fair where money is involved.*

*The builders aren't going to be concerned that they're contributing to the concrete urban jungle that is Florence-Firestone. There's little greenery in our community as it is. It was disheartening to go into the Los Angeles County Tree Canopy map viewer and to see that the 90001 ZIP Code only has 10.93% tree canopy coverage. It's terrible if you look up how that compares to even other nearby LA neighborhoods.*

*Those developers are not the ones who are going to take a leap of faith and walk to a light-rail station that makes you feel as if you're taking an obstacle course where who knows who or what you're going to come across. I wish I was just being melodramatic, but I'm not exaggerating.*

*Of course, the developers who will buy here won't live here. They're not going to care that many residents already have a hard time finding a place to park. They go to sleep concerned about seeing their car in the same place and condition from when they last parked it.*

*What the investors should buy up are those truly ugly spaces on major streets -- because there are many -- that make people afraid to pass instead of constructing over three-, four-, five- , six-, seven-, eight-story-high buildings within small streets.*

*The status quo in this neighborhood is not good. There are many things that I wish could be changed in Florence-Firestone. I wish I had the opportunity to list all of them. However, one thing that I don't want it to change into is the aggressive residential re-zoning that is proposed on many streets in the FFTD study.*

R8-5

## R8. Response to Comments from Martha, dated November 5, 2021.

R8-1 This comment provides introductory statements, identifies general concerns related to proposed residential zone changes, and in particular identifies the proposed Residential Slauson Station Zone as a primary element of the FFTOD Specific Plan that would be harmful to the commenter's community and would exacerbate a number of existing issues in the area (e.g., density, crime, pollution, parking, traffic, lack of public facilities and infrastructure, etc.). These comments are noted and included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. Please refer to Master Responses I, IV, V, and VI regarding Los Angeles County's intent for the proposed FFTOD Specific Plan, consideration of population and density within the Draft EIR, parking, and the Florence Library, respectively.

Regarding development within the Slauson Station TOD area, this area concept of the Specific Plan focuses on increasing mixed use opportunities that can combine employment, retail, and housing close to the station. Focusing new development potential in this area would take advantage of the public improvements in the area including the Rail to River corridor on the north side of Slauson Avenue and the future West Santa Ana Branch line that will also use the Slauson Station. For this reason, the Specific Plan envisions the highest intensity development occurring within the Slauson Station TOD area to support adjacent land use changes in the City of Los Angeles and to utilize the plan area's largest infill development opportunity sites.

This concept would allow existing industrial and commercial properties near the station to be redeveloped as mixed use at a higher intensity, increase how many homes are allowed in walking distance to Slauson Station, and introducing newer forms of industrial and employment through 'industrial flex' uses in areas where traditional industrial uses currently operate. The Plan will allow a wide range of housing types including duplexes, Accessory Dwelling Units (ADUs), triplexes, fourplexes, courtyard homes, multi-family, and small lot developments in the "More Housing Options" areas. The "TOD Mixed Use / Jobs Area" will extend to Compton Avenue and Holmes Avenue to create a connected TOD area around the station, allowing for a range of service and entertainment uses, and incentivize uses such as childcare and grocery stores, which are prioritized based on community input.

R8-2 Please refer to Master Responses I and III.

R8-3 Los Angeles County is not clear on the full context of this comment. Discussion of timeline for development in public engagement events was to address the amount and expectation for population and housing growth in the area.

R8-4 Please refer to Master Responses I and II regarding Los Angeles County's intent for the proposed FFTOD Specific Plan and its outreach efforts during development of the Specific Plan, respectively.

Regarding notification of the environmental analysis of the FFTOD Specific Plan pursuant to CEQA, on March 15, 2021, Los Angeles County issued a Notice of Preparation (NOP) and Initial Study in accordance with CEQA Guidelines Section 15082 that was sent to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties. The NOP and Initial Study were circulated for 30 days, until April 14, 2021. An online public scoping meeting was held on March 25, 2021, at 5:00 p.m. via Zoom. The intent of the scoping meeting was to solicit written comments regarding the environmental issues that should be evaluated in the Draft EIR. Following completion of the Draft EIR, Los Angeles County submitted the Draft EIR to the State Clearinghouse on September 21, 2021. A Notice of Completion (NOC) was posted at the SCH on September 21, 2021 and a Notice of Availability (NOA) was posted at the Los Angeles County Clerk-Recorder's Office on September 21, 2021. The NOA was sent to interested individuals, federal, state, and local agencies, and posted on the project website at https://planning.lacounty.gov/fftod/Documents. The Draft EIR was released for a 45-day public review period, which commenced on September 21, 2021 and ended on November 5, 2021. Due to the COVID-19 Pandemic and closure of Los Angeles County facilities, the document was made available for review on Los Angeles County's website in electronic format and was available for download.

R8-5 Thank you for your comments; Los Angeles County received the referenced comments in an email (including attachment for the Community Feedback Worksheets) as part of the Specific Plan outreach process, and these comments are noted and included in the Final EIR for the decision-makers' consideration as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. Please also refer to the responses to your comments above.

-

**From:** Yanel Saenz <yn.saenz@gmail.com>
**Sent:** Friday, November 5, 2021 4:43 PM
**To:** Richard Marshalian <RMarshalian@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; DRP FFTOD <FFTOD@planning.lacounty.gov>
**Subject:** Written Comments for FFTODSP

Hello,

I am submitting written comments for the Florence-Firestone Transit Oriented Development Specific Plan.

- 
- 
- Limit zoning changes to stay within the 0.5 mile TOD radius and not extend outside
- 
    - 
    - 
    - The FFTODSP proposes zoning changes that will affect the areas within a 0.5 mile radius of transit stations;
    - therefore, the zoning changes ("More Housing Options" and "TOD Mixed Use / Job Areas") should be limited to happening within the 0.5 mile radius as mentioned in the plan and not extend outside of that radius, as seen on this map (Draft map on page [3-4]).
    - As previously pointed out, change in zoning has the potential of accelerating gentrification. It was mentioned that the reason there was zoning outside of the 0.5 mile radius was to decrease the effect of "spot zoning," but I don't think this is a valid argument.
    - The zoning should stay within the 0.5 mile radius as is the purpose of this study
    - 

R9-1

- 
- 
- The Florence TOD area should have the same consideration as the Firestone TOD with regards to the lower overall
- change in land use and zoning and being considered vulnerable to displacement
- 
    - 
    - 
    - They classified Firestone as more vulnerable to displacement using the maps in the Mobility and Equity Study
    - such as number of households with cost burden >30% and >50%, which show that the burden is higher in the Firestone TOD Area and lower in the Florence TOD area. However, there is another map that still shows that in the Florence TOD area, the number of renter
    - households are still high - 60%, 69%, 70% and 55%, which are comparable to the Firestone TOD area. The high number of renters in the Florence TOD area means they will be vulnerable to displacement once there are sweeping zoning changes made that will motivate

R9-2

- landlords and developers to build in the TOD area. If the only reason to upzone in the Florence TOD area is because it is our “downtown” and a hub, I don’t think that’s a good enough reason to. Both the Florence and Firestone area are vulnerable to displacement.
- Florence-Firestone as a whole is vulnerable. The upzoning of the Florence TOD area will cause developers to swoop in to buy up property to redevelop into duplexes/triplexes/etc and increase rent, ultimately pushing residents out. Lucrative offers for homes
- may be made that are hard to pass up, but that ultimately are ripping residents off. Additionally, homeowners may not have the money/resources to rebuild their property to include more units, developers would be the ones mostly benefiting from this zoning
- change.
-

R9-2 Cont'd

Best,
Yanel Saenz

## R9. Response to Comments from Yanel Saenz, dated November 5, 2021.

R9-1 The commenter requests zoning to be limited to within 0.5 mile of existing Metro A (Blue) Line Stations (i.e., the 0.5-mile TOD radius) only and not to allow zoning changes outside of the radius, which the commenter states will limit acceleration of gentrification. The majority of the proposed zone changes are within the three TOD radii; areas outside of a TOD radius were included for zoning consistency and to avoid (to the extent reasonable) change of zoning mid-block or mid-parcel. The comment is noted and is included in the Final EIR for the decision-makers' considerations as part of deliberations before the Los Angeles County Regional Planning Commission and Board of Supervisors. It should be noted that the Draft EIR does consider an alternative that limited all land use and zoning changes to within the 0.5-mile TOD radius of the Slauson Station (see Alternative 3: Slauson TOD Focused); refer to Section 4.0 Alternatives, of the Draft EIR.

As noted, areas outside of a TOD radius were primarily included for zoning consistency and to avoid (to the extent reasonable) change of zoning mid-block or mid-parcel which could be construed as 'spot zoning'. The largest area proposed for rezoning outside a TOD radius is the residential neighborhood at the north west corner of Florence-Firestone bounded by Hooper Avenue to the east, 58th Drive on the north, S Central Avenue to the west, and 61st Street to the south. This area was included in the rezoning as it is current the same zoning as the neighborhood east of Hooper Avenue, therefore it was included for consistency purposed and to create a better transition from the commercial properties along S Central Avenue and Slauson Avenue.

Please also refer to Master Response I regarding Los Angeles County's intent for the proposed FFTOD Specific Plan.

R9-2 The Equity & Mobility Study's socioeconomic analysis determined that residents in the Firestone Station TOD area (specifically the neighborhood south of Nadeau) were found to be at the highest risk of displacement if rents increase and/or large-scale redevelopment occurs. While additional specific protection to preserve the stability of these residential neighborhoods (while still adding much-needed housing options) was included as part of the concept for the Firestone TOD area, it was recognized that the Firestone Station TOD area was not the only location within the FFTOD Specific Plan with displacement vulnerabilities. Equity recommendations derived from the Equity & Mobility Study helped to frame and refine the community outreach approach and Specific Plan standards. Equity recommendations included:

- Ensure current tenant, homeowner, and workforce protections are being used to their full potential and pursue additional policies to expand access to critical resources and infrastructure
- Establish and reinforce long-term planning partnerships with community organizations
- Align TOD land uses and densities with tailored needs for residents and businesses who may be most vulnerable to displacement
- Identify robust affordability policies and funding mechanisms that allow new development to successfully serve existing residents and businesses (due to the area's high overall housing cost burden)

Proposed zoning changes within the Florence Station TOD area are not just as a downtown/hub; the project is a specific plan to establish transit-oriented development policy direction, development standards, and implementation programs with specific focus on all three LA Metro transit stations within the Florence-Firestone Community.

The Florence Station TOD area concept focuses on supporting and increasing neighborhood services, employment, and more homes near the Florence Station. The concept envisions a variety of uses and housing options similar to those around Slauson Station, however the allowed heights and the number of homes per acre are lower to harmonize the scale of infill development with existing neighborhoods surrounding Florence Station. As a centrally located corridor with "main street"-style buildings and a vibrant variety of small businesses, cultural landmarks and public art, Florence Avenue serves as the heart of the Florence-Firestone community. The concept intends to reinforce and enhance the "Florence Mile" as an active mixed-use corridor and central destination with a wealth of small retail and dining businesses, neighborhood services, and housing options. The plan will allow a wide range of housing types including duplexes, ADUs, triplexes, fourplexes, courtyard homes, multi-family, and small lot developments in the "More Housing Options" areas. Medium-density mixed-use development opportunities – including the prioritized childcare and grocery stores uses - will be introduced near the transit station along Florence Avenue, Compton Avenue, Nadeau Street, and the Metro A Line (Blue) south of Florence Avenue in the "TOD Mixed Use / Jobs" areas.

# 3.0 REVISIONS TO THE DRAFT EIR

## 3.1 INTRODUCTION

This section contains revisions to the Draft EIR based upon additional or revised information required to prepare a response to a specific comment. It includes revisions to programmatic mitigation measures to fully respond to commenter concerns regarding providing additional clarification to mitigation requirements included in the Draft EIR. The revisions to the programmatic mitigation measures do not alter any impact significance conclusions as disclosed in the Draft EIR. Changes made to the Draft EIR are identified here in ~~strikeout text~~ to indicate deletions and in <u>underlined text</u> to signify additions.

## 3.2 DRAFT EIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the Draft EIR.

Page 3.2-14, Section 3.2, Air Quality (Regulatory Setting Subsection 3.2.2.2, Local). The following addition is made in response to Comment A1-2 from the South Coast Air Quality Management District. Added text is <u>underlined</u>.

**<u>Southeast Los Angeles Community Emissions Reduction Plan (CERP)</u>**

<u>On December 4, 2020, the SCAQMD Governing Board adopted the Assembly Bill (AB) 617 Southeast Los Angeles Community CERP. The CERP outlines goals and actions by the Community Steering Committee (CSC), the SCAQMD, and the CARB to reduce air pollution in the Southeast Los Angeles community. An essential piece of the program is partnership and collaboration with the community to addresses the community's air quality priorities in the CERP. Based on the sources of air pollution impacting the community, the Southeast Los Angeles CSC identified the following air quality priorities to be addressed by this plan: truck traffic and freeways; railyards; rendering facilities; metal processing facilities; green space; and general industrial facilities. The CERP includes actions, such as developing and enforcing regulations, providing incentives to accelerate the adoption of cleaner technologies, and conducting outreach to provide useful information to support the public in making informed choices.</u>

Page 3.2-31 and 3.2-32, Section 3.2, Air Quality (Subsection 3.2.5, Programmatic Mitigation Measures). The following additions are made in response to Comment A1-2 from the South Coast Air Quality Management District. Added text is underlined.

**MM AQ-4** For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**MM AQ-6** For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that

sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses. Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed. Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts, which may include, but not necessarily be limited to:

- Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;
- Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;
- Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing "No Idling" signs;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;
- Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Evaluate the potential to electrify a portion of entirety of an on-site user owned and operated truck fleet;
- Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;

- Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;
- Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;
- Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Rerouting construction trucks away from congested streets or sensitive receptor areas;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;
- Establishing an electrical supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible;
- Using haul trucks with on-road engines instead of off-road engines
- Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;
- Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and

- Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site.

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Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Slauson Station TOC Specific Plan, aka Florence-Firestone TOD Specific Plan

# **Programmatic Environmental Impact Report**

Public Review Draft
September 2021

Prepared for:

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# EXECUTIVE SUMMARY

## ES.1 INTRODUCTION

This Executive Summary provides a brief summary of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Project Draft Environmental Impact Report (EIR). This summary outlines the project location, description, and objectives; the proposed alternatives to the proposed Specific Plan; and areas of controversy. This summary also provides a summary table of all potential impacts and mitigation measures identified in this EIR.

## ES.2 PROJECT LOCATION

The proposed FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

## ES.3 PROJECT DESCRIPTION

The FFTOD Specific Plan would establish transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5-mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit-oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

## ES.3.1 Proposed General Plan Land Use Amendments

The project includes General Plan Land Use amendments to approximately 953.06 acres of land in the FFTOD Specific Plan Area to provide consistency with the General Plan policy direction. The updated land use designations are supported by development of new zones for the FFTOD Specific Plan to support transit oriented investment. Areas outside of the transit oriented development areas are considered stability areas. Targeted changes in the stability areas are generally limited to addressing Housing Element Update RHNA needs, creating cohesive blocks that connect to the transit oriented development areas or reconciling designations with adjacent jurisdiction plans. The expected buildouts under the FFTOD Specific Plan based on the land use designation updates and zoning strategy are provided in Table ES-1.

**Table ES-1: Specific Plan Land Use Summary**

| Land Use Designation | Zone | Acres | Percent of Plan Area | Net New Estimated Buildout Potential | |
|---|---|---|---|---|---|
| | | | | Residential (Units) | Nonresidential (SF) |
| **TOD and RHNA Areas** | | **953.06** | | **12,110** | **1,183,013** |
| Mixed Use (MU) | MU Transit (MU-T) | 38.34 | 2.21% | 1,585 | 173,799.87 |
| | MU 3 (MU-3) | 27.07 | 1.56% | 1,002 | 131,159.28 |

| Land Use Designation | Zone | Acres | Percent of Plan Area | Net New Estimated Buildout Potential | |
|---|---|---|---|---|---|
| | | | | Residential (Units) | Nonresidential (SF) |
| | MU 2 (MU-2) | 39.80 | 2.30% | 978 | 107,142.02 |
| | MU Development (MXD) | 75.83 | 4.37% | 7,229 | 673,980.70 |
| Major Commercial (CM) | MU 1 (MU-1) | 53.71 | 3.10% | 652 | 94,951.88 |
| Residential 100 (H100) | Residential Slauson Station (RSS) | 24.44 | 1.41% | 301 | - |
| Residential 50 (H150) | Residential Medium (RM) | 69.51 | 4.01% | 61 | - |
| Residential 30 (H30) | Residential Low-Medium 2 (RLM-2) | 275.09 | 15.87% | 158 | - |
| Residential 18 (H18) | Residential Low-Medium 1 (RLM-1) | 303.25 | 17.50% | 144 | 1,979.05 |
| Light Industrial (IL) | Industrial Mix (IX) | 46.01 | 2.65% | - | - |
| **Stability Areas** | | **780.12** | | **0** | **0** |
| Residential 9 (H9) | Single-Family Residence (R-1) | 23.06 | 1.33% | - | - |
| Residential 18 (H18) | Two-Family Residence (R-2) | 182.88 | 10.55% | - | - |
| | Limited Density Multiple Residence (R-3) | 194.64 | 11.23% | - | - |
| Residential 9 (H9) | Medium Density Multiple Residence (R-4) | 0.43 | 0.02% | - | - |
| Residential 18 (H18) | Light Agricultural (A-1) | 0.28 | 0.02% | - | - |
| General Commercial (CG) | Neighborhood Business (C-2) | 4.58 | 0.26% | - | - |
| | General Commercial (C-3) | 33.71 | 1.95% | - | - |
| | Commercial Manufacturing (C-M) | 7.93 | 0.46% | - | - |
| Public and Semi-Public (P) | Institutional (IT) | 85.49 | 4.93% | - | - |
| Light Industrial (IL) | Light Manufacturing (M-1) | 33.15 | 1.91% | - | - |
| Heavy Industrial (IH) | Heavy Manufacturing (M-2) | 115.15 | 6.64% | - | - |
| Park and Recreation OS-PR | Open Space (OS) | 98.82 | 5.70% | - | - |
| | **Total** | **1733.19** | **100%** | **12,110** | **1,183,013** |

Notes: RHNA = Regional Housing Needs Assessment
Estimated buildout is based on an assigned buildout factor that reflects market research, market trends, and the potential development opportunity presented by the proposed zoning changes.
The buildout factor represents a range of magnitude of reasonably expected development to occur through the year 2035.
Each of the proposed zones that allow residential units was then assigned an "Assumed Average Density" of dwelling units per acre (du/ac) to help characterize the kind of development likely to occur.
Estimated nonresidential development is based on square feet needed to meet the demand of the population living in the new residential units.

## ES.3.2 Proposed Specific Plan Zoning

The FFTOD Specific Plan proposes to rezone parcels in the FFTOD Specific Plan Area to encourage transit-oriented development in the area. This would support development within

walking distance of the LA Metro stations (Slauson, Florence, and Firestone stations), and would be a combination of mixed-use, residential, and industrial mix uses. The FFTOD Specific Plan would allow existing development and uses within the FFTOD Specific Plan Area to continue until new development is proposed. The FFTOD Specific Plan would require all new land use and development within the FFTOD Specific Plan Area to conform to the FFTOD Specific Plan zoning designations described below.

#### ES.3.2.1 Mixed Use Zones

The general purpose of the Mixed Use (MU) Zones in the FFTOD Specific Plan Area are intended to provide support for transit oriented development with employment, homes, and services near transit stations. The MU Zone development standards would include a 3.0 maximum floor area ratio; a maximum density ranging from 50 dwelling units per acre (du/ac) to 150 du/ac; a maximum building height ranging from 50 feet to 72 feet; and a minimum building setback of 2 feet for most street frontages (note: Florence Avenue has no minimum building setback.).

#### ES.3.2.2 Residential Zone

The general purpose of the Residential Zones in the FFTOD Specific Plan Area are intended to support a variety of housing options, types, configurations, and affordability levels in proximity to transit. The residential zone development standards would include a maximum density ranging from 18 du/ac to 100 du/ac; a maximum building height ranging from 36 feet to 65 feet, and a minimum building setback of 5 feet for most street frontages (note: Florence Avenue has a minimum building setback of 3 feet).

#### ES.3.2.3 Industrial Mix Zone

The general purpose of the Industrial Mix (IX) Zone is intended to support a transition to less intensive employment-focused uses near transit oriented development and improve land use adjacencies to residential areas. The IX Zone is intended to maintain neighborhood-appropriate light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for mixed residential and employment areas. The IX Zone allows the creation of transition areas between employment uses and residential areas to encourage less noxious uses (such as commercial) to abut homes, thereby supporting the goals of the Los Angeles County Green Zones Program and Ordinance. The zone allows uses focused on light industrial, neighborhood-serving commercial and office. The IX Zone would encourage a cleaner environment through lower-emission and lower intensity uses where industrial businesses and residents can coexist. The IX Zone development standards would include a 1.0 maximum floor area ratio; minimum lot size of 4,000 square feet (no maximum lot coverage); a maximum building height of 36 feet, and a minimum building setback of 2 feet for most street frontages.

### ES.3.3 Supplemental Development Standards

In addition to the allowed uses and development standards of the base zones, the FFTOD Specific Plan provides general development standards related to density, intensity, height regulations, setbacks, and stepbacks to promote urban design and form that supports transit oriented development and creates transitions between neighborhood types. The FFTOD Specific Plan also includes active ground floor design standards for mixed use corridors in the FFTOD Specific Plan

Area to support a walkable, pedestrian character that promotes walking within the community. These streetscape improvements also provide for shading, outdoor dining and activities, public art, pedestrian and exterior lighting, fencing, and architectural and landscaping requirements including street trees.

To address the community's feedback to increase publicly accessible open space, the FFTOD Specific Plan also proposes open space standards for all residential and mixed use developments. Each residential or mixed use development is required to provide the minimum area of common and private open space based on type within each development as well as publicly accessible open spaces and signage. Projects over 80,000 gross square feet are required to provide publicly accessible open space as a percentage of the total development.

## ES.3.4 Base Zone Modifications

Los Angeles County will also rescind the existing Florence-Firestone Community Standards District zoning overlay currently within the Los Angeles County Zoning Code and incorporate any applicable standards into the FFTOD Specific Plan. These existing standards would continue to help improve the appearance of the community, promote the maintenance and reuse of structures and properties, and implement the goals and policies of the FFCP in a manner that protects the health, safety, and general welfare of the community. The standards would also help to improve the compatibility between residential and neighboring industrial uses, encourage pedestrian activity, and encourage business growth near transit.

## ES.3.5 Buildout of the Proposed Specific Plan

The FFTOD Specific Plan would provide transit-oriented development opportunities for infill and redevelopment to serve as catalyst to revitalize the area. The buildout of the FFTOD Specific Plan Area would result in a net increase of approximately 42,518 additional people associated with 12,110 new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area.

## ES.3.6 Proposed Mobility Improvements

The FFTOD Specific Plan would provide recommendations for mobility infrastructure improvements to support transit, pedestrian, and bicycle mobility, as well as programmatic improvements to support complete streets and improve parking conditions. Additionally, the FFTOD Specific Plan proposes three major improvements to improve access to the Metro A Line Stations in the FFTOD Specific Plan Area and to Roosevelt Park, with a focus on pedestrian accessibility.

- **Southern Slauson Station Access Point.** Formalizing the informal pedestrian pathway leading from 60th Street to Slauson Avenue would connect the neighborhoods south of the Slauson Station to the station entrance.
- **Pedestrian Bridge at 76th Street.** Replacement and reconstruction of the pedestrian bridge connecting the western side of the community at East 76th Street to Roosevelt Park at Graham Avenue would improve neighborhood pedestrian connectivity, access to community assets, and access to transit.

- **Florence Station and Firestone Station Access**. Increasing the ease of reaching a transit station is an important improvement that should be made for each of the stations in the FFTOD Specific Plan Area. The LA Metro A (Blue) Line Stations in the FFTOD Specific Plan Area each only have one access point. The Slauson Station will see expanded access as the West Santa Ana Branch line is implemented (under a separate project), but the Florence and Firestone stations would also benefit from improved access. At the Florence Station, the community suggested creation of a second at-grade access point at the southern end of the station to minimize out-of-direction travel to access the platform. At the Firestone Station, additional amenities under the elevated rail line would improve the pedestrian and transit rider experience.

## ES.3.7 Proposed Infrastructure Improvements

### ES.3.7.1 Water

The FFTOD Specific Plan proposes improvements to the existing water system to accommodate buildout. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under buildout of the FFTOD Specific Plan. However, increases in residential density would result in increased potential water usage including potable water and fire prevention demand. To service this, the following needs have been identified if increased density develop at the following locations:

- All lines servicing fire hydrants must be at least a nominal 6 inches to supply minimum fire flow requirements per Los Angeles County Municipal Code Section 20.16.060
- High-density residential buildout (RSS Zone) of five stories north of 62nd Street and 63rd Street west of Holmes Avenue may require upgrade of the existing 4-inch cast iron. Recommended replacing 4-inch main with 10-inch polyvinyl chloride (PVC) main along 62nd and 8-inch PVC main along 63rd.
- Medium-density residential buildout (RM Zone) east of Converse Avenue, south of 68th Street, west of Wilmington Avenue, and north of Florence Avenue may require upgrade of 4-inch cast iron along 69th Street, 70th Street, and 71st Street. Recommend replacing all 4-inch mains in this area with 8-inch PVC mains.

### ES.3.7.2 Sewer Service

The FFTOD Specific Plan proposes improvements to the existing sewer system to accommodate buildout. Existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition with the following exceptions which may require upgrading based on the level of density/intensity realized in the vicinity.

- **Tributary Area 5**: A 10-inch main emptying into a trunk line at the Maie Avenue/Nadeau Street intersection may warrant further study. The main collects from 50 acres of light residential and light manufacturing on the east side of Converse Avenue and Maie Avenue, from north of E 60th Street to Nadeau Avenue. Depending on density/intensity realized in the geography between 60th Street and Nadeau Avenue, east of Converse Avenue and Maie Avenue, the main may need to be upgraded to 15 inches.
- **Tributary Area 6**: An 8-inch main running toward the city of Huntington to the east at Slauson Avenue may warrant further study. The main collects from 49 acres of Unlimited

Residence and Heavy Manufacturing along Holmes Avenue from Gage Street to Slauson Avenue; then east to west from South Pacific railroad lines to Wilmington Avenue. It comprises the northeast corner of the FFTOD Specific Plan Area and a majority of the Slauson TOD Area. This portion of the FFTOD Specific Plan is planned for high-intensity mixed use and medium-density residential development replacing existing industrial and primarily single-family uses, respectively. The 8-inch main may be insufficient for current conditions due to the significant presence of heavy manufacturing in the area; upgrade to 10 inches is recommended. Depending on density/intensity realized from future development, the main may need to be upgraded to 15 inches.

- **Tributary Area 7**: A 10-inch main flowing south under Holmes Avenue from Gage Avenue to a Trunk line at Florence Avenue may warrant further study. The main runs between South Pacific railroad to the east and Wilmington Avenue to the west. The 10-inch main services 59 acres of mostly Unlimited Residence with some Light Manufacturing, Neighborhood Business, and Mixed-Use Development; this area is planned for low-medium (RLM-2) to medium density (RM) residential. Depending on density/intensity realized in the geography, the main may need to be upgraded to 15 inches.
- **Tributary Area 9**: An 8-inch main under Parmelee Avenue that flows to the west under E 78th Street and empties into a trunk under Hooper Avenue may warrant further study. The main services about 34 acres south of Florence Avenue, east of Parmelee Avenue and North of E 78th Street; this area is composed of Limited Density Multiple Residence, General Commerce, and Mixed-Use Development. Depending on density/intensity realized in the geography, the main may need to be upgraded to 10 inches.

### ES.3.7.3 Stormwater Service

Buildout of the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system because the area is completely developed and projects would be required to incorporate low-impact development practices per the Regional Water Quality Control Board requirements and Los Angeles County Public Works Green Infrastructure Guidelines. However, based on existing infrastructure in the FFTOD Specific Plan Area, the FFTOD Specific Plan proposes that the areas served by the Glen Avenue Drain improve area runoff peak flow characteristics through generalized implementation of retention-based stormwater quality control measures within the public right-of-way and in any new developments. The FFTOD Specific Plan includes a potential for upsizing segments of the underground system to handle 50 percent greater flow.

## ES.4 PROJECT OBJECTIVES

The project objectives are to:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

The FFTOD Specific Plan objectives were identified by the TOD Program and the Florence-Firestone Community Plan in collaboration with Caltrans.

# ES.5 ALTERNATIVES

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this Draft EIR contains a comparative impact assessment of alternatives to the project. The primary purpose of this section is to provide decision makers and the public with a reasonable range of feasible project alternatives that could attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project.

CEQA Guidelines Section 15126.6 states:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Analysis of three alternatives to the project is guided by the following considerations set forth under CEQA Guidelines Section 15126.6:

- An EIR need not consider every conceivable alternative to a project
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process
- Reasons for rejecting alternative include:
- Failure to meet most of the basic project objectives
- Infeasibility
- Inability to avoid significant effects

Alternatives to a project must be considered even if they would impede—to some degree—the attainment of project objectives or be more costly (CEQA Guidelines Section 15126.6[b]). However, the range of alternatives addressed in an EIR need not be exhaustive, and is governed by a "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR must examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project.

A brief description of the alternatives evaluated in this EIR is provided below. These alternatives include a no project alternative which is required by CEQA Guidelines Section 15126.6(e). This no project alternative is Alternative 1, No Project/Development in Accordance with Existing Zoning. Two additional alternatives, Alternative 2, Firestone TOD Modified Land Use and Alternative 3, Slauson TOD Focused are also evaluated and compared to the proposed project.

## ES.5.1 Alternative 1: No Project/Development in Accordance with Existing Zoning

This alternative would result in limited additional development of the commercial and mixed use corridors under existing zoning per the Florence-Firestone Community Plan (FFCP), Los Angeles

County Municipal Code, and Florence-Firestone Community Standards District. Capacity for mixed use residential and nonresidential would not be introduced along Slauson Avenue, Compton Avenue, Gage Avenue, Central Avenue, Nadeau Street, or Firestone Boulevard. The residentially zoned areas in the Florence-Firestone community are largely built out and would likely be limited in any additional development.

Under this alternative Los Angeles County would implement the General Plan land use designations established by the FFCP. Buildout of Alternative 1 is represented by the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy 2016-2014 Model for the FFTOD Specific Plan Area, interpolated to the horizon year (2035) of the proposed Specific Plan. Therefore, the expected limited development in accordance with existing zoning would be approximately 14,911 additional residential units and 2,061,510 additional square feet of nonresidential uses. In comparison to the proposed FFTOD Specific Plan, this alternative would result in fewer residential units (10,621 housing units) and more nonresidential uses (563,757 square feet).

## ES.5.2 Alternative 2: Firestone TOD Modified Land Use

Development under this alternative would result in expanded implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street. The proposed FFTOD Specific Plan zones this area as RLM-1 limiting maximum density to 18 dwelling units per acre (du/ac) to support community stability and maintain property ownership/existing residents in the area. The proposed FFTOD Specific Plan zoning is expected to result in 25,532 potential net new residential units by 2035 generated primarily through addition of ADUs and conversion of existing single-family homes to duplexes. Under this alternative, RLM-1 zoning would be converted to RLM-2 and RM zoning allowing 20 to 30 du/ac and 20-50 du/ac, respectively. This alternative would include all other land uses under the proposed FFTOD Specific Plan. Therefore, development under this alternative would result in net increases of up to 25,596 residential units by 2035 within the FFTOD Specific Plan Area (64 units more than the proposed project) and 1,546,348 square feet of nonresidential uses. Increased zoning under this alternative would be expected to increase displacement of property owners and existing residents based on a higher likelihood for lot consolidation, increased property values, and increased rents. In comparison to the proposed FFTOD Specific Plan, this alternative would result in an additional 64 residential units and 48,595 non-residential square feet. The purpose of this alternative is to present other configurations considered, despite greater potential impacts, for the purpose of additional information for the public and decision makers.

## ES.5.3 Alternative 3: Slauson TOD Focused

Development under this alternative would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. The MU-T, MXD, IF, RSS, RM, and RLM-2 zones in the Slauson Station TOD as identified by the proposed FFTOD Specific Plan would be implemented. All parcels identified as Housing Element Update RHNA Parcels, predominantly rezoning to MXD would also be implemented throughout the FFTOD Specific Plan Area. All land uses and zones outside the 0.5-mile TOD radius from the Slauson Station and identified RHNA parcels would remain consistent with existing General Plan land use designations, the FFCP, and existing zoning of the

Los Angeles County Municipal Code and Florence-Firestone Community Standards District. Other corridors zoned non-residential or mixed use would realize limited additional development consistent with the existing zoning consistent with the expectations identified in the No Project/Development in Accordance with Existing Zoning Alternative.

Therefore, development under this alternative would result in development of up to 22,848 residential units and 1,169,894 nonresidential square feet in the FFTOD Specific Plan Area by 2035. In comparison to the proposed FFTOD Specific Plan, this alternative would result in 2,684 fewer residential units and decrease nonresidential uses by 327,859 square feet.

**Table ES-1: FFTOD Specific Plan Area Future Condition (2035)**

| | Units (Households) | Population | Population / Household | Nonresidential Square Feet | Total Employment |
|---|---|---|---|---|---|
| **Proposed Project** | 25,532 | 100,423 | 3.9 | 1,497,753 | 11,408 |
| **Alternative 1: No Project/Development in Accordance with Existing Zoning** | 14,911 | 66,072 | 4.4 | 2,061,510 | 9,591 |
| **Alternative 2: Firestone TOD Modified Land Use** | 25,596 | 101,308 | 4.0 | 1,546,348 | 11,520 |
| **Alternative 3: Slauson TOD Focused** | 22,848 | 91,253 | 4.0 | 1,169,894 | 10,651 |

# ES.6 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the Draft EIR, the Notice of Preparation (NOP) was distributed for comment from March 15, 2021 through April 14, 2021. An online public scoping meeting was held on March 25, 2021 via Zoom. A summary of the NOP comment letters received during the public review period and comments received from the public scoping meeting are summarized in Tables 1-1 and 1-2, respectively, in Chapter 1.0, Introduction.

# ES.7 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

## ES.7.1 Existing Regulations, Requirements, and Procedures for Future Development Projects

This EIR is a program EIR prepared in accordance with CEQA Guidelines Section 15168. Although the legally required contents of a program EIR are the same as for a project EIR, program EIRs are typically more conceptual than project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives

and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, later activities in the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, many later activities may be within the program EIR's scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a lead agency relies on a program EIR for a later activity, it must incorporate feasible mitigation measures and alternatives from the program EIR into the later activities (Guidelines Section 15168[c][3]). If a later activity would have effects outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis.

The mitigation measures described in this document are for a program-level decision (referred to as "programmatic mitigation measures") and are intended to be used to avoid, minimize, or reduce potentially significant environmental impacts of future development projects pursuant to implementation of the FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from this EIR. As part of these second-tier environmental reviews, the individual project applicants, in coordination with Los Angeles County, will use the programmatic mitigation measures identified in this program document as starting points to determine their applicability to a specific project and to develop additional or more specific mitigation measures (as necessary) for significant adverse impacts identified in the project-specific analysis associated with their specific location and type of action. The CEQA monitoring process includes review, guidance, and reporting components. For second tier documents individual project applicants, in coordination with Los Angeles County, will note which applicable programmatic mitigation measures are being adopted and used and explain why others are not. Individual project applicants will, in coordination with Los Angeles County, provide a schedule for implementing the adopted mitigation measures and for reviewing the implementation of those measures.

It should be noted that standard existing regulations, requirements, and procedures applicable to the project are considered a part of the existing regulatory environment and are not considered or included in mitigation. Table ES-2 lists key existing regulations, requirements, and procedures for future development projects pursuant to implementation of the FFTOD Specific Plan (refer to the individual environmental category analyses in Sections 3.1 through 3.16 for a complete discussion of regulations, requirements, and procedures applicable to the project).

**Table ES-2: Standard Existing Regulations, Requirements, and Procedures for Future Development Projects Pursuant to Implementation of the FFTOD Specific Plan**

| Key Standard Existing Regulations, Requirements, and Procedures |
|---|
| • Adherence to the FFTOD Specific Plan Standards<br>• Los Angeles County Code<br>• California Building Energy Efficiency Standards<br>• Policy EJ-2.4, Green Building Techniques<br>• Hold current certificates of compliance for ARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]<br>• Los Angeles County's Construction & Demolition (C&D) Debris Recycling and Reuse Ordinance, Chapter 20.87 of the Los Angeles County Code<br>• Los Angeles County's Green Building Ordinance<br>• California Code of Regulations Title 20 and Title 24 (California Building Standards Code, including CALGreen)<br>• Construction General Permit and MS4 Permit<br>• California Building Code and Los Angeles County Building Code<br>• Low Impact Development Standards<br>• U.S. Department of Transportation regulations listed in 49 CFR, Hazardous Materials Transportation Act<br>• California Department of Transportation standards<br>• California Vehicle Code (Title 13 of the California Code of Regulations); and Cal/ Occupational Safety and Health Administration standards.<br>• Subtitle C of the Resource Conservation and Recovery Act (40 CFR Part 263)<br>• Los Angeles County Public Works Green Infrastructure Guidelines<br>• Section 12.08.440 of the Los Angeles County Code<br>• Design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits<br>• Required law enforcement mitigation fees<br>• Construction Traffic Management Plan and Construction Mitigation Plan<br>• Senate Bill 50 school impact fees to the Los Angeles Unified School District<br>• One-time Library Facilities Mitigation Fee from developers<br>• Quimby Fees<br>• Site Access Studies |

Notes:
CFR = Code of Federal Regulations

## ES.7.2 Impact Summary and Mitigation

The potential environmental impacts of the project are summarized in Table ES-3 below. This table lists impacts and a summary of the programmatic mitigation measure(s) and an indication of whether the impact would be mitigated to less than significant. The level of significance after mitigation is provided in three major categories: significant impacts that would remain significant even with mitigation (significant and unavoidable impacts), significant impacts that could be mitigated to a level of less than significant, and impacts that would not be significant.

**Table ES-3: Impact Summary and Programmatic Mitigation**

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| **Aesthetics** | | |
| **AES-1:** The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality. | No programmatic mitigation measures are required. | Less than significant impact |
| **AES-2:** The project would not create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area. | No programmatic mitigation measures are required. | Less than significant impact |
| **Air Quality** | | |
| **AQ-1:** The project would conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD). | **MM AQ-1**: Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the U.S. Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.<br>Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable. | Significant and unavoidable impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| | Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.<br>**MM AQ-2:** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under SCAQMD Rule 403 to reduce PM10 and PM2.5 emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.<br>• Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering.<br>• During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, PM10-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.<br>• During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection.<br>• During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day.<br>• During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.<br>**MM AQ-3:** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low VOC paints. Super-compliant low VOC paints shall be no more than 10 g/L of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings.<br>**MM-AQ-7:** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit. | |
| **AQ-2:** The project would result in a cumulatively considerable net increase of criteria pollutants (VOC, NOx, PM10, and PM 2.5) for which the project region is | Implementation of Programmatic Mitigation Measures AQ-1 through AQ-3 and AQ-7 is required. | Significant and unavoidable impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| nonattainment (O3) under an applicable federal or state ambient air quality standard. | | |
| **AQ-3:** The project would expose sensitive receptors to substantial pollutant concentrations. | Implementation of Programmatic Mitigation Measures AQ-1 through AQ-3 and AQ-7 is required.<br><br>**MM AQ-4:** For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:<br>• installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions<br>• using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied)<br>• establishing staging areas for the construction equipment that are as far as possible from sensitive receptors<br>• communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes<br>• planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses<br>• use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy<br>• incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers)<br>**MM AQ-5:** When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future.<br><br>**MM AQ-6:** For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| | activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.<br><br>Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.<br><br>Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:<br><br>• locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open<br>• providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations<br>• requiring the TAC-generating activity (e.g., loading docks) be located away from sensitive receptors<br>• incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers)<br>• develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits<br>• require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock<br>• use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy<br>• evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet<br>• evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips | |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| | • provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure<br>• ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities<br>• use vegetated buffers between substantial TAC-generating source locations and sensitive receptors<br>If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:<br>• installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions<br>• using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied)<br>• establishing staging areas for the construction equipment that are as far as possible from sensitive receptors<br>• rerouting construction trucks away from congested streets or sensitive receptor areas<br>• communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes<br>• documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation<br>• establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible<br>• using haul trucks with on-road engines instead of off-road engines<br>• equipping nearby buildings with High Efficiency Particle Arresting (HEPA)filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings<br>• planning construction phasing so that future construction activities continue to move further away from occupied land uses<br>• planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site | |
| **AQ-4:** The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. | No programmatic mitigation measures are required. | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| **Cultural Resources** | | |
| **CUL-1:** The project may potentially cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. | **MM CUL-1:** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.<br><br>The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.<br><br>While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress. | Significant and unavoidable impact |
| **CUL-2:** The project may cause a substantial adverse change in the significance of an | **MM CUL-2:** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| archaeological resource pursuant to CEQA Guidelines Section 15064.5. | result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.<br><br>Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with Los Angeles County, and local Native American representatives expressing interest.<br><br>During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing | |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| | interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. | |
| **CUL-3:** The project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. | **MM CUL-3:** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.<br><br>If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.<br><br>Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.<br><br>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| | program shall include a written repository agreement prior to the initiation of mitigation activities.<br><br>A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place. | |
| **CUL-4:** The project would not disturb any human remains, including those interred outside of formal cemeteries. | No programmatic mitigation measures are required. | Less than significant impact |
| **Energy** | | |
| **ENE-1:** The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. | No programmatic mitigation measures are required. | Less than significant impact |
| **ENE-2:** The project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. | No programmatic mitigation measures are required. | Less than significant impact |
| **Geology and Soils** | | |
| **GEO-1:** The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: seismic-related ground failure, including liquefaction. | No programmatic mitigation measures are required. | Less than significant impact |
| **GEO-2:** The project would not result in substantial soil erosion or the loss of topsoil. | No programmatic mitigation measures are required. | Less than significant impact |
| **GEO-3:** The project would not be situated on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | No programmatic mitigation measures are required. | Less than significant impact |
| **GEO-4:** The project would not be situated on expansive soil, as defined in Table 18-1-B of | No programmatic mitigation measures are required. | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | | |
| **Greenhouse Gases** | | |
| **GHG-1:** The project may generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. | Refer to Programmatic Mitigation Measures AQ-7. | Less than significant impact |
| **GHG-2:** The project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. | No programmatic mitigation measures are required. | Less than significant impact |
| **Hazards and Hazardous Materials** | | |
| **HAZ-1:** The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. | No programmatic mitigation measures are required. | Less than significant impact |
| **HAZ-2:** The project may create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. | **MM HAZ-1:** Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant. | Less than significant impact |
| **HAZ-3:** Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? | No programmatic mitigation measures are required. | Less than significant impact |
| **HAZ-4:** The project may be situated on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 which may create a potentially significant hazard to the public or the environment as a result. | **MM HAZ-2:** Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| | local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.<br><br>Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.<br><br>Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed. | |
| **HAZ-5:** Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | No programmatic mitigation measures are required. | Less than significant impact |
| **Hydrology and Water Quality** | | |
| **HWQ-1:** Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | No programmatic mitigation measures are required. | Less than significant impact |
| **HWQ-2:** The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. | No programmatic mitigation measures are required. | Less than significant impact |
| **HWQ-3:** The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off site. | No programmatic mitigation measures are required. | Less than significant impact |
| **HWQ-4:** The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County | No programmatic mitigation measures are required. | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site. | | |
| **HWQ-5:** The project may substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner that would create or contribute to runoff water and exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. | **MM HYD-1:** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements. | Less than significant impact |
| **HWQ-6:** The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. | No programmatic mitigation measures are required. | Less than significant impact |
| **Land Use and Planning** | | |
| **LUP-1:** The project would not 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. | No programmatic mitigation measures are required. | Less than significant impact |
| **Noise** | | |
| **NOI-1:** The project may result in the 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. | **MM NOI-1:** At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:<br>• Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County' exterior noise standards.<br>• For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
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| | project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment. | |
| **NOI-2:** The project may result in the generation of excessive groundborne vibration or groundborne noise levels. | **MM NOI-2:** At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment. | Less than significant impact |
| **Population and Housing** | | |
| **POP-1:** The project would not 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). | No programmatic mitigation measures are required. | Less than significant impact |
| **POP-2:** The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. | No programmatic mitigation measures are required. | Less than significant impact |
| **Public Services** | | |
| **PUB-1:** The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. | No programmatic mitigation measures are required. | Less than significant impact |
| **PUB-2:** The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered school, library, or other public facilities in order | No programmatic mitigation measures are required. | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| to maintain acceptable service ratios or other performance objectives. | | |
| **Recreation** | | |
| **REC-1:** The project would not 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. | No programmatic mitigation measures are required. | Less than significant impact |
| **REC-2:** The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. | No programmatic mitigation measures are required. | Less than significant impact |
| **REC-3:** The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. | No programmatic mitigation measures are required. | Less than significant impact |
| **Transportation** | | |
| **TRA-1:** The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. | No programmatic mitigation measures are required. | Less than significant impact |
| **TRA-2:** The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). | No programmatic mitigation measures are required. | Less than significant impact |
| **TRA-3:** The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). | No programmatic mitigation measures are required. | Less than significant impact |
| **TRA-4:** The project would not result in inadequate emergency access. | No programmatic mitigation measures are required. | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| **Tribal Cultural Resources** | | |
| **TCR-1:** The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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 listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). | Refer to Programmatic Mitigation Measures CUL-1 through CUL-3 from Section 3.3, Cultural Resources. | Less than significant impact |
| **TCR-2:** The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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 PRC Section 5024.1. | Refer to Programmatic Mitigation Measures CUL-1 through CUL-3 from Section 3.3, Cultural Resources. | Less than significant impact |
| **Utilities and Service Systems** | | |
| **USS-1:** The project may 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. | **MM-USS-1:** Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.<br><br>The Golden State Water Company Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations.<br><br>**MM-USS-2:** Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public | Less than significant impact |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| | Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity.<br><br>**MM-USS-3:** New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.<br><br>Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.<br><br>CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." The following are "Public Interest" criteria:<br><br>• Eliminate an unusually heavy concentration of overhead lines<br>• Involve a street or road with a high volume of public traffic<br>• Benefit a civic or public recreation area or area of unusual scenic interest<br>• Be listed as an arterial street or major collector as defined by the governor's OPR Guidelines<br><br>Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year "borrow forward" if required), and the creation of a utility underground district.<br><br>The following areas deserve some consideration for a Rule 20A undergrounding process:<br><br>• Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit. | |

| Impact | Programmatic Mitigation Measure | Significance after Mitigation |
|---|---|---|
| | • Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit.<br>• Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area.<br>• Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area.<br>Refer to Programmatic Mitigation Measure HYD-1 from Section 3.8, Hydrology and Water Quality. | |
| **USS-2:** The project may have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. | Refer to Programmatic Mitigation Measures USS-1 through USS-3 and MM HYD-1 from Section 3.8, Hydrology and Water Quality. | Less than significant impact |
| **USS-3:** The project may result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. | Refer to Programmatic Mitigation Measures USS-1 through USS-3 and MM HYD-1 from Section 3.8, Hydrology and Water Quality. | Less than significant impact |
| **USS-4:** The project would not 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 programmatic mitigation measures are required. | Less than significant impact |
| **USS-5:** The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. | No programmatic mitigation measures are required. | Less than significant impact |

Notes:
AQMD = Air Quality Management District
AVAQMD = Antelope Valley AQMD
CRHR = California Register of Historical Resources
EPA = Environmental Protection Agency
g/L = grams per liter
PRC = Public Resources Code
SCAQMD = South Coast AQMD
VOC = volatile organic compound

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# 1.0 INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared by the Los Angeles County Department of Regional Planning, pursuant to the applicable provisions of the California Environmental Quality Act (CEQA) and its implementing guidelines, known as the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387). Los Angeles County is the lead agency for this EIR (State Clearinghouse Number 2021030300), which examines the potential physical impacts to the environment as a result of the proposed Slauson Station Transit Oriented Community (TOC) Specific plan, aka Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan), which encompasses the entire Los Angeles County unincorporated community of Florence-Firestone of approximately 3.48 square miles.

This Draft EIR evaluates impacts that could result from implementation of the proposed FFTOD Specific Plan as compared to existing conditions. CEQA requires that before a decision can be made to approve a project with potentially significant environmental impacts, an EIR must be prepared that fully describes the environmental impacts of the project and identifies feasible mitigation measures for significant impacts. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental consequences of a project, to recommend mitigation measures to lessen or eliminate adverse impacts, and to examine feasible alternatives to the project. The information contained in this Draft EIR is to be reviewed and considered by the governing agency prior to the ultimate decision to approve, disapprove, or modify the project.

## 1.1 TYPE AND PURPOSE OF THIS EIR

This EIR is a program EIR prepared in accordance with CEQA Guidelines Section 15168. Although the legally required contents of a program EIR are the same as for a project EIR, program EIRs are typically more conceptual than project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, later activities in the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, many later activities may be within the program EIR's scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a lead agency relies on a program EIR for a later activity, it must incorporate feasible mitigation measures and alternatives from the program EIR into the later activities (Guidelines Section 15168[c][3]). If a later activity would have effects

outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis.

The mitigation measures described in this document are for a program-level decision (referred to as "programmatic mitigation measures") and are intended to be used to avoid, minimize, or reduce potentially significant environmental impacts of future development projects pursuant to implementation of the FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from this EIR. As part of these second-tier environmental reviews, the individual project applicants—in coordination with Los Angeles County—will use the programmatic mitigation measures identified in this program document as starting points to determine their applicability to a specific project and to develop additional or more specific mitigation measures (as necessary) for significant adverse impacts identified in the project-specific analysis associated with their specific location and type of action. The CEQA monitoring process includes review, guidance, and reporting components. Second-tier document individual project applicants—in coordination with Los Angeles County—will note which applicable programmatic mitigation measures are being adopted and used and explain why others are not. In coordination with Los Angeles County, individual project applicants will provide a schedule for implementing the adopted mitigation measures and for reviewing the implementation of those measures.

## 1.2 PROJECT OVERVIEW

The proposed FFTOD Specific Plan will implement the Los Angeles County General Plan 2035 (General Plan) Transit Oriented District (TOD) Program. Transit oriented districts are defined in the General Plan as the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community there are three LA Metro A (Blue) Line stations: the Slauson, Florence, and Firestone stations. The goals of the FFTOD Specific Plan are to create transit-accessible housing development; increase job-generating uses and economic activity; develop a safe and attractive transportation network; increase walking, bicycling, and transit ridership; and streamline the environmental review process for future development projects in the community.

The FFTOD Specific Plan would amend the land use designations and establish new zones, primarily within the 0.5 mile TOD area of the three LA Metro A Line stations, which include land use, development standards and design standards appropriate for meeting the planned density and intensity in alignment with the General Plan Land Use Designations. The FFTOD Specific Plan proposes the following nine new zones: Industrial Flex (IF), Mixed-Use 1 (MU-1), Mixed-Use 2 (MU-2), Mixed-Use 3 (MU-3), Mixed-Use Transit (MU-T), Residential Low-Medium 1 (RLM-1), Residential Low-Medium 2 (RLM-2), Residential Medium (RM), and Residential Slauson Station (RSS). These zone names/titles are subject to change to align with Los Angeles County naming conventions as the FFTOD Specific Plan is further developed. New development standards for zones would also include setback and parking standards to address mobility issues in the community. The project would also rezone sites identified for the Regional Housing Needs Assessment by the Housing Element update.

In addition to establishing new zones and rezoning sites as described above, the project would amend and incorporate the standards of the Florence-Firestone Community Standards District into

the FFTOD Specific Plan. Incorporation of the Florence-Firestone Community Standards District would allow all the land use regulations applicable to the Florence-Firestone community to be provided in a single document for ease of review and implementation.

See Chapter 2, Project Description, for a more detailed description of the FFTOD Specific Plan Area and its location.

## 1.3 THE CEQA EIR PROCESS

On March 15, 2021, Los Angeles County issued a Notice of Preparation (NOP) and Initial Study in accordance with CEQA Guidelines Section 15082 that was sent to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties. The NOP and Initial Study were circulated for 30 days, until April 14, 2021. The NOP requested those agencies with regulatory authority over any aspect of the project to review the issues that would be addressed in the Draft EIR and to identify any additional relevant environmental issues that should be addressed.

Comment letters were received by Los Angeles County from six agencies, two organizations, and six individuals in response to the NOP and Initial Study. The NOP, Initial Study, and comment letters are provided in Appendix A. A general summary of the areas of concern raised in these letters is provided in Table 1-1.

**Table 1-1: Summary of Comments in Response to the NOP and Initial Study**

| Commenter/Date | Summary of Comment | Location of Discussion |
|---|---|---|
| **State Agencies** | | |
| Department of Transportation (Caltrans) District 7<br>March 26, 2021 | The comment letter recommends that other mobility improvements be implemented outside of widening sidewalks and expanding right-of-way or private setback conditions. The comment recommends narrowing or eliminating car travel lanes to allow for calmer traffic and shorter crossing distances. The comment letter also encourages the lead agency to eliminate parking requirements altogether and to implement Transportation Demand Management strategies as an alternative to building excessive car parking. | Section 3.14, Transportation |
| **Regional Agencies** | | |
| South Coast Air Quality Management District<br>April 6, 2021 | The comment letter recommends that the lead agency use South Coast AQMD's CEQA Air Quality Handbook, Air Quality and Land Use Handbook, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, and CalEEMod2 as guidance when preparing the air quality and greenhouse gas analyses. The comment letter also recommends following South Coast AQMD's CEQA regional pollutant emissions significance thresholds and to consider impacts from both construction and operation. The comment letter also states that if the project results in significant adverse air quality impacts, all feasible mitigation measures that go beyond what is required by law be used to minimize these impacts, and any impacts resulting from mitigation measures must also be analyzed. | Section 3.2, Air Quality |

| Commenter/Date | Summary of Comment | Location of Discussion |
|---|---|---|
| **Local Agencies** | | |
| County of Los Angeles, Department of Parks and Recreation<br>April 7, 2021 | The comment letter recommends changes in language for the Los Angeles County ratio of park space to residents and for the very high park need of Florence-Firestone. | Section 3.13, Recreation |
| County of Los Angeles, Fire Department<br>March 30 and April 6, 2021 | The comment letter includes recommendations and requirements from the Land Development Unit for Fire Apparatus Access Roads, fire lanes, clearance for fire hydrants, and vehicular access, as well as the Forestry Division for a Los Angeles County Oak Tree Ordinance permit. | Section 3.12, Public Services<br>Section 5.1, Effects Found Not to Be Significant |
| County of Los Angeles, Sheriff's Department<br>April 14, 2021 | The comment letter states that the project would increase daily population in Los Angeles Sanitation District's service area and the anticipated ridership, which would potentially require additional personnel, staff, vehicles, and/or equipment. The comment letter recommends that analysis be completed to properly address proposed individual and cumulative impacts related to population growth and identify safety concerns. In addition, the comment letter recommends that development from the project follows the general principles of Crime Prevention through Environmental Design. | Section 3.12, Public Services |
| County of Los Angeles, Department of Public Health, Division of Environmental Health<br>April 22, 2021 | The comment letter states that the County of Los Angeles Department of Public Health, Division of Environmental Health does not have any comments on the project. | Not Applicable |
| **Organizations** | | |
| Communities for a Better Environment<br>April 19, 2021 | The comment letter recommends that the project use anti-displacement strategies to ensure community stability, including public participation, affordable housing, a traffic and parking study, and literature reviewing benefits and costs of the project for the community. The comment letter suggests a thorough analysis for soil contamination and hazardous waste, as well as groundwater contamination and water quality. The comment letter recommends additional analysis on impacts for park equity, the Florence-Firestone library, and historic places. | Section 3.3, Cultural Resources<br>Section 3.5, Geology & Soils<br>Section 3.7, Hazards & Hazardous Materials<br>Section 3.8, Hydrology & Water Quality<br>Section 3.11, Population & Housing<br>Section 3.12, Public Services<br>Section 3.13, Recreation<br>Section 3.14, Transportation |
| Los Angeles Conservancy<br>April 14, 2021 | The comment letter recommends that the project conduct a Historic Resources Survey that includes a community outreach component and to explore historic designation of identified properties of interest and the potential historic district along Miramonte Boulevard. The comment letter recommends additional preservation alternatives to be evaluated and considered, and to examine the feasibility of adaptive reuse, modifications to zoning/land use, and introduction of incentive mechanisms in conjunction with the goals and objectives for the FFTOD. The comment letter requests a meeting with both Los Angeles County and Florence-Firestone advocates. | Section 3.3, Cultural Resources |

| Commenter/Date | Summary of Comment | Location of Discussion |
|---|---|---|
| **Individuals** | | |
| Brian Wong<br>April 2, 2021 | The commenter expresses interest in the project and asks if there are population growth estimates associated with implementation of the FFTOD Specific Plan. | Section 3.11, Population & Housing |
| Ashley Orona<br>April 14, 2021 | The commenter shares concerns regarding lack of parking and recommends a parking study, building height and privacy, and relocation of the Florence Library. The comment letter recommends that rezoning should be limited to main streets and rezoning should be avoided for culturally significant buildings. The comment letter includes a list of these buildings. | Section 3.3, Cultural Resources<br>Section 3.9, Land Use<br>Section 3.11, Population & Housing<br>Section 3.12, Public Services<br>Section 3.14, Transportation |
| Astrid Campos<br>April 14, 2021 | The commenter shares concerns regarding building height for privacy, rezoning of Miramontes, parking, pollution, traffic, Florence Library, ground-borne vibration, and rezoning of residential areas. | Section 3.3, Cultural Resources<br>Section 3.9, Land Use<br>Section 3.10, Noise<br>Section 3.11, Population & Housing<br>Section 3.12, Public Services<br>Section 3.14, Transportation |
| Mia Martinez<br>April 14, 2021 | The commenter shares concerns regarding gentrification and displacement and recommends using the median income of the community from the U.S. Census. | Section 3.9, Land Use<br>Section 3.11, Population & Housing |
| Silvia Trevino<br>April 14, 2021 | The commenter shares concerns regarding the need for more affordable housing for the unhoused and residents in the community of Florence-Firestone. The commenter recommends the following issues be addressed: parking crises, improvements in electric and internet utilities, increases in community resources for public facilities, and minimizing displacement and gentrification. | Section 3.3, Cultural Resources<br>Section 3.9, Land Use<br>Section 3.11, Population & Housing<br>Section 3.12, Public Services<br>Section 3.14, Transportation |
| Yanel Saenz<br>April 14, 2021 | The commenter recommends that more outreach be coordinated for the project. The commenter states that Roosevelt Park pedestrian bridge, the Firestone LA Metro Station, and the Slauson LA Metro Station provides scenic vistas and should be considered for aesthetics. The commenter recommends that: historic properties should not be rezoned and includes a list of these properties, Florence Library should be relocated, and residential zoning changes should consider more outreach and mitigate for displacement and gentrification. | Section 3.1, Aesthetics<br>Section 3.3, Cultural Resources<br>Section 3.9, Land Use<br>Section 3.10, Noise<br>Section 3.11, Population & Housing<br>Section 3.12, Public Services<br>Section 3.14, Transportation |

Notes:
CEQA = California Environmental Quality Act
FFTOD = Florence-Firestone Transit Oriented District
NOP = Notice of Preparation

In addition, an online public scoping meeting was held on March 25, 2021, at 5:00 p.m. via Zoom. The intent of the scoping meeting was to solicit written comments regarding the environmental issues that should be evaluated in the Draft EIR. A summary of the scoping meeting and comments received at the scoping meeting are provided in Table 1-2.

**Table 1-2: Summary of Comments from Scoping Meeting**

| Summary of Comments/Questions | Location of Discussion |
|---|---|
| Comments/questions were expressed about the industrial flex zone and other concurrent housing projects with concerns for parking and traffic studies. Question was asked about effects on commercial or industrial businesses within the 0.5-mile radius of the LA Metro stations. | Section 3.9, Land Use<br>Section 3.11, Population & Housing<br>Section 3.14, Transportation |
| Comments/questions were expressed about adding green space and trees to mitigate air pollution. | Section 3.2, Air Quality |
| Comments/questions were expressed about density increases, housing units, locations, and affordable housing requirements. Question was asked about lowering median income for affordable housing requirements. Question was asked more information for the housing element. | Section 3.11, Population & Housing |
| Comments/questions were made about FFTOD Specific Plan distribution. Comment was made about residents needing more outreach and mailings, an extended comment period, and more opportunities for community involvement. Comment was made about level of awareness within the Florence-Firestone community regarding zone changes. Question was asked about informing homeowners of zone changes. | The Draft FFTOD Specific Plan will be available for public review along with the Draft EIR. |
| Comments/questions were made about relocating the Florence Library. | Section 3.12, Public Services |
| Comments/questions were made about aesthetics and scenic impacts on Roosevelt Park Pedestrian Bridge, which a commenter stated is a scenic resource. | Section 3.1, Aesthetics |
| Comments/questions were made about cultural resources and historic properties and that they should not be impacted. | Section 3.3, Cultural Resources |
| Comments/questions were made about noise and ground-borne vibration for homes within a 0.5-mile radius of trains. | Section 3.10, Noise |

## 1.4 PUBLIC REVIEW OF THE DRAFT EIR

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR will be available for public review on the project website: https://planning.lacounty.gov/fftod.

Interested parties may provide written comments on the Draft EIR. Written comments should be addressed to:

Patricia Hachiya, Supervising Regional Planner
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, California 90012
Telephone: (213) 974-6316
Fax: (213) 626-0434
Email: phachiya@planning.lacounty.gov

On completion of the 45-day review period, written responses to all comments on the environmental issues discussed in the Draft EIR will be prepared and incorporated into a Final EIR. Furthermore, written responses to comments received from any state agencies will be made available to those agencies at least 10 days prior to the public hearing at which certification of the

Final EIR will be considered. These comments, and their responses, will be included in the Final EIR for consideration by Los Angeles County, as well as other responsible agencies under CEQA. The Final EIR may also contain corrections and additions to the Draft EIR and other information relevant to the environmental issues associated with the project. All persons who comment on the Draft EIR will be notified of the availability of the Final EIR and the date of any public hearing(s).

## 1.5 ORGANIZATION OF THIS DRAFT EIR

In accordance with the CEQA Guidelines, this Draft EIR addresses the potential environmental impacts of the project and was prepared following input from the public and the responsible and affected agencies, through the CEQA environmental process. The content and format of this Draft EIR meets the current requirements of CEQA and the CEQA Guidelines.

The Draft EIR is organized into the following chapters. To help the reader locate information of particular interest, a brief summary of the contents of each chapter of the Draft EIR is provided below:

- **Executive Summary**: This chapter provides a brief summary of the FFTOD Specific Plan Area, the project, and alternatives. The Executive Summary culminates with Table ES-1, Summary of Environmental Impacts and Mitigation Measures. This table lists each identified environmental impact, proposed mitigation measure (if any), and the level of significance after implementation of each mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be less than significant or significant and unavoidable.
- **Chapter 1—Introduction**: This chapter provides an overview of the project, the purpose and use of the Draft EIR, the scope of this Draft EIR, a summary of the legal authority for this Draft EIR, a summary of the environmental review process for the EIR, and the general format of the document.
- **Chapter 2—Project Description**: This chapter provides a detailed description of the project. The description also includes the project goals and objectives.
- **Chapter 3—Environmental Setting, Impacts, and Mitigation Measures**: This chapter provides a discussion of the setting (existing conditions) including existing regulations, the environmental impacts including potential cumulative impacts that could result from the project, and the mitigation measures that would reduce or eliminate the identified adverse impacts. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable. Adopted regulations, which serve to reduce potential adverse effects that the project would be required to comply with, are discussed as appropriate.
- **Chapter 4—Alternatives**: This chapter describes and analyzes a reasonable range of alternatives to the project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the project.
- **Chapter 5—Other CEQA Considerations**: This chapter provides a discussion of various CEQA-mandated considerations including a summary of significant and unavoidable impacts, growth-inducing impacts, and significant irreversible changes.
- **Chapter 6—List of Preparers**: This chapter lists authors of the Draft EIR and Los Angeles County staff that assisted with the preparation and review of this document.
- **Chapter 7—Acronyms and Abbreviations**: This chapter provides a list of the acronyms used throughout this Draft EIR.

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# 2.0 PROJECT DESCRIPTION

## 2.1 INTRODUCTION

The Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) would establish transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5-mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit-oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. (Los Angeles County 2015). The FFTOD Specific Plan would build from the 2019 Florence-Firestone Community Plan (FFCP) by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA) (Los Angeles County 2014). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

This chapter provides a detailed description of the project, including the location, existing characteristics of the FFTOD Specific Plan Area, the objectives and guiding principles of the FFTOD Specific Plan, the actions proposed by the FFTOD Specific Plan, and the required discretionary approvals.

## 2.2 PROJECT LOCATION AND EXISTING CHARACTERISTICS

### 2.2.1 Florence-Firestone Community

The proposed FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line

connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. The regional location of the FFTOD Specific Plan Area is shown in Figure 2-1 and the project location is shown in Figure 2-2. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

### 2.2.2 Specific Plan Area

The FFTOD Specific Plan Area boundary is consistent with the FFCP boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

The community includes three LA Metro A (Blue) Line Stations; the Slauson, Florence, and Firestone stations. The 0.5-mile radius around each of these stations is considered the TOD area for that station. In 2019, the Slauson Station had an average daily ridership of 1,850; Florence Station had an average daily ridership of approximately 2,342; and Firestone Station had an average daily ridership of 3,214 (DRP 2020a).

Major streets in the Slauson Metro A Line area include Slauson Avenue, Gage Avenue, Compton Avenue, Miramonte Boulevard, and Holmes Avenue. The Slauson Metro A Line Station is configured as an aerial station, with pedestrian access available from the east side via Slauson Avenue. Overall access to this station is highly constrained based on location, configuration, the presence of the rail line immediately north of Slauson Avenue, and the limited residential or commercial uses in the 0.5-mile TOD area (DRP 2020b). The Slauson Station is also the future home of a new West Santa Ana Branch light rail station; this transit corridor is planned to connect southeast Los Angeles County to downtown Los Angeles, serving the cities and communities of Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, and the Florence-Firestone Community. Metro is also planning the Rail-to-River corridor that will extend along Slauson Avenue in the transit oriented district area, but outside the FFTOD Specific Plan boundary.

Major streets in the Florence Metro A Line area include Florence Avenue, Nadeau Street, Compton Avenue, and Miramonte Boulevard. The Florence Metro A Line Station is configured as an at-grade station with pedestrian access from the east side of the Metro rail line via Florence Avenue, and a Metro Park & Ride surface parking lot for transit riders.

Major streets in the Firestone Metro A Line Station area include Firestone Boulevard and Compton Avenue. Firestone Metro A Line Station is configured as an aerial station with pedestrian access from the east side of the Metro rail line via Graham Avenue; access is not available from Colonel Leo H. Washington Park, immediately west of the station.

Existing conditions and uses are varied throughout the FFTOD Specific Plan Area with residential uses being the dominant use by land area. The major corridors in the FFTOD Specific Plan Area include Compton Avenue, Florence Avenue, Nadeau Street, and Firestone Boulevard, and are characterized by low-scale commercial and industrial uses on small lots. Although the Compton

Avenue corridor has been designated as commercial, a variety of single-family detached homes remain fronting the corridor, increasing in frequency south of Florence Avenue. The Slauson Avenue corridor is characterized by a variety of commercial properties including general commercial, automobile-related, and retail and restaurants, as well as industrial. The Florence Avenue corridor is characterized by a variety of commercial uses in a range of small to medium parcel sizes. This corridor was redesignated as mixed use as part of the 2019 FFCP, providing an opportunity for these generally low-intensity uses to be redeveloped as mixed use, inclusive of residential uses. The existing general plan land use designations for the area are shown in Figure 2-3.

## 2.3 PROJECT OBJECTIVES

The project objectives are to:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

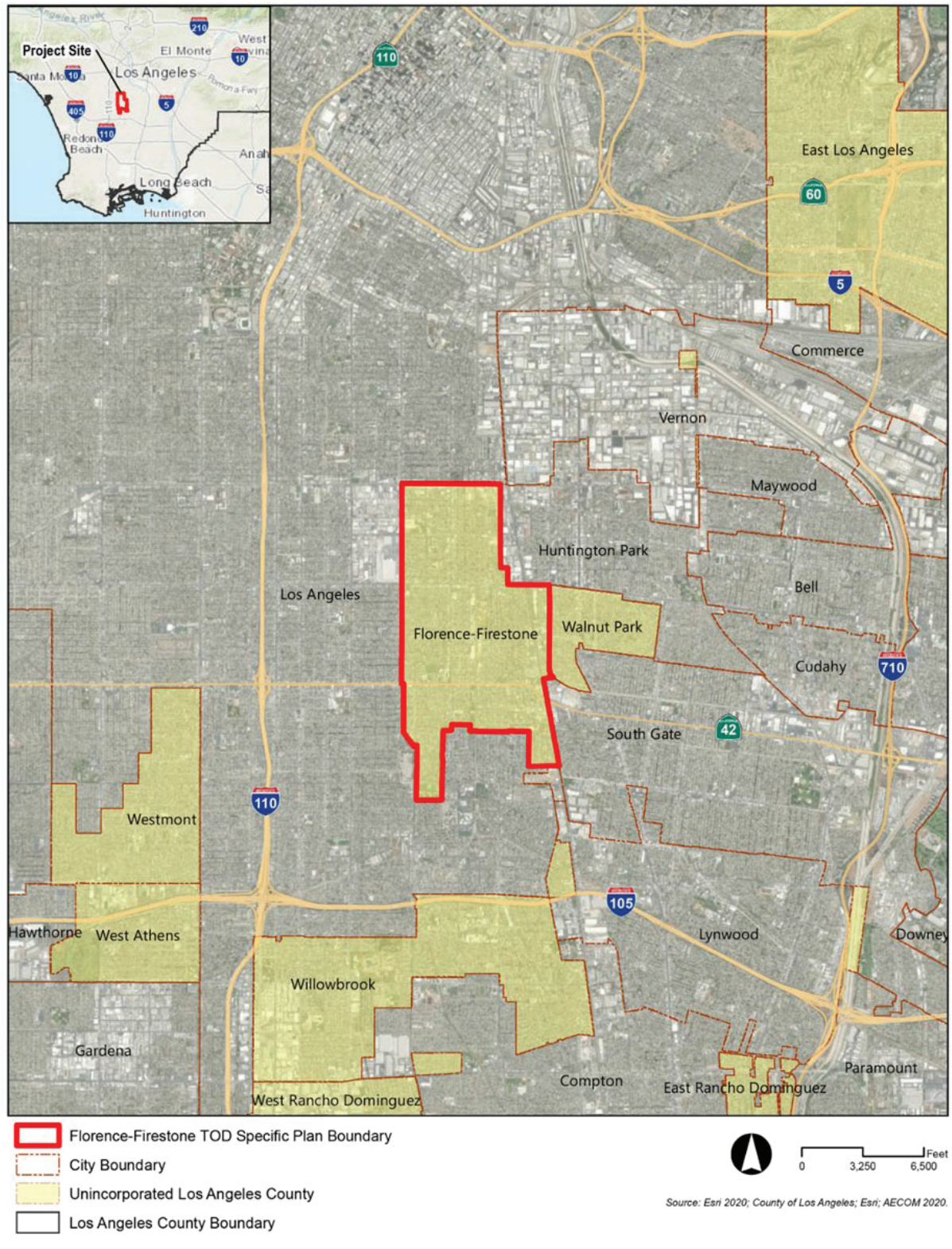
The FFTOD Specific Plan objectives were identified by the TOD Program and the Florence-Firestone Community Plan in collaboration with Caltrans.

## 2.4 SPECIFIC PLAN GUIDING PRINCIPLES

The FFTOD Specific Plan includes the following Guiding Principles that reinforce the policies of the FFCP to guide TOD development. These guiding principles were developed based on the project objectives, policies from the Florence-Firestone Community Plan, and informed by community feedback from public outreach conducted during the FFTOD Specific Plan process.

- *Guiding Principle 1*: Promote pedestrian-friendly, active transit oriented districts and corridors that support land uses that provide a variety of local services, employment, and housing.
- *Guiding Principle 2*: Increase housing supply near transit that includes a variety of options for residents and families at different income levels.
- *Guiding Principle 3*: Support a green community through enhanced streetscapes, a variety of publicly accessible open spaces, landscaping, and sustainability.
- *Guiding Principle 4*: Encourage placemaking that embraces the vibrant culture of the community.
- *Guiding Principle 5*: Support local jobs and opportunities through a variety of employment-generating uses.
- *Guiding Principle 6*: Improve safety, connectivity, access, and ease of use for all modes of transportation.
- *Guiding Principle 7*: Collaborate to promote equitable outcomes and inclusive economic development.
- *Guiding Principle 8*: Collaborate with other local and regional entities to implement plan objectives efficiently and comprehensively.

## Figure 2-1: Regional Location



## Figure 2-2: Project Location

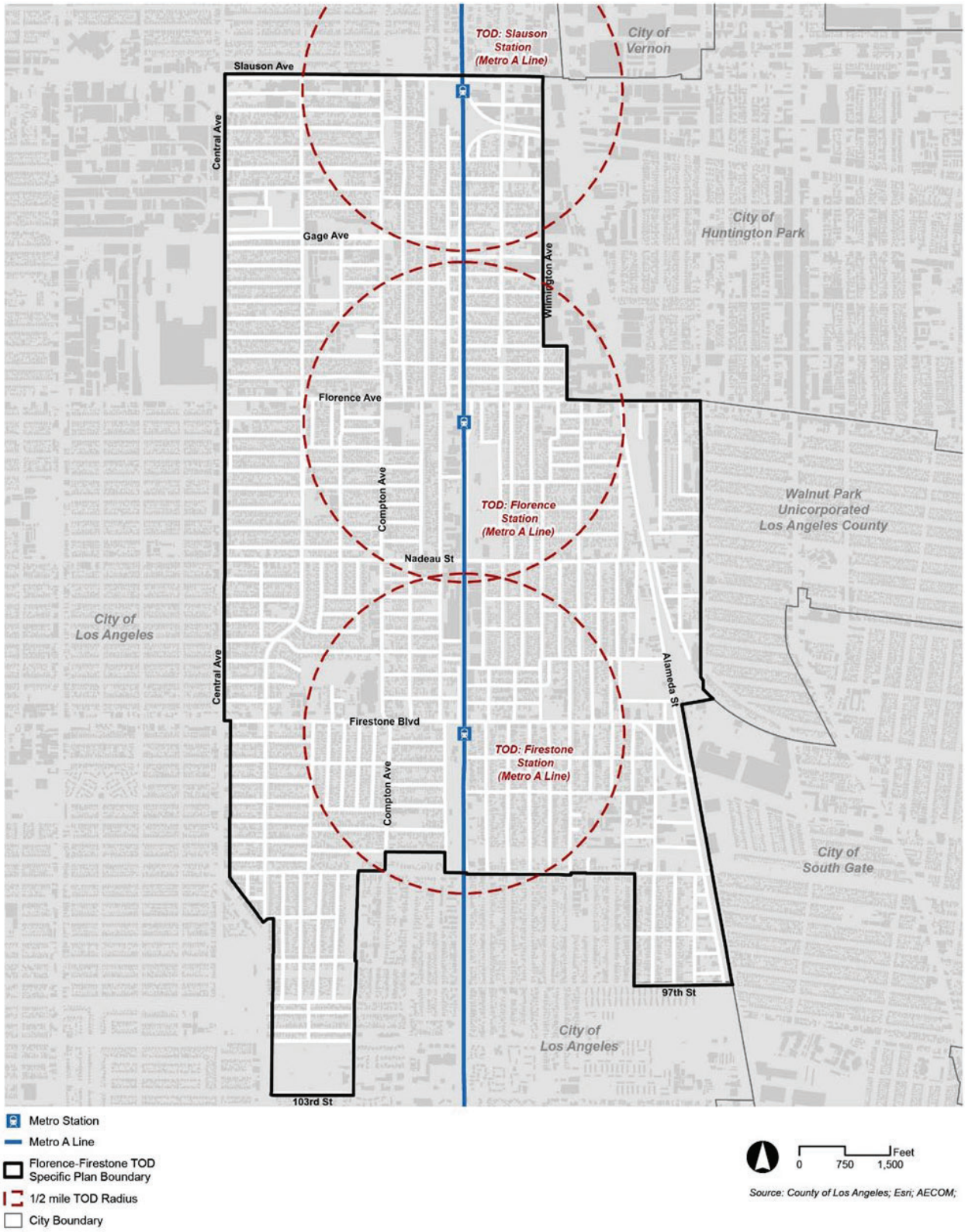
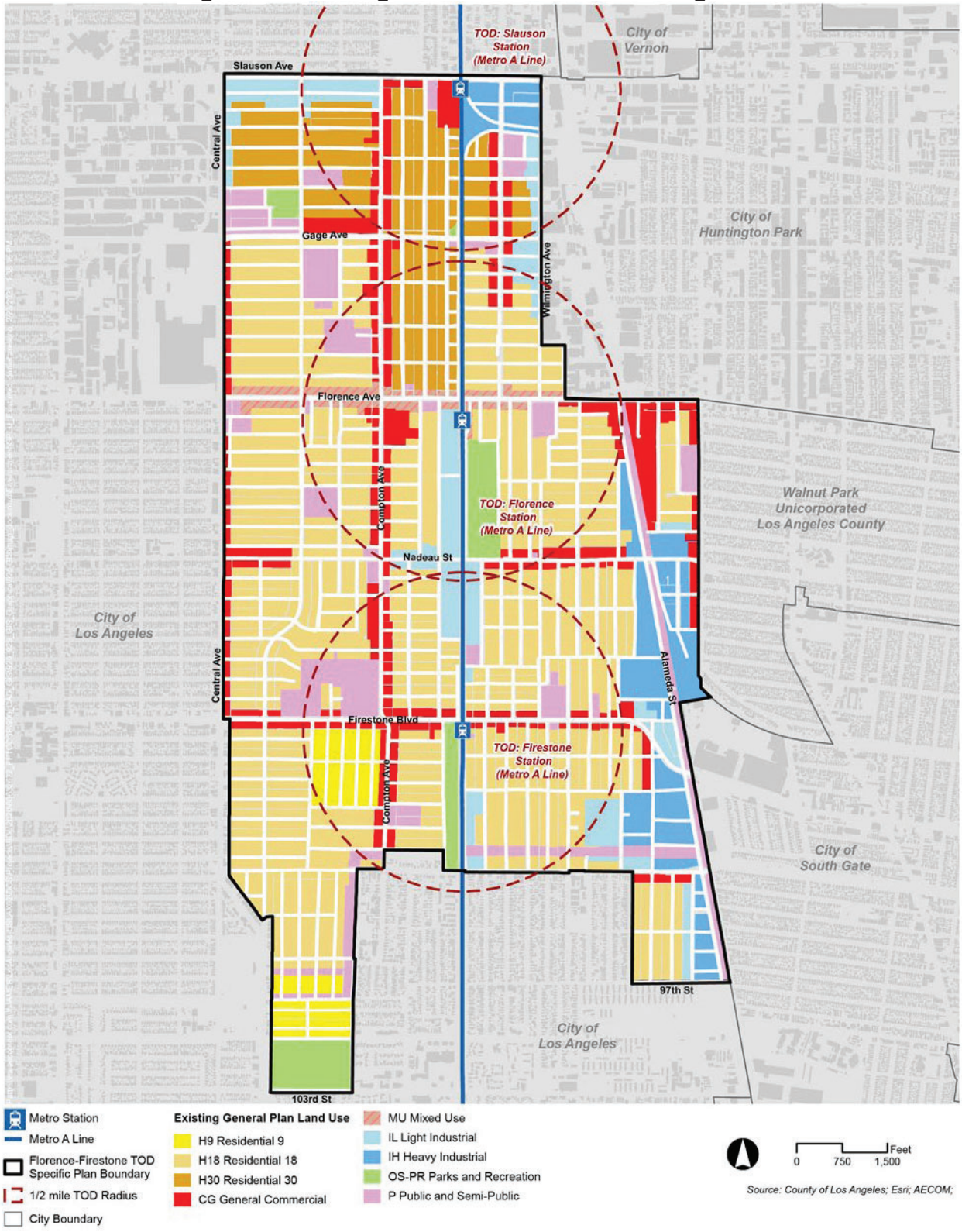


**Figure 2-3: Existing General Plan Land Use Designations**



# 2.5 PROJECT CHARACTERISTICS

## 2.5.1 Overview

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

## 2.5.2 Proposed General Plan Land Use Amendments

The project includes General Plan Land Use amendments to approximately 953.06 acres of land in the FFTOD Specific Plan Area to provide consistency with the General Plan policy direction. The updated land use designations are supported by development of new zones for the FFTOD Specific Plan to support transit oriented investment. Areas outside of the transit oriented development areas are considered stability areas (all nongray areas shown in Figure 2-6 are considered stability areas). Targeted changes in the stability areas are generally limited to addressing Housing Element Update RHNA, creating cohesive blocks that connect to the transit oriented development areas or reconciling designations with adjacent jurisdiction plans. The expected buildouts under the FFTOD Specific Plan based on the land use designation updates and zoning strategy are provided in Table 2-1. The planning land use designations that would be amended concurrently into the General Plan and the FFCP are shown in Figure 2-4.

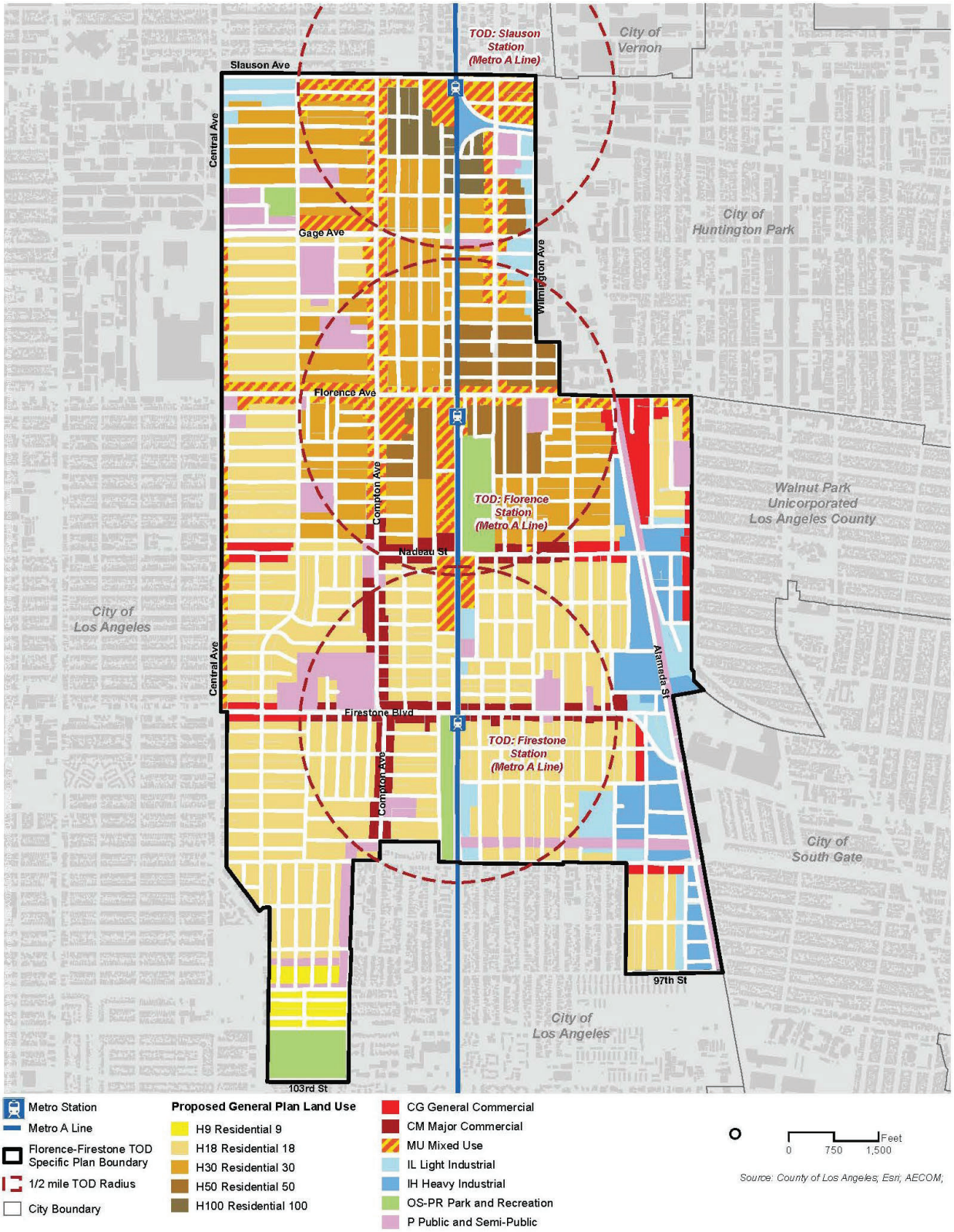
**Table 2-1: Specific Plan Land Use Summary**

| Land Use Designation | Zones | Acres | Percent of Plan Area | Net New Estimated Buildout Potential | |
|---|---|---|---|---|---|
| | | | | Residential (Units) | Nonresidential (SF) |
| **TOD and RHNA Areas** | | **953.06** | | **12,110** | **1,183,013** |
| Mixed Use (MU) | MU Transit (MU-T) | 38.34 | 2.21% | 1,585 | 173,799.87 |
| | MU 3 (MU-3) | 27.07 | 1.56% | 1,002 | 131,159.28 |
| | MU 2 (MU-2) | 39.80 | 2.30% | 978 | 107,142.02 |
| | MU Development (MXD) | 75.83 | 4.37% | 7,229 | 673,980.70 |

| Land Use Designation | Zones | Acres | Percent of Plan Area | Net New Estimated Buildout Potential | |
|---|---|---|---|---|---|
| | | | | Residential (Units) | Nonresidential (SF) |
| Major Commercial (CM) | MU 1 (MU-1) | 53.71 | 3.10% | 652 | 94,951.88 |
| Residential 100 (H100) | Residential Slauson Station (RSS) | 24.44 | 1.41% | 301 | |
| Residential 50 (H150) | Residential Medium (RM) | 69.51 | 4.01% | 61 | |
| Residential 30 (H30) | Residential Low-Medium 2 (RLM-2) | 275.09 | 15.87% | 158 | |
| Residential 18 (H18) | Residential Low-Medium 1 (RLM-1) | 303.25 | 17.50% | 144 | 1,979.05 |
| Light Industrial (IL) | Industrial Mix (IX) | 46.01 | 2.65% | - | - |
| **Stability Areas** | | **780.12** | | **0** | **0** |
| Residential 9 (H9) | Single-Family Residence (R-1) | 23.06 | 1.33% | - | - |
| Residential 18 (H18) | Two-Family Residence (R-2) | 182.88 | 10.55% | - | - |
| | Limited Density Multiple Residence (R-3) | 194.64 | 11.23% | - | - |
| Residential 9 (H9) | Medium Density Multiple Residence (R-4) | 0.43 | 0.02% | - | - |
| Residential 18 (H18) | Light Agricultural (A-1) | 0.28 | 0.02% | - | - |
| General Commercial (CG) | Neighborhood Business (C-2) | 4.58 | 0.26% | - | - |
| | General Commercial (C-3) | 33.71 | 1.95% | - | - |
| | Commercial Manufacturing (C-M) | 7.93 | 0.46% | - | - |
| Public and Semi-Public (P) | Institutional (IT) | 85.49 | 4.93% | - | - |
| Light Industrial (IL) | Light Manufacturing (M-1) | 33.15 | 1.91% | - | - |
| Heavy Industrial (IH) | Heavy Manufacturing (M-2) | 115.15 | 6.64% | - | - |
| Park and Recreation OS-PR | Open Space (OS) | 98.82 | 5.70% | - | - |
| | **Total** | **1733.19** | **100%** | **12,110** | **1,183,013** |

Notes:
RHNA = Regional Housing Needs Assessment
SF = square feet
TOD = Transit Oriented District
Estimated buildout is based on an assigned buildout factor that reflects market research, market trends, and the potential development opportunity presented by the proposed zoning changes.
The buildout factor represents a range of magnitude of reasonably expected development to occur through the year 2035.
Each of the proposed zones that allow residential units was then assigned an "Assumed Average Density" of dwelling units per acre (du/ac) to help characterize the kind of development likely to occur.
Estimated nonresidential development is based on square feet needed to meet the demand of the population living in the new residential units.

## Figure 2-4: Proposed TOD Supportive Land Use Designations



## 2.5.3 Proposed Specific Plan Zoning

The FFTOD Specific Plan proposes to rezone parcels in the FFTOD Specific Plan Area to encourage transit-oriented development in the area. This would support development within walking distance of the LA Metro stations (Slauson, Florence, and Firestone stations), and would be a combination of mixed-use, residential, and industrial mix uses, which are shown in Figure 2-5.

The FFTOD Specific Plan would allow existing development and uses within the FFTOD Specific Plan Area to continue until new development is proposed. The FFTOD Specific Plan would require all new land use and development within the FFTOD Specific Plan Area to conform to the FFTOD Specific Plan zoning designations described below.

### 2.5.3.1 Mixed Use Zones

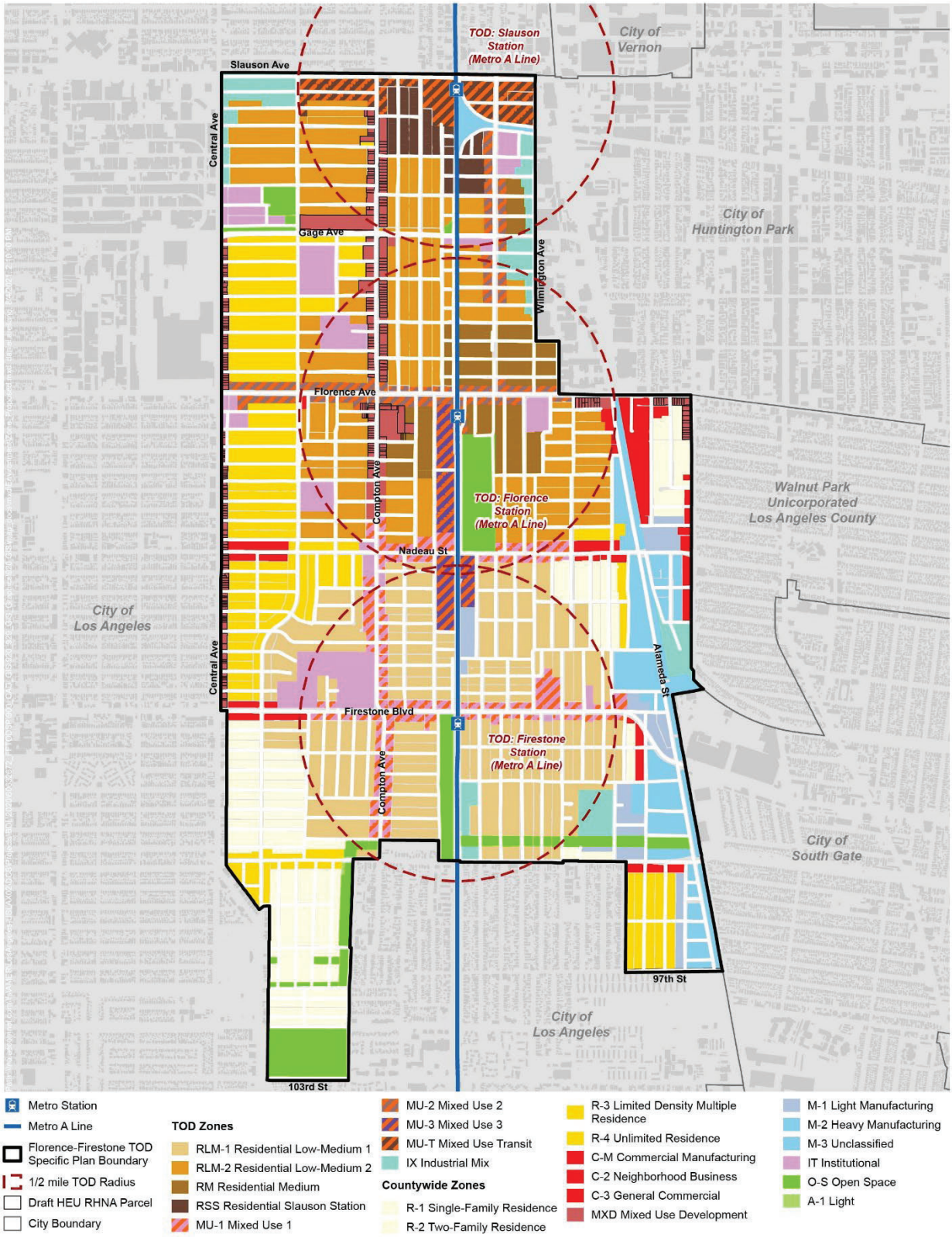
The general purpose of the Mixed Use (MU) zones is to provide support for transit oriented development with employment, homes, and services near transit stations. The MU Zone development standards would include a 3.0 maximum floor area ratio; a maximum density ranging from 50 density units per acre (du/ac) to 150 du/ac; a maximum building height ranging from 50 feet to 72 feet; and a minimum building setback of 2 feet for most street frontages (note: Florence Avenue has no minimum building setback.).The specific purpose for each MU Zone is as follows.

**Mixed Use 1 Zone:** The Mixed Use 1 (MU-1) Zone is intended to support mixed use corridors to provide a range of local neighborhood services and homes near transit. This zone implements the Major Commercial General Plan Land Use Designation. This zone would implement the Major Commercial (CM) General Plan Land Use Designation, which allows 30 to 150 du/net acre for residential uses and a maximum Floor Area Ratio (FAR) of 3.0 for nonresidential uses.

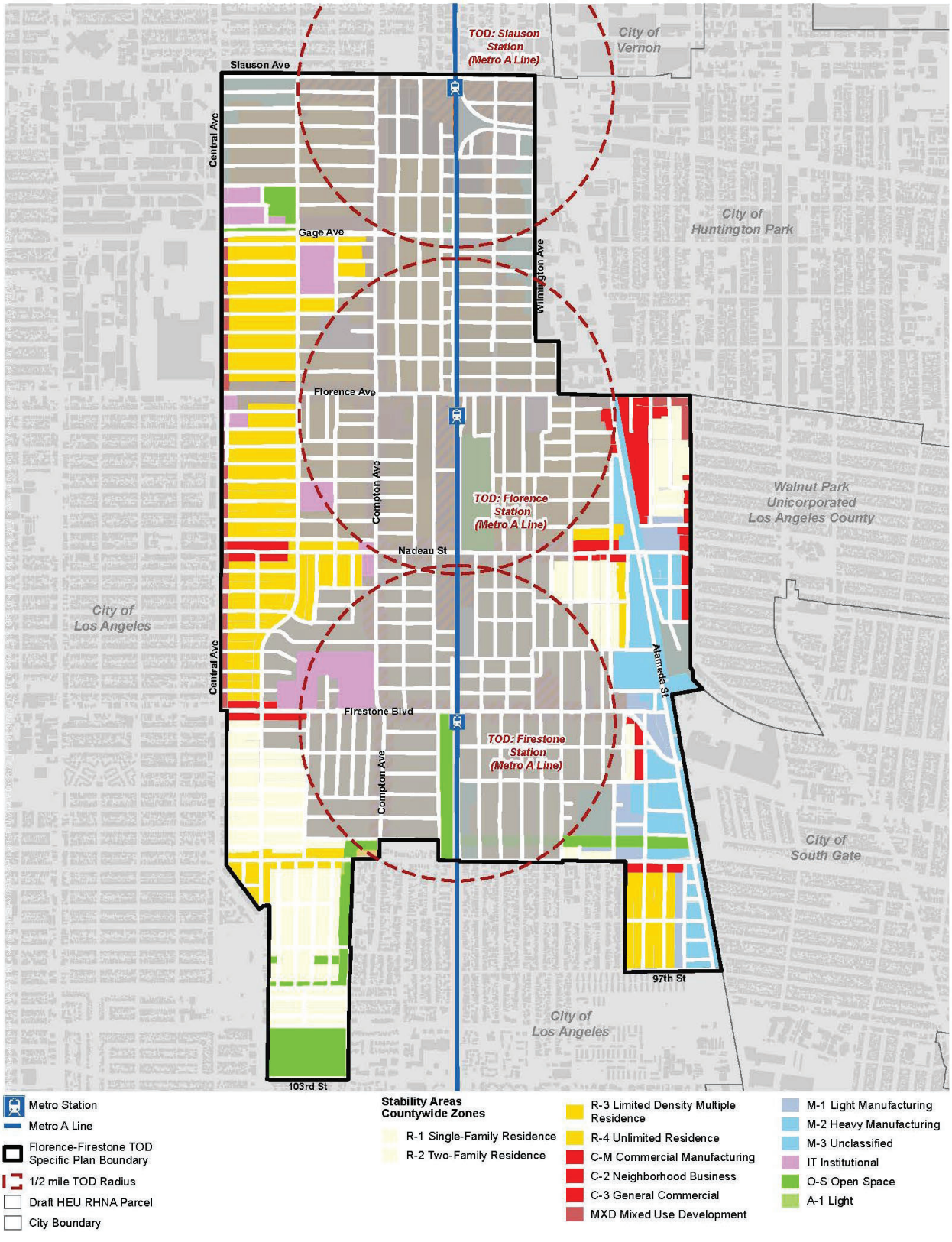
**Mixed Use 2 Zone:** The Mixed Use 2 (MU-2) Zone is intended to support "main street" retail, employment, and homes for the community near transit along existing commercial corridors surrounding the Slauson and Florence Transit Stations. This zone allows uses focused on local neighborhood services and homes. The MU-2 Zone encourages more housing and strengthened transit corridors to support transit use and accessibility, as well as business and workforce opportunities. This zone would implement the MU General Plan Land Use Designation, which allows 50 to 150 du/net acre for residential uses and a maximum FAR of 3.0 for nonresidential uses.

**Mixed Use 3 Zone:** The Mixed Use 3 (MU-3) Zone is intended to focus on employment and higher-density residential uses to create more jobs and homes for the community near transit, focused in existing industrial areas with large sites surrounding the Florence Station. The purpose is to create an employment-focused, high-intensity mixed use transit district that allows the creation of transition areas between industrial uses (such as offices) to abut homes, thereby supporting the goals of the Los Angeles County Green Zones Program and Ordinance. The MU-3 Zone encourages the additional business and workforce opportunities as well as housing focused around the Florence Station. This zone would implement the Mixed Use (MU) General Plan Land Use Designation, which allows 50 to 150 du/net acre for residential uses and a maximum FAR of 3.0 for nonresidential uses.

## Figure 2-5: Proposed FFTOD Specific Plan Zoning



## Figure 2-6: Proposed FFTOD Specific Plan Stability Areas



**Mixed Use Transit Zone:** The Mixed Use Transit (MU-T) Zone is intended to create a higher intensity mixed use transit district with a variety of housing, jobs, and neighborhood services in existing commercial and industrial areas surrounding the Slauson Station. This zone allows uses focused on fostering a more pedestrian-oriented setting with active uses to encourage walking and bicycling. The MU-T zone prioritizes multi-modal transportation, which allows for a healthier environment for community members by making it accessible, safe, and easy to navigate. This zone would implement the MU General Plan Land Use Designation consistent with descriptions above.

#### 2.5.3.2 Residential Zone

The general purpose of the Residential Zones in the FFTOD Specific Plan Area is to support a variety of housing options, types, configurations, and affordability levels in proximity to transit.

**Residential Low-Medium 1 Zone:** The Residential Low-Medium 1 (RLM-1) Zone is intended to maintain the existing residential neighborhood while supporting a broader range of housing types and configurations, such as single-family residential, townhomes, duplexes, and triplexes. The RLM-1 zone provides individuals and families housing options that are more accommodating for their lifestyle in proximity to transit and services. This zone would implement the Residential 18 (H18) General Plan Land Use Designation, which allows 0 to 18 du/net acre for residential uses.

**Residential Low-Medium 2 Zone:** The Residential Low-Medium 2 (RLM-2) Zone is intended to maintain existing residential neighborhoods while supporting a broader range of housing types and configurations, such as townhomes, duplexes, triplexes, apartments, and multifamily residential. The RLM-2 Zone provides for individuals and families affordable options that are more accommodating for their lifestyle in proximity to transit and services. This zone would implement the Residential 30 (H30) General Plan Land Use Designation, which allows 20 to 30 du/net acre for residential uses.

**Residential Medium Zone:** The Residential Medium (RM) Zone is intended to apply to existing residential neighborhoods where the purpose is to encourage medium density residential near transit. The RM Zone allows multifamily residential homes such as apartments and townhomes. This zone would implement the Residential 50 General Plan Land Use Designation; which allows 20 to 50 du/net acre for residential uses.

**Residential Slauson Station Zone:** The Residential High (RH) Zone is intended to encourage the establishment of high density residential near transit in existing neighborhoods. The RH Zone seeks to provide a wider range of housing types and densities, supporting transit oriented development. This approach encourages a mixture of housing types, which achieves equitable and sustainable development and allows all community members to thrive in a resilient environment. This zone would implement the Residential 100 General Plan Land Use Designation; which allows 50 to 100 du/net acre for residential uses.

The residential zone development standards would include a maximum density ranging from 18 du/ac to 100 du/ac; a maximum building height ranging from 36 feet to 65 feet, and a minimum building setback of 5 feet for most street frontages (note: Florence Avenue has a minimum building setback of 3 feet).

#### 2.5.3.3 Industrial Mix Zone

The general purpose of the Industrial Mix (IX) Zone is to support a transition to less intensive employment-focused uses near transit oriented development and improve land use adjacencies to residential areas. This zone also helps to implement the Green Zones Ordinance via Los Angeles County Municipal Code Chapter 22.128 (Storage Enclosure Requirements for Recycling and Solid Waste).

**Industrial Mix Zone:** The IX Zone is intended to maintain neighborhood-appropriate light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for mixed residential and employment areas. The IX Zone allows the creation of transition areas between employment uses and residential areas to encourage less noxious uses (such as commercial) to abut homes, thereby supporting the goals of the Los Angeles County Green Zones Program and Ordinance. The zone allows uses focused on light industrial, neighborhood-serving commercial and office. The IX Zone would encourage a cleaner environment through lower-emission and lower intensity uses where industrial businesses and residents can coexist. This zone would implement the Light Industrial General Plan Land Use Designation.

The IX Zone development standards would include a 1.0 maximum floor area ratio; minimum lot size of 4,000 square feet (no maximum lot coverage); a maximum building height of 36 feet, and a minimum building setback of 2 feet for most street frontages.

### 2.5.4 Supplemental Development Standards

In addition to the allowed uses and development standards of the base zones described above, the FFTOD Specific Plan provides general development standards related to density, intensity, height regulations, setbacks, and stepbacks to promote urban design and form that supports transit oriented development and creates transitions between neighborhood types. The FFTOD Specific Plan also includes active ground floor design standards for mixed use corridors in the FFTOD Specific Plan Area to support a walkable, pedestrian character that promotes walking within the community. These streetscape improvements also provide for shading, outdoor dining and activities, public art, pedestrian and exterior lighting, fencing, and architectural and landscaping requirements including street trees.

To address the community's feedback to increase publicly accessible open space, the FFTOD Specific Plan also proposes open space standards for all residential and mixed use developments. Each residential or mixed use development is required to provide the minimum area of common and private open space based on type within each development as well as publicly accessible open spaces and signage. Projects over 80,000 gross square feet are required to provide publicly accessible open space as a percentage of the total development.

### 2.5.5 Base Zone Modifications

Los Angeles County will also rescind the existing Florence-Firestone Community Standards District zoning overlay currently within the Los Angeles County Zoning Code and incorporate any applicable standards into the FFTOD Specific Plan. These existing standards would continue to help improve the appearance of the community, promote the maintenance and reuse of structures

and properties, and implement the goals and policies of the FFCP in a manner that protects the health, safety, and general welfare of the community. The standards would also help to improve the compatibility between residential and neighboring industrial uses, encourage pedestrian activity, and encourage business growth near transit.

## 2.5.6 Buildout of the Proposed Specific Plan

The FFTOD Specific Plan would provide transit-oriented development opportunities for infill and redevelopment to serve as catalyst to revitalize the area. The buildout of the FFTOD Specific Plan Area would result in a net increase of approximately 42,518 additional people associated with 12,110 new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area.

## 2.5.7 Proposed Mobility Improvements

The FFTOD Specific Plan would provide recommendations for mobility infrastructure improvements to support transit, pedestrian, and bicycle mobility, as well as programmatic improvements to support complete streets and improve parking conditions.

### 2.5.7.1 Transit Improvements

The FFTOD Specific Plan Area is currently served by an extensive network of public transportation. The FFTOD Specific Plan proposes the installation of transit amenities (e.g., shelters, benches, lighting, transit information, trash bins, bicycle racks, and public art) at bus stops and transit stations to improve the transit experience. These amenities would be installed at bus stops and transit stations throughout the FFTOD Specific Plan Area in coordination with Metro.

### 2.5.7.2 Pedestrian Circulation

The FFTOD Specific Plan proposes to enhance the walkability, pedestrian comfort, mobility and access, and safety of the area for people walking. The FFTOD Specific Plan would implement the Los Angeles County TOD Toolkit (2019) and proposes to enhance the "frontage zone" portion of sidewalks in specific locations. The frontage zone is the portion of private property that abuts the public right-of-way sidewalk. Together, the frontage zone and public sidewalk create the public realm. While sidewalk requirements—including locations and widths—are regulated per Title 22 Chapter 21.24.050 (Highways), which establishes right-of-way and roadway width requirements with cross-section diagrams specifying sidewalk dimensions, the FFTOD Specific Plan establishes required private development street setbacks that would expand the public realm and the perceived width of the sidewalk through an enhanced the frontage zone. In the "furniture zone" of the public sidewalk, the FFTOD Specific Plan requires the installation of street trees in specific zones. These requirements—coupled with pedestrian design standards (e.g., building location, entry orientation, ground floor design)—would help to create a comfortable and attractive sidewalk environment for pedestrians along mixed-use and commercial corridors as property improvements or redevelopment occurs. The County is currently exploring ways to provide more sustainable operation and maintenance funding for pedestrian-scale lighting. Once a secure source of operation and maintenance funding is identified, then pedestrian-scale lighting can be implemented at the following proposed locations.

In addition, consistent with the TOD Toolkit, the FFTOD Specific Plan proposes recommendations to widen sidewalks through curb ramps and curb extensions (where feasible) and implement pedestrian-oriented intersection improvements at key locations within the 0.5-mile transit-oriented development areas surrounding the LA Metro A (Blue) Line Slauson, Florence, and Firestone Stations. Proposed intersection improvements include adding/restriping high visibility crosswalks at existing marked crossings, adding curb ramps and truncated domes at existing marked crossings, adding pedestrian-activated flashing beacons at existing marked mid-block crossings, and adding high-visibility crosswalks at unmarked crossings at intersections and at new mid-block crossing locations. A list of the pedestrian improvements proposed by the FFTOD Specific Plan is provided in Table 2-2. The proposed pedestrian enhancements are shown in Figure 2-7.

**Table 2-2: Pedestrian Improvement Recommendations**

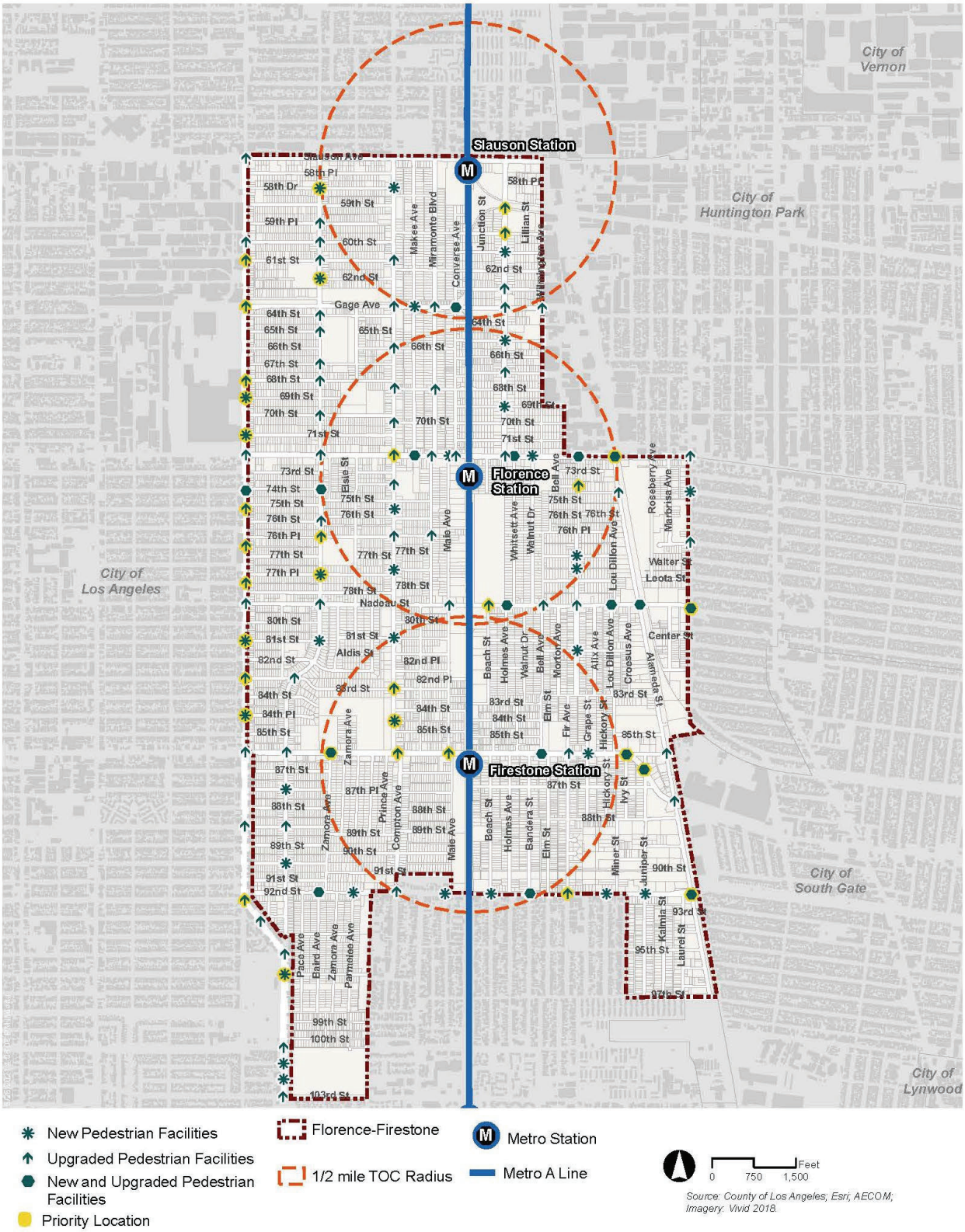
| Location | Crossing Improvement |
|---|---|
| Gage Avenue & Central Avenue | Upgrade Facilities |
| Gage Avenue & Compton Avenue | Upgrade Facilities |
| Gage Avenue & Makee Avenue | Add New Facilities |
| Gage Avenue & Miramonte Boulevard | Upgrade Facilities |
| Gage Avenue & Converse Avenue | Upgrade Facilities, Add New Facilities |
| Gage Avenue & Holmes Avenue | Upgrade Facilities |
| Gage Avenue & Wilmington Avenue | Upgrade Facilities |
| Florence Avenue & Central Avenue | Upgrade Facilities |
| Florence Avenue & Hooper Avenue | Upgrade Facilities |
| Florence Avenue & Compton Avenue | Upgrade Facilities |
| Florence Avenue & Makee Avenue | Upgrade Facilities, Add New Facilities |
| Florence Avenue & Miramonte Boulevard | Upgrade Facilities |
| Florence Avenue & Maie Avenue | Add New Facilities |
| Florence Avenue & Converse Avenue | Upgrade Facilities |
| Florence Avenue & Whitsett Avenue | Upgrade Facilities, Add New Facilities |
| Florence Avenue & Walnut Drive | Add New Facilities |
| Florence Avenue & Crockett Boulevard | Upgrade Facilities, Add New Facilities |
| Florence Avenue & Alameda Street | Upgrade Facilities, Add New Facilities |
| Florence Avenue & Santa Fe Avenue | Upgrade Facilities |
| Nadeau Street & Central Avenue | Upgrade Facilities |
| Nadeau Street & Hooper Avenue | Upgrade Facilities |
| Nadeau Street & Maie Avenue | Upgrade Facilities |
| Nadeau Street & Beach Street | Upgrade Facilities |
| Nadeau Street & Holmes Avenue | Upgrade Facilities, Add New Facilities |
| Nadeau Street & Bell Avenue | Upgrade Facilities |
| Nadeau Street & Crockett Boulevard | Upgrade Facilities |
| Nadeau Street & Lou Dillon Avenue | Upgrade Facilities, Add New Facilities |
| Nadeau Street & Alameda Street | Upgrade Facilities, Add New Facilities |
| Nadeau Street & Santa Fe/Broadway | Upgrade Facilities, Add New Facilities |

| Location | Crossing Improvement |
|---|---|
| Firestone Boulevard at Central Avenue | Upgrade Facilities |
| Firestone Boulevard at Hooper Avenue | Upgrade Facilities |
| Firestone Boulevard at Zamora Avenue | Upgrade Facilities, Add New Facilities |
| Firestone Boulevard at Compton Avenue | Upgrade Facilities |
| Firestone Boulevard at Maie Avenue | Upgrade Facilities |
| Firestone Boulevard at Bell Avenue | Upgrade Facilities, Add New Facilities |
| Firestone Boulevard at Fir Avenue | Upgrade Facilities |
| Firestone Boulevard at Grape Street | Add New Facilities |
| Firestone Boulevard at Ivy Street | Upgrade Facilities, Add New Facilities |
| Firestone Boulevard at Juniper Street | Upgrade Facilities, Add New Facilities |
| Firestone Boulevard at Alameda Street | Upgrade Facilities |
| 92nd Avenue at Central Avenue | Upgrade Facilities |
| 92nd Avenue at Baird Avenue | Upgrade Facilities, Add New Facilities |
| 92nd Avenue at Parmalee Avenue | Add New Facilities |
| 92nd Avenue at Compton Avenue | Upgrade Facilities |
| 92nd Avenue at Maie Avenue (E Leg) | Add New Facilities |
| 92nd Avenue at Bandera Street | Upgrade Facilities, Add New Facilities |
| 92nd Avenue at Fir/Anzac Avenue | Upgrade Facilities |
| 92nd Avenue at Hickory Street | Add New Facilities |
| 92nd Avenue at Juniper Street | Add New Facilities |
| 92nd Avenue at Alameda Street | Upgrade Facilities, Add New Facilities |
| 92nd Avenue at Beach Street | Add New Facilities |
| Central Avenue at Slauson Avenue | Upgrade Facilities |
| Central Avenue at 60th Street | Upgrade Facilities |
| Central Avenue at 61st Street | Upgrade Facilities |
| Central Avenue at 68th Street | Upgrade Facilities |
| Central Avenue at 69th Street | Add New Facilities |
| Central Avenue at 71st Street | Add New Facilities |
| Central Avenue at 74th Street | Upgrade Facilities, Add New Facilities |
| Central Avenue at 75th Street | Upgrade Facilities |
| Central Avenue at 76th Place | Upgrade Facilities |
| Central Avenue at 78th Street (N Leg) | Upgrade Facilities |
| Central Avenue at 81st Street | Add New Facilities |
| Central Avenue at 83rd Street | Upgrade Facilities |
| Central Avenue at 84th Place | Add New Facilities |
| Central Avenue at 88th Place | Upgrade Facilities |
| Central Avenue at 93rd Street | Upgrade Facilities |
| Central Avenue at 95th Street/Hooper Avenue | Upgrade Facilities |
| Central Avenue at 96th Street/Colden Avenue | Add New Facilities |
| Central Avenue at Century Boulevard | Upgrade Facilities |

| Location | Crossing Improvement |
|---|---|
| Central Avenue at 101st Street | Add New Facilities |
| Central Avenue at 102nd Street | Add New Facilities |
| Central Avenue at 103rd Street | Upgrade Facilities |
| Hooper Avenue at 58th Dr | Add New Facilities |
| Hooper Avenue at 59th Place | Upgrade Facilities |
| Hooper Avenue at 60th Street | Upgrade Facilities |
| Hooper Avenue at 61st Street | Upgrade Facilities |
| Hooper Avenue at 62nd Street | Add New Facilities |
| Hooper Avenue at 64th Street | Upgrade Facilities |
| Hooper Avenue at 65th Street | Upgrade Facilities |
| Hooper Avenue at 67th Street | Upgrade Facilities |
| Hooper Avenue at 68th Street | Upgrade Facilities |
| Hooper Avenue at 70th Street | Upgrade Facilities |
| Hooper Avenue at 74th Street | Upgrade Facilities, Add New Facilities |
| Hooper Avenue at 76th Street (N Leg) | Upgrade Facilities |
| Hooper Avenue at 76th Place | Upgrade Facilities |
| Hooper Avenue at 77th Place | Add New Facilities |
| Hooper Avenue at 81st Street | Add New Facilities |
| Hooper Avenue at 83rd Street | Upgrade Facilities |
| Hooper Avenue at 87th Place | Add New Facilities |
| Hooper Avenue at 88th Place | Upgrade Facilities |
| Hooper Avenue at 90th Street | Add New Facilities |
| Compton Avenue at 58th Dr (S Leg) | Add New Facilities |
| Compton Avenue at 61st Street | Upgrade Facilities |
| Compton Avenue at 66th Street | Upgrade Facilities |
| Compton Avenue at 68th Street | Upgrade Facilities |
| Compton Avenue at 70th Street | Upgrade Facilities |
| Compton Avenue at 74th Street | Upgrade Facilities |
| Compton Avenue at between 75th Street and 76th Street | Add New Midblock Crossing |
| Compton Avenue at 76th Place | Upgrade Facilities |
| Compton Avenue at 77th Place (N leg) | Add New Facilities |
| Compton Avenue at 81st Street | Add New Facilities |
| Compton Avenue at 83rd Street | Upgrade Facilities |
| Compton Avenue at between 84th Street and 85th Street | Add New Midblock Crossing |
| Miramonte Blvd at 68th Street | Upgrade Facilities |
| Miramonte Blvd at 76th Place | Upgrade Facilities |
| Holmes Avenue at Randolph Street | Upgrade Facilities |
| Holmes Avenue at 60th Street | Upgrade Facilities |
| Holmes Avenue at 61st Street | Add New Facilities |
| Holmes Avenue at 63rd Street | Upgrade Facilities |

| Location | Crossing Improvement |
|---|---|
| Holmes Avenue at 65th Street | Add New Facilities |
| Holmes Avenue at 67th Street | Upgrade Facilities |
| Holmes Avenue at 69th Street | Add New Facilities |
| Holmes Avenue at Florence Avenue | Upgrade Facilities |
| Crockett Boulevard at 74th Street | Upgrade Facilities |
| Crockett Boulevard at 77th Street | Add New Facilities |
| Crockett Boulevard at 78th Street | Add New Facilities |
| Crockett Boulevard at Nadeau Street | Upgrade Facilities |
| Crockett Boulevard at 81st Street | Add New Facilities |
| Alameda Street at 74th Street | Upgrade Facilities |
| Alameda Street at Manchester Avenue | Upgrade Facilities |
| Santa Fe Avenue at Florence Avenue | Upgrade Facilities |
| Santa Fe Avenue at California Street | Add New Facilities |
| Santa Fe Avenue at Hope Street/Walnut Terrace | Upgrade Facilities |

## Figure 2-7: Proposed Pedestrian Enhancements



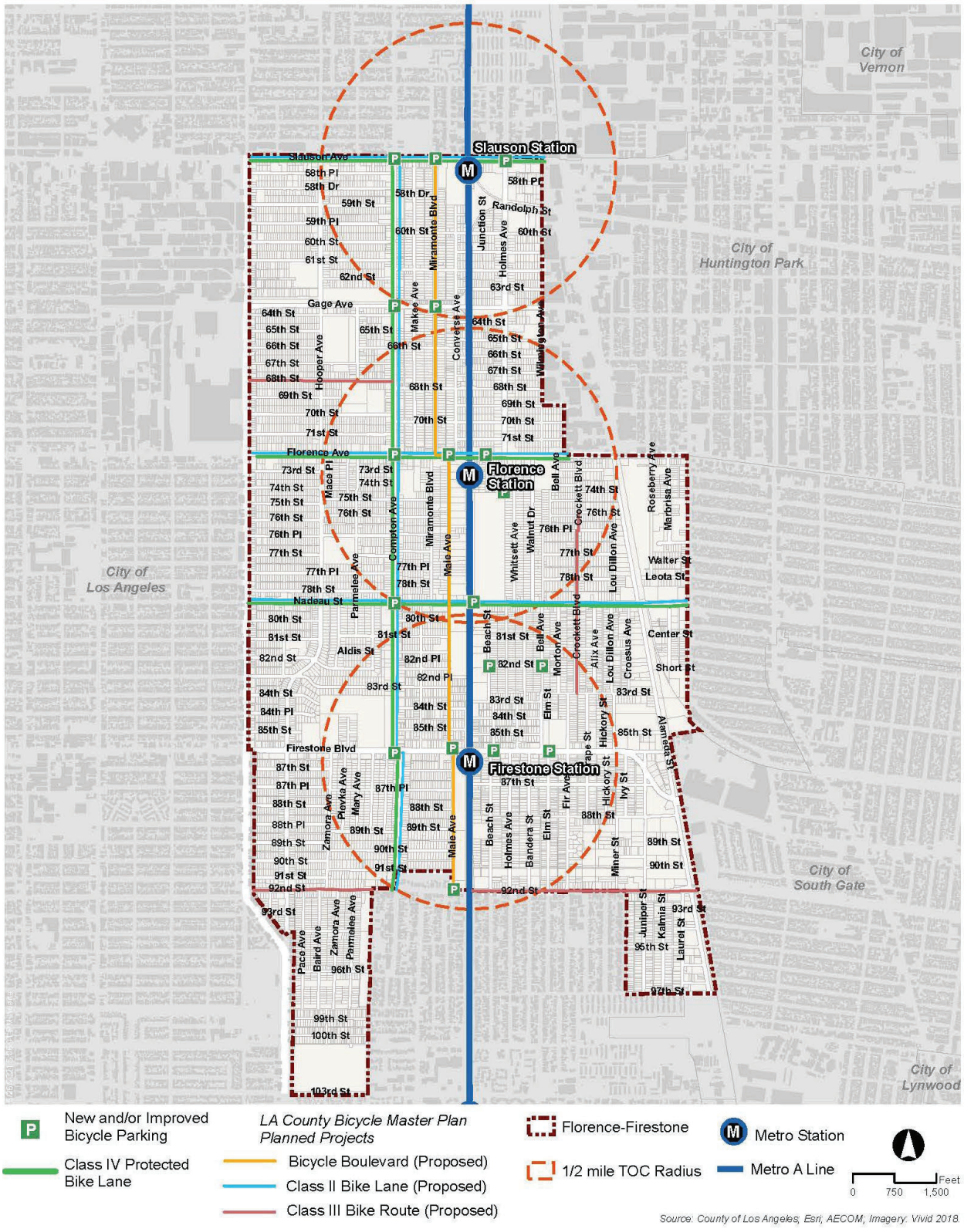
### 2.5.7.3 Bicycle Circulation

Existing bicycle facilities and infrastructure in the FFTOD Specific Plan Area are limited to Class III bicycle routes and bicycle boulevards as well as Class II bicycle lanes. As such, the FFTOD Specific Plan proposes bicycle facility improvements adding Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street as well as inclusion of bicycle parking (inclusion of bicycle racks, lockers, and corrals) at key public locations to serve existing uses. A list of the location and type of bicycle facilities proposed by the FFTOD Specific Plan is provided in Table 2-3. The proposed bicycle enhancements are shown in Figure 2-8.

**Table 2-3: Location and Type of Recommended Bicycle Enhancements**

| Location | Improvement |
|---|---|
| **Compton Avenue** | Class IV Protected Bike Lane |
| **Florence Avenue** | Class IV Protected Bike Lane |
| **Nadeau Street** | Class IV Protected Bike Lane |
| **Slauson Avenue** | Class II Bike Lane (Bicycle Master Plan) |
| **Compton Avenue** | Class II Bike Lane (Bicycle Master Plan) |
| **Florence Avenue** | Class II Bike Lane (Bicycle Master Plan) |
| **Nadeau Street** | Class II Bike Lane (Bicycle Master Plan) |
| **68th Street (Central Avenue to Compton Avenue)** | Class III Bike Lane (Bicycle Master Plan) |
| **Crockett Boulevard (76th Place to 83rd Place)** | Class III Bike Lane (Bicycle Master Plan) |
| **92nd Street** | Class III Bike Lane (Bicycle Master Plan) |
| **Miramonte Boulevard (Slauson Avenue to Florence Avenue)** | Bicycle Boulevard (Bicycle Master Plan) |
| **Maie Avenue (Florence Avenue to 92nd Street)** | Bicycle Boulevard (Bicycle Master Plan) |
| **82nd Street & Beach Street** | Bicycle Parking |
| **82nd Street & Bell Avenue** | Bicycle Parking |
| **Slauson Avenue & Compton Avenue** | Bicycle Parking |
| **Slauson Avenue & Miramonte Boulevard** | Bicycle Parking |
| **Slauson Avenue & Holmes Avenue** | Bicycle Parking |
| **Gage Avenue & Compton Avenue** | Bicycle Parking |
| **Gage Avenue & Miramonte Boulevard** | Bicycle Parking |
| **Florence Avenue & Compton Avenue** | Bicycle Parking |
| **Florence Avenue & Maie Avenue** | Bicycle Parking |
| **Florence Avenue & Beach Street** | Bicycle Parking |
| **Beach Street & Holmes Avenue** | Bicycle Parking |
| **Nadeau Street & Compton Avenue** | Bicycle Parking |
| **Nadeau Street & Graham Avenue** | Bicycle Parking |
| **Firestone Boulevard & Compton Avenue** | Bicycle Parking |
| **Firestone Boulevard & Maie Avenue** | Bicycle Parking |
| **Firestone Boulevard & Beach Street** | Bicycle Parking |
| **Firestone Boulevard & Elm Street** | Bicycle Parking |
| **92nd Street & Maie Avenue** | Bicycle Parking |

## Figure 2-8: Proposed Bicycle Enhancements



### 2.5.7.4 Complete Streets

"Complete Streets" refers to the idea that streets should be usable and comfortable for people traveling by all modes, not only vehicles. The existing street system would be maintained in its current configuration. However, the FFTOD Specific Plan proposes some changes designed to improve walkability, bicycle use, and transit use. Recommended strategies include the following:

- Signage and wayfinding to provide improved information on distances and directions for people using any mode of travel
- Traffic calming to reduce speeds and improve safety for all roadway users
- Transportation Demand Management program to manage demand for travel rather than increasing supply or capacity of transportation systems

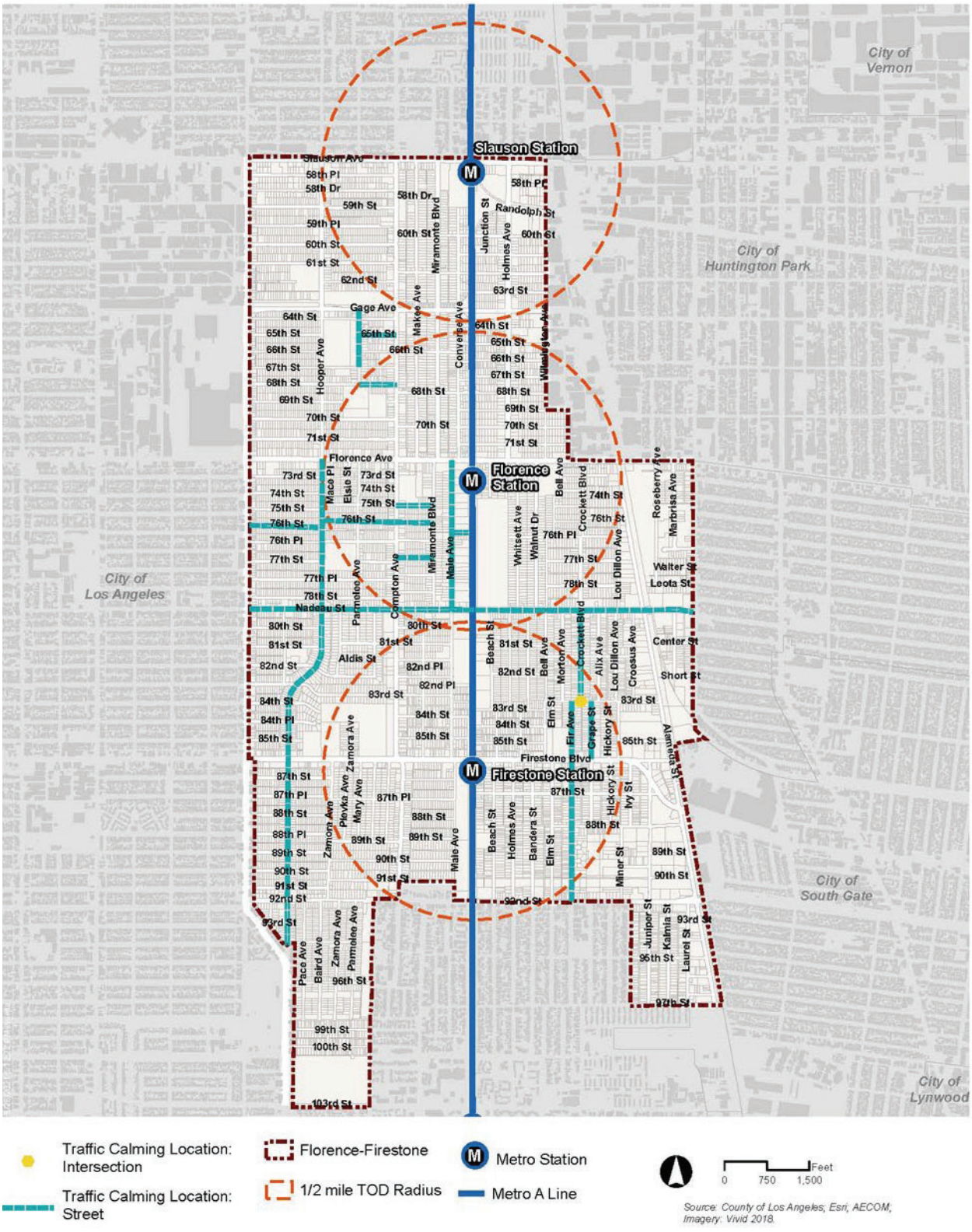
Signage and Wayfinding. Through a separate Los Angeles County project, installation of new signage and wayfinding is anticipated in the FFTOD Specific Plan Area in the near future. To support future travel needs and a higher number of people walking, bicycling, and riding transit in the community, this strategy should be revisited periodically to assess whether existing signage is sufficient to meet the needs of all users including pedestrians (who may prefer time estimates to destinations instead of distance estimates), bicyclists (who may prefer signs with directions to continue on designated bike facilities), and transit riders (who may also seek information about transit transfer opportunities).

Traffic Calming. Traffic calming measures such as curb extensions, speed bumps, raised crosswalks, traffic circles, and roundabouts help slow the speed of traffic, improve the pedestrian environment, and minimize safety concerns associated with cut-through traffic. The FFTOD Specific Plan proposes several specific locations that are well-suited for traffic calming measures feasibility studies based on their existing width; local roadway designation; and, in some cases, direct requests from residents in the Florence-Firestone community. These locations include (Figure 2-9):

- 65th Street between Parmelee Avenue and Compton Avenue
- 68th Street between Parmelee Avenue and Compton Avenue
- 75th Street between Compton Avenue and Miramonte Boulevard
- 76th Street
- 77th Street between Compton Avenue and Miramonte Boulevard
- 83rd Street and Crockett Boulevard
- Crockett Boulevard south of Nadeau Street
- Fir Avenue south of 83rd Street
- Grape Street between 83rd Street and Firestone Boulevard
- Maie Avenue north of Nadeau Street
- Nadeau Street
- Parmelee Avenue between Gage Avenue and 67th Street
- Hooper Avenue south of Florence Avenue

Further analysis and a feasibility study will be needed to determine the traffic calming approach most appropriate at each of these locations, and should take into account feasibility, current design standards, and any additional information (speed surveys, updated collision history) that may become available.

## Figure 2-9: Proposed Traffic Calming Improvements



#### 2.5.7.5 Other Network Improvements

In addition to the described network improvements above, the FFTOD Specific Plan proposes three major improvements to improve access to the Metro A Line Stations in the FFTOD Specific Plan Area and to Roosevelt Park, with a focus on pedestrian accessibility.

Southern Slauson Station Access Point. Formalizing the informal pedestrian pathway leading from 60th Street to Slauson Avenue would connect the neighborhoods south of the Slauson Station to the station entrance. This pathway is already used as an informal access point to the station and provides a more direct path of travel to the station entrance. Formalizing the path would require acquisition of the rail right-of-way underneath the Metro A (Blue) Line, coordination with Metro, and coordination with Public Works.

Pedestrian Bridge at 76th Street. Replacement and reconstruction of the pedestrian bridge connecting the western side of the community at East 76th Street to Roosevelt Park at Graham Avenue would improve neighborhood pedestrian connectivity, access to community assets, and access to transit. In addition, the reconstruction of this bridge would create a pleasing visual marker for the community by incorporating public art, which would reinforce locally valued viewsheds at the top of the bridge.

Florence Station and Firestone Station Access. Increasing the ease of reaching a transit station is an important improvement that should be made for each of the stations in the FFTOD Specific Plan Area. The A (Blue) Line Stations in the FFTOD Specific Plan Area each only have one access point. The Slauson Station will see expanded access as the West Santa Ana Branch line is implemented (under a separate project), but the Florence and Firestone stations would also benefit from improved access. At the Florence Station, the community suggested creation of a second at-grade access point at the southern end of the station to minimize out-of-direction travel to access the platform. At the Firestone Station, additional amenities under the elevated rail line would improve the pedestrian and transit rider experience. These amenities could include:

- Better lighting under the rail overcrossing, near the station entrance, and along the blocks adjacent to the station
- Beautification through murals, art, and landscaping
- Additional Metro communication and emergency call boxes
- Additional street furniture
- Additional wayfinding, signage, and branding extending under the overcrossing to the western side of the rail tracks

### 2.5.8 Proposed Infrastructure Improvements

#### 2.5.8.1 Water

The FFTOD Specific Plan proposes improvements to the existing water system to accommodate buildout. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under buildout of the FFTOD Specific Plan. However, increases in residential density would result in increased potential water usage including potable water and fire prevention demand. To service this, the following needs have been identified if increased density develop at the following locations:

- All lines servicing fire hydrants must be at least a nominal 6 inches to supply minimum fire flow requirements per Los Angeles County Municipal Code Section 20.16.060
- High-density residential buildout (Residential Slauson Station Zone) of five stories north of 62nd Street and 63rd Street west of Holmes Avenue may require upgrade of the existing 4-inch cast iron. Recommended replacing 4-inch main with 10-inch polyvinyl chloride (PVC) main along 62nd and 8-inch PVC main along 63rd.
- Medium-density residential buildout (RM Zone) east of Converse Avenue, south of 68th Street, west of Wilmington Avenue, and north of Florence Avenue may require upgrade of 4-inch cast iron along 69th Street, 70th Street, and 71st Street. Recommend replacing all 4-inch mains in this area with 8-inch PVC mains.

Developers of mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location would be required to provide analysis to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act. The Golden State Water Company Florence-Graham District Urban Water Management Plan was last updated in 2015 and should be consulted for all water system upgrade considerations.

#### 2.5.8.2 Sewer Service

The FFTOD Specific Plan proposes improvements to the existing sewer system to accommodate buildout. Existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition. However, the following locations are exceptions that may require upgrading based on the level of density/intensity realized in the vicinity.

- *Tributary Area 5*: A 10-inch main emptying into a trunk line at the Maie Avenue/Nadeau Street intersection may warrant further study. The main collects from 50 acres of light residential and light manufacturing on the east side of Converse Avenue and Maie Avenue, from north of E 60th Street to Nadeau Avenue. Depending on density/intensity realized in the geography between 60th Street and Nadeau Avenue, east of Converse Avenue and Maie Avenue, the main may need to be upgraded to 15 inches.
- *Tributary Area 6*: An 8-inch main running toward the city of Huntington to the east at Slauson Avenue may warrant further study. The main collects from 49 acres of Unlimited Residence and Heavy Manufacturing along Holmes Avenue from Gage Street to Slauson Avenue; then east to west from South Pacific railroad lines to Wilmington Avenue. It comprises the northeast corner of the FFTOD Specific Plan Area and a majority of the Slauson TOD Area. This portion of the FFTOD Specific Plan is planned for high-intensity mixed use and medium-density residential development replacing existing industrial and primarily single-family uses, respectively. The 8-inch main may be insufficient for current conditions due to the significant presence of heavy manufacturing in the area; upgrade to 10 inches is recommended. Depending on density/intensity realized from future development, the main may need to be upgraded to 15 inches.
- *Tributary Area 7*: A 10-inch main flowing south under Holmes Avenue from Gage Avenue to a Trunk line at Florence Avenue may warrant further study. The main runs between South Pacific railroad to the east and Wilmington Avenue to the west. The 10-inch main services 59

acres of mostly Unlimited Residence with some Light Manufacturing, Neighborhood Business, and Mixed-Use Development; this area is planned for low-medium (RLM-2) to medium density (RM) residential. Depending on density/intensity realized in the geography, the main may need to be upgraded to 15 inches.

- *Tributary Area 9*: An 8-inch main under Parmelee Avenue that flows to the west under E 78th Street and empties into a trunk under Hooper Avenue may warrant further study. The main services about 34 acres south of Florence Avenue, east of Parmelee Avenue and North of E 78th Street; this area is composed of Limited Density Multiple Residence, General Commerce, and Mixed-Use Development. Depending on density/intensity realized in the geography, the main may need to be upgraded to 10 inches.

Parcel developers would be required to consult with Los Angeles County and the Consolidated Sewer Maintenance District regarding future sewer facilities or upgrade considerations; the Consolidated Sewer Maintenance District would evaluate all development that will occur and conduct its own analysis of changes to the service trunk and necessary sewer infrastructure upgrades. New sewer laterals would be required for new buildings.

#### 2.5.8.3 Stormwater Service

Buildout of the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system because the area is completely developed and projects would be required to incorporate low-impact development practices per the Regional Water Quality Control Board requirements and Los Angeles County Public Works Green Infrastructure Guidelines. However, based on existing infrastructure in the FFTOD Specific Plan Area, the FFTOD Specific Plan proposes that the areas served by the Glen Avenue Drain improve area runoff peak flow characteristics through generalized implementation of retention-based stormwater quality control measures within the public right-of-way and in any new developments. The FFTOD Specific Plan includes a potential for upsizing segments of the underground system to handle 50 percent greater flow.

#### 2.5.8.4 Electrical Service

Electricity in the community is provided by Southern California Edison (SCE), a private franchise utility company and subsidiary of Sempra Energy. All standards, development requirements, and improvement strategies are set directly by SCE, with oversight by the California Public Utilities Commission. New development or redevelopments would be responsible for upgrades and undergrounding as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and the California Public Utilities Commission would determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

Developers would be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.

## 2.6 INTENDED USES OF THE EIR

This Draft Environmental Impact Report (EIR) examines the environmental impacts of the project and addresses various actions by Los Angeles County and others to adopt and implement the project. The intent of this Draft EIR is to evaluate the environmental impacts of the project, thereby enabling Los Angeles County, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. The anticipated approvals by jurisdiction required for this project to be implemented may include—but are not limited to—the following:

- Los Angeles County
  - Adoption of the proposed Florence-Firestone TOD Specific Plan General Plan amendment to update the land use designations of parcels to support TOD policies, apply newly adopted land use designations for mixed use development, and maintaining consistency between the General Plan and the Specific Plan
  - Amendment to Los Angeles County's Code of Ordinances Title 22 Planning and Zoning (Zoning Ordinance) to repeal Chapter 22.324 Florence-Firestone Community Standards District; adopt the zoning provisions of the proposed Specific Plan (Chapter 4 Florence-Firestone Zones and Development Standards) into a new section within Title 22 Chapter 22.420; and amend the Zoning Map to change zones of identified parcels to be consistent with the Specific Plan
  - Amend the Florence-Firestone Community Plan to add a limited set of new policies that increase the TOD direction and support the Specific Plan
- South Coast Air Quality Management District
  - Issuance of point source emissions/construction permits
- Los Angeles Regional Water Quality Control Board
  - Issuance of a National Pollutant Discharge Elimination System permit for future construction activities
- California Department of Transportation
  - Issuance of encroachment permits for roadway improvements within California Department of Transportation rights-of-way
- Metro
  - Approval of development under Metro's jurisdiction

## 2.7 REFERENCES

Los Angeles County. 2014. Los Angeles County Housing Element, 2014-2021. Available at https://planning.lacounty.gov/assets/upl/project/housing_element.pdf; accessed on April 2, 2021.

Los Angeles County. 2015. Los Angeles County General Plan 2035. Adopted October 15.

Los Angeles County Department of Regional Planning (DRP). 2020a. Florence-Firestone Equity and Mobility Study Final for the Florence-Firestone TOD Specific Plan County of Los

Angeles. October. Available at https://planning.lacounty.gov/assets/upl/project/fftod-mobility-equity-study-oct2020.pdf; accessed on June 7, 2021.

DRP. 2020b. Florence-Firestone Community Atlas Revised Draft for the Florence-Firestone TOD Specific Plan County of Los Angeles. October. Available at https://planning.lacounty.gov/assets/upl/project/fftod-community-atlas-sept2020.pdf; accessed on June 7, 2021.

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# 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

This Draft Environmental Impact Report (EIR) has been prepared in accordance with California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), and Los Angeles County Environmental Document Reporting Procedures and Guidelines. This Draft EIR evaluates the potential environmental impacts associated with the construction and operation of future development that is consistent with the Florence Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan). This Draft EIR is intended to serve as an informational document for the public agency decision-makers and the public regarding the project.

## 3.0.1 Scope of the Environmental Impacts

In accordance with Section 15126 of the CEQA Guidelines, Chapter 3 provides an analysis of the direct and indirect project and cumulative environmental effects of future development that complies with the proposed FFTOD Specific Plan with respect to existing conditions at the time the Notice of Preparation (NOP) was published (Appendix A). The determination of whether an impact is significant has been made based on the physical conditions established at the time the NOP was published (CEQA Guidelines, Section 15125[a]). The proposed FFTOD Specific Plan is evaluated in this Draft EIR at a programmatic level, in accordance with CEQA Guidelines, Section 15168. As previously stated in Chapter 1, the Draft EIR analysis is not intended to focus on the site-specific construction and operation details of each future development within the FFTOD Specific Plan Area. Rather, this Draft EIR serves as a first-tier environmental document that focuses on the effects of implementing the overall FFTOD Specific Plan to provide a comprehensive document that addresses environmental concerns of the overall effects of buildout of the proposed FFTOD Specific Plan. The following environmental resources are assessed in this chapter in accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist Form:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation

- Tribal Cultural Resources
- Utilities/Services

The environmental issue areas where impacts were found to not be significant are described in Chapter 5 (Other CEQA Considerations). Chapter 5 addresses the CEQA Guidelines Appendix G and the Los Angeles County Environmental Checklist Form questions for each of the environmental topic areas where the FFTOD Specific Plan was determined in the Initial Study to result in either a less-than-significant impact or no impact.

## 3.0.2 Approach to Environmental Analysis

Section 3.1 through Section 3.16 of this Draft EIR present analysis of the environmental setting, regulatory framework, and potential impacts related to construction and operation of future development in accordance with the proposed FFTOD Specific Plan. The environmental evaluation includes a project analysis and a cumulative analysis. If potential significant impacts are identified, feasible programmatic mitigation measures are recommended. The analysis also includes a level of impact after the implementation of programmatic mitigation measures.

The project analysis evaluates proposed updates to land use, urban design, and mobility within the Slauson, Florence, and Firestone stations' TOD areas. The Draft EIR analyzes the General Plan Land Use amendments and updated zones, buildout of the proposed FFTOD Specific Plan, and proposed circulation, streetscape, and infrastructure system improvements.

The FFTOD Specific Plan proposes the following nine new zones: Industrial Flex (IF), Mixed-Use 1 (MU-1), Mixed-Use 2 (MU-2), Mixed-Use 3 (MU-3), Mixed-Use Transit (MU-T), Residential Low-Medium 1 (RLM-1), Residential Low-Medium 2 (RLM-2), Residential Medium (RM), and Residential Slauson Station (RSS). New development standards for zones would also include setback and parking standards to address mobility issues in the community. The project would also update zoning for sites identified for the Regional Housing Needs Allocation by the Housing Element Update. Buildout of the FFTOD Specific Plan would result in 12,110 additional residential units that would house approximately 42,518 additional people and approximately 1,183,013 square feet of nonresidential uses that would generate approximately 2,734 jobs. The analysis also includes the various design standards that are included in the proposed FFTOD Specific Plan. A detailed discussion of the proposed project is provided in Chapter 2, Project Description.

## 3.0.3 Standard Existing Regulations, Requirements, and Procedures Applicable to the Project

This EIR is a program EIR prepared in accordance with CEQA Guidelines Section 15168. Although the legally required contents of a program EIR are the same as for a project EIR, program EIRs are typically more conceptual than project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, later activities in the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, many later activities may be within the program EIR's scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a lead agency relies on a program EIR for a later activity, it must incorporate feasible mitigation measures and alternatives from the program EIR into the later activities (Guidelines § 15168[c][3]). If a later activity would have effects outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis.

The mitigation measures described in this document are for a program-level decision (referred to as "programmatic mitigation measures") and are intended to be used to avoid, minimize, or reduce potentially significant environmental impacts of future development projects pursuant to implementation of the FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from this EIR. As part of these second-tier environmental reviews, the individual project applicants, in coordination with Los Angeles County, will use the programmatic mitigation measures identified in this program document as starting points to determine their applicability to a specific project and to develop additional or more specific mitigation measures (as necessary) for significant adverse impacts identified in the project-specific analysis associated with their specific location and type of action. The CEQA monitoring process includes review, guidance, and reporting components. For second tier documents individual project applicants, in coordination with Los Angeles County, will note which applicable programmatic mitigation measures are being adopted and used and explain why others are not. Individual project applicants will, in coordination with Los Angeles County, provide a schedule for implementing the adopted mitigation measures and for reviewing the implementation of those measures.

It should be noted that standard existing regulations, requirements, and procedures applicable to the project are considered a part of the existing regulatory environment and are not considered or included in mitigation. Table 3.0-1 lists key existing regulations, requirements, and procedures for future development projects pursuant to implementation of the FFTOD Specific Plan (refer to the individual environmental category analyses in Sections 3.1 through 3.16 for a complete discussion of regulations, requirements, and procedures applicable to the project).

**Table 3.0-1: Standard Existing Regulations, Requirements, and Procedures for Future Development Projects Pursuant to Implementation of the FFTOD Specific Plan**

| Key Standard Existing Regulations, Requirements, and Procedures |
|---|
| • Adherence to the FFTOD Specific Plan Standards<br>• Los Angeles County Code<br>• California Building Energy Efficiency Standards<br>• Policy EJ-2.4, Green Building Techniques |

| Key Standard Existing Regulations, Requirements, and Procedures |
|---|
| • Hold current certificates of compliance for ARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]<br>• Los Angeles County's Construction & Demolition (C&D) Debris Recycling and Reuse Ordinance, Chapter 20.87 of the Los Angeles County Code<br>• Los Angeles County's Green Building Ordinance<br>• California Code of Regulations Title 20 and Title 24 (California Building Standards Code, including CALGreen)<br>• Construction General Permit and MS4 Permit<br>• CBC and Los Angeles County Building Code<br>• LID Standards<br>• U.S. Department of Transportation (DOT) regulations listed in 49 CFR, Hazardous Materials Transportation Act<br>• California Department of Transportation standards<br>• California Vehicle Code (Title 13 of the CCR); and Cal/OSHA standards.<br>• Subtitle C of the RCRA (40 CFR Part 263)<br>• Los Angeles County Public Works Green Infrastructure Guidelines<br>• Section 12.08.440 of the LACC<br>• Design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits<br>• Required law enforcement mitigation fees<br>• Construction Traffic Management Plan and Construction Mitigation Plan<br>• SB 50 school impact fees to the LAUSD<br>• One-time Library Facilities Mitigation Fee from developers<br>• Quimby Fees<br>• Site Access Studies |

## 3.0.4 Organization of Environmental Issue Area

Implementation of the proposed FFTOD Specific Plan would result in redevelopment of the Specific Plan Area, which would include construction, and operational activities. The potential environmental impact analysis associated with each environmental topic provided in Chapter 3 is organized as follows:

- Environmental Setting
- Regulatory Setting
- Methodology
- Significance Criteria
- Environmental Impact Analysis
- Mitigation Measures
- Level of Significance After Mitigation
- Cumulative Impacts
- References

### 3.0.4.1 Environmental Setting

This section identifies and describes the existing physical environmental conditions of the FFTOD Specific Plan Area and vicinity associated with each of the impact sections. According to Section 15125(a) of the CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of the proposed project to provide the "baseline condition" to compare project-related impacts against. Normally, the baseline condition is the physical condition that exists when the NOP is published. The NOP for the proposed project was published on March 15, 2021, which is considered the baseline for the analysis provided in this Draft EIR.

### 3.0.4.2 Regulatory Setting

This section provides an understanding of the regulatory environment that exists prior to the implementation of the project. The regulatory framework used in this Draft EIR includes federal, state, and local regulations and policies applicable to the FFTOD Specific Plan Area.

### 3.0.4.3 Methodology

This section describes the sources or methods used in the preparation of the impact analysis for each resource topic; it includes the criteria that help evaluate the degree of significance for each potential impact.

### 3.0.4.4 Significance Criteria

Significance criteria have been developed for each environmental resource in accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist from the Los Angeles County Environmental Document Reporting Procedures and Guidelines. The criteria are defined in the Methodology section and at the beginning of each impact analysis section. Impacts are categorized as follows:

- **Significant and Unavoidable:** potential for significant impact after mitigation measures are implemented
- **Less Than Significant with Mitigation:** mitigation measures, if feasible, shall be recommended to reduce potential impact to less than significant
- **Less Than Significant:** mitigation measures are not required under CEQA
- **No Impact:** mitigation measures are not required

### 3.0.4.5 Environmental Impact Analysis

This section describes environmental changes to the existing physical conditions that may occur if the project is implemented and evaluates these changes with respect to the significance criteria. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained to the extent practicable to provide facts in support of finding the impact to be or not to be significant. In determining whether impacts may be significant, all the potential effects—including direct effects and reasonably foreseeable indirect effects—are considered.

### 3.0.4.6 Mitigation Measures

This section identifies programmatic mitigation measures that can reduce or avoid the potentially significant impacts identified in the analysis. Standard existing regulations, requirements, and procedures applicable to the project are considered a part of the existing regulatory environment and are not considered or included in mitigation. Programmatic mitigation measures are feasible measures that are required—in addition to compliance with existing regulations and requirements—to reduce significant impacts. In addition to measures that the lead agency has the sole authority to implement, mitigation can also include measures that are the responsibility and jurisdiction of another public agency (CEQA Guidelines Section 15091[a][2]).

### 3.0.4.7 Level of Significance After Mitigation

This section indicates what effects remain after the implementation of programmatic mitigation measures and whether the remaining effects are considered significant. When impacts—even with the inclusion of mitigation measures—cannot be mitigated to a less than significant level, they are identified as "unavoidable significant impacts." To approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations at the time of EIR certification. In adopting such a statement, the lead agency must find that it has reviewed the EIR, balanced the benefits of the project against its significant effects, and concluded that the benefits of the project outweigh the unavoidable adverse impacts.

### 3.0.4.8 Cumulative Impacts

This section considers whether two or more individual effects resulting from the incremental impact of a project—when added to other closely related past, present, and reasonably foreseeable probable future projects—may compound or increase other environmental effects. It determines whether the change in the environment results in considerable contributions to cumulative effects.

The cumulative analysis was prepared in accordance with Section 15130 of the State CEQA Guidelines that requires an EIR to discuss cumulative impacts of a project when the incremental effects are cumulatively considerable. Cumulative impacts are defined as an impact that is created as a result of the combination of the project evaluated in this Draft EIR together with other projects causing related impacts. "Cumulatively considerable," means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects. According to Section 15130(b) of the CEQA Guidelines, elements considered necessary to provide an adequate discussion of cumulative impacts of a project include either:

1. *List of past, present, and probable future projects producing related or cumulative impacts; or*
2. *A summary of projection contained in an adopted General Plan or related planning document which is designed to evaluate regional or area-wide conditions.*

The cumulative analysis provided in this Draft EIR is provided in each technical section in Chapter 3. The geographic context for the cumulative analysis is specified for each environmental issue addressed in each section. Unless otherwise identified in the environmental issue addressed in this chapter, a summary of projections in the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities was used to assess

potential environmental effects. These projections provide the anticipated planned population, housing, and employment growth in the region, which for the Florence-Firestone Community (in the absence of the FFTOD Specific Plan) would be 66,072 people, 14,911 housing units, and 9,591 jobs. The projections for the cities in the vicinity of the Florence-Firestone Community, the unincorporated areas of Los Angeles County, and the entire Los Angeles County and provided in Table 3.0-2.

**Table 3.0-2: Cumulative Net Incremental 2035 Growth Projections for the Vicinity of the FFTOD Specific Plan Area**

| Jurisdiction | Population (People)* | Housing (Units)* | Employment (Jobs)* |
|---|---|---|---|
| Los Angeles County | 11,230,479 | 3,823,564 | 5,050,943 |
| Unincorporated Los Angeles County | 1,232,093 | 374,596 | 276,704 |
| City of Los Angeles | 4,472,989 | 1,625,157 | 2,084,689 |
| City of South Gate | 108,746 | 27,389 | 23,357 |
| City of Huntington Park | 65,811 | 16,900 | 18,064 |
| City of Vernon | 264 | 82 | 45,582 |

Notes:
*Derived from the 2016-2040 SCAG Regional Transportation Plan/Sustainable Communities based on a linear growth projection between 2012 and 2040.
Source: SCAG 2016

The cumulative analysis includes an evaluation of the combined effect of the project along with future growth in accordance with the projections provided in Table 3.0-2. In addition, if the combined cumulative effect is significant, then a discussion of the project's contribution to the significant cumulative effect is provided. If the project's contribution is determined to be less than cumulatively considerable, then the project would have a less-than-significant cumulative impact.

Although not required, the cumulative analysis also evaluates the project's contribution to a less-than-significant cumulative effect. This determination consistently found that the project's contribution to a less-than-significant cumulative effect would be less than cumulatively considerable. The analysis in this chapter also includes the recommendation of mitigation measures to be implemented for the project if potential environmental effects were identified as significant under the project-specific analysis or if the project's contribution to significant cumulative effects were determined to be cumulatively considerable under the cumulative analysis. A discussion of the level of impact after the implementation of mitigation measures is provided in the Significance Determination section. If a project-specific impact or a project's contribution to a cumulative impact did not require mitigation measures, then a statement of the level of impact (i.e., no impact or less than significant impact) is provided.

## 3.0.5 References

Sources referenced for each environmental topic analyzed in this document are provided at the end of each section.

Southern California Association of Governments (SCAG). 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies Current Context Demographics and Growth Forecast Appendix. Adopted. April.

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# 3.1 AESTHETICS

This section evaluates the potential for implementation of the proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact aesthetic, scenic, and visual resources.

## 3.1.1 Environmental Setting

### 3.1.1.1 Regional and Community Aesthetics and Visual Character

The proposed FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. Florence-Firestone is an urbanized community approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west. The city of Huntington Park, the city of South Gate, and the unincorporated community of Walnut Park are to the east of Florence-Firestone. The regional urban environment is developed with commercial, industrial, residential uses at various densities, and public facilities, including transportation. The region is generally flat with distant major topographic features.

The LA Metro A (Blue) Line, which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations) and operates numerous bus routes in the community. Three freeways (I-110, I-105, and I-10) are within a 2.5-mile radius of the community. Florence-Firestone is primarily composed of single- and multifamily residential neighborhoods. Commercial activity is concentrated along major transportation routes. The community still has clusters of industrial uses from its industrial past especially along the Alameda Corridor (DRP 2019).

### 3.1.1.2 Views, Light, and Glare

The community is generally laid out in a grid system of streets and has a relatively flat topography with elevations ranging from approximately 175 feet above mean sea level (amsl) in the northwest to 115 feet amsl in the southeast (Yamazaki et al. 2017). Streets provide the communities with long-range views of other urban developed areas and associated roadways and landscaping. Street views include parked and moving vehicles, which are consistent with the urban land uses and character of the community. Overall, views in and surrounding the FFTOD Specific Plan Area consist of urban development, both residential and commercial; streets and associated parking areas; and views of the LA Metro A line tracks that bisect the FFTOD Specific Plan Area north to south. An existing pedestrian bridge over the LA Metro A (Blue) Line tracks at East 76th Street (connecting the western side of the community on 76th Street to Roosevelt Park at Graham Avenue) provides elevated, locally valued viewsheds from the top of the bridge with views of the downtown Los Angeles skyline and San Gabriel Mountains. There are no designated scenic highways, significant ridgelines, or other identified scenic resources in the FFTOD Specific Plan Area (see Section 5.1, Impacts Found Not to Be Significant).

As described, the FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses; existing lighting in the area including streetlights, commercial signage, vehicle lights, parking lot lights, and building lights.

## 3.1.2 Regulatory Setting

### 3.1.2.1 State

#### California Building Code

The California Building Code, Part 2 of Title 24 in the California Code of Regulations, is based on the International Building Code and combines three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards in the International Building Code
- Building standards that have been adopted and adapted from the International Building Code to meet California conditions
- Building standards authorized by the California legislature that constitute extensive additions not covered by the International Building Code and have been adopted to address particular California concerns

The California Building Code includes standards for outdoor lighting that are intended to improve energy efficiency and reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

### 3.1.2.2 Local

#### Florence-Firestone Community Plan

The Florence-Firestone Community Plan (FFCP) is a policy document for the future development, conservation, and maintenance of the Florence-Firestone community. The following aesthetic-related policies of the FFCP pertain to the FFTOD Specific Plan Area:

- **Policy C 4.1—**Attract visitors, pedestrians, and investors to commercial areas by requiring buildings and entrances to orient to the sidewalk and by enhancing streetscapes and infrastructure to create a safe and aesthetically pleasing environment
- **Policy C 4.6—**Provide defining architectural elements and visual interest in new development and renovations to existing structures, including renovating long expanses of windowless walls along the street frontage
- **Policy CN 1.1—**Beautify and ensure safety at transit stations in Florence-Firestone by addressing safety concerns regarding limited visibility at elevated stations, and using amenities such as street trees, seating, shade structures, public art, or other methods to improve aesthetics while maximizing visibility
- **Policy I 4.1—**Require improvements to industrial facilities, operations, and equipment to reduce aesthetic, social, and environmental impacts
- **Policy I 4.2—**Require industrial uses to mitigate negative impacts, including but not limited to, noise, odor, air and water quality, and aesthetics, through site design and adherence to development standards, performance measures, and conditions of approval
- **Policy EJ 3.3—**Enhance the connectivity, safety, and aesthetics of pedestrian and bicycle access routes to parks and open space by providing improved lighting, landscaping, sidewalks, and multi-use pathways

- **Policy TD 3.4—**Create physical and visual connections between each LA Metro Blue Line station and adjacent neighborhoods, public facilities, public parks, and activity centers through installation of identifiable public art elements, inclusive of lighting, community markers, or other elements

## 3.1.3 Methodology

The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refer to the quality of what can be seen, as well as an overall visual perception of the environment. Potential aesthetic impacts can be evaluated by considering proposed building setbacks, scale, massing, typical construction materials, and landscaping features of the project. Nighttime illumination and glare analyses address the effects of a project's exterior lighting on adjoining uses and areas. Light and glare impacts are determined by comparing the existing light sources with the proposed lighting plan or policies.

### 3.1.3.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on aesthetics if it would:

- Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality (public views are those that are experienced from publicly accessible vantage point); or
- Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area.

The thresholds listed below were scoped out of the analysis in the Initial Study (Appendix A), and are only described in Chapter 5, Other CEQA Considerations:

- Have a substantial adverse effect on a scenic vista
- Be visible from or obstruct views from a regional riding, hiking, or multi-use trail
- Substantially damage scenic resources, including—but not limited to—trees, rock outcroppings, and historic buildings within a state scenic highway

## 3.1.4 Environmental Impacts

**AES-1:** *Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point.)*

Implementation of the FFTOD Specific Plan would establish transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian friendly and community serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three

LA Metro A (Blue) Line Stations in the community (Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit oriented development pattern.

The FFTOD Specific Plan includes Guiding Principles and Concepts for each station and that serve as the approach to land use, urban design building standards, and mobility improvements (see Chapter 2, Project Description).

### 3.1.4.1 Zones

This FFTOD Specific Plan establishes new zones for Florence-Firestone to support transit-oriented development strategies for the community. Four mixed use zones are near the transit stations and along major corridors like Slauson Avenue, Compton Avenue, Holmes Avenue, and Nadeau Street. These zones establish setbacks that, through private development over time, can increase the width of the public realm (public right-of-way sidewalks combined with public-accessible private property adjacent to the sidewalk) while providing a range of formats for new employment and services. Mobility improvements such as street crossings and bulb-outs are also identified to make walking and rolling in the community easier in association with these mixed use zones. The FFTOD Specific Plan creates four new residential zones that permit a variety of configurations, unit sizes, densities, and affordability. New housing options and more affordable units are expected to be built in the community in conjunction with State Density Bonus Law and affordable housing programs. The FFTOD Specific Plan zoning standards would require new development along major corridors to increase the width of the perceived sidewalks through setbacks, install street trees, provide private and common open space, and contribute to more greenery in the community. Standards also incentivize community-supportive uses, promote public art and murals, and require large developments to construct publicly accessible open spaces or other community amenities. The FFTOD Specific Plan identifies key street and sidewalk improvements to be implemented by Los Angeles County. All public right-of-way improvements identified by this Specific Plan are intended to balance connectivity, access, and ease of use for people walking, bicycling, rolling, using transit, and driving in the community. Mobility strategies are focused on increasing access and connectivity to transit stations through new infrastructure and facilities that increase safety for pedestrians and bicyclists and support increased ridership over time.

The anticipated visual character of the FFTOD Specific Plan Area at full buildout would vary based on development that would occur in each of the proposed following zones:

- **Industrial Mix (IX) Zone—**The IX Zone is intended to maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for mixed residential and employment areas. The Zone allows for transitions between employment and residential uses to encourage less noxious uses, such as commercial to abut homes, supporting the goals of the Los Angeles County draft Green Zones Program and Ordinance. This Zone allows uses focused on light industrial, neighborhood-serving commercial and office and does not allow residential uses. The IX Zone implements the General Plan Land Use Designation IL Light Industrial.
- **Mixed-Use Transit (MU-T) Zone—**The MU-T Zone is intended to create a high-intensity mixed use transit district with a variety of housing, jobs, and neighborhood services in existing commercial and industrial areas surrounding the Slauson Station. This Zone will allow uses that encourage a more pedestrian-oriented setting with active uses to encourage

walking, bicycling, and multi-modal transportation. The MU-T Zone implements the General Plan Land Use Designation MU Mixed Use.

- **Mixed-Use 3 (MU-3) Zone—**The MU-3 Zone is intended to support employment and higher-density residential uses by encouraging greater job opportunities and homes for communities near transit, focused in existing industrial areas with large sites surrounding the Florence Station. The purpose of this Zone is to create an employment-focused, high-intensity mixed use transit district that allows for transitions between industrial areas and homes with less environmentally intensive uses, such as offices. The MU-3 Zone implements the General Plan Land Use Designation MU Mixed Use.
- **Mixed-Use 2 (MU-2) Zone—**The MU-2 Zone is intended to support "main street" retail, employment, and homes for the communities near transit along existing commercial corridors surrounding the Slauson and Florence stations. This Zone allows uses focused on local neighborhood services, such as local-serving retail, personal services (including salons and accountants), food or groceries, and homes. The MU-2 Zone implements the General Plan Land Use Designation MU Mixed Use.
- **Mixed-Use 1 (MU-1) Zone—**The MU-1 Zone is intended to support mixed use corridors near transit to provide a range of local neighborhood services and homes near transit. The MU-1 Zone implements the General Plan Land Use Designation CM Commercial Major.
- **Residential Low-Medium 1 (RLM-1) Zone—**The RLM-1 Zone is intended to maintain existing residential neighborhoods while supporting a broader range of housing types and configurations, such as duplexes, triplexes, and detached townhomes. The RLM-1 Zone implements the General Plan Land Use Designation H18 Residential.
- **Residential Low-Medium 2 (RLM-2) Zone—**The RLM-2 Zone is intended to maintain existing residential neighborhoods while supporting a broader range of housing types and configurations, such as attached townhomes, apartments, triplexes, and fourplexes. The RLM-2 Zone implements the General Plan Land Use Designation H30 Residential.
- **Residential Medium (RM) Zone—**The RM Zone is intended to apply to existing residential neighborhoods where the purpose is to encourage medium-density residential housing near transit. The Zone allows multi-family residential homes such as apartments and townhomes. The RM Zone implements the General Plan Land Use Designation H50 Residential.
- **Residential Slauson Station (RSS) Zone—**The RSS Zone is intended to encourage the establishment of high-density residential housing near transit in existing neighborhoods. The RSS Zone seeks to provide a wider range of housing types and densities, supporting transit-oriented development. The RSS Zone implements the General Plan Land Use Designation H100 Residential.

Zone regulations intended to guide development and decision making to achieve the vision and guiding principles of the FFTOD Specific Plan provide a detailed list of allowed land uses, permit requirements, and objective development standards for each zone in the FFTOD Specific Plan Area. They would regulate the visual character and quality of the FFTOD Specific Plan Area through residential unit densities (ranging from 18 to 100 dwelling units per acre depending on zone), maximum building heights (e.g., tallest being 72 feet [6 stories] for mixed use zones [MU-T], 65 feet [5 stories] for residential zones [RSS]), fence/wall standards, open space, landscaping, sidewalk requirements, setbacks and stepbacks, transparency and type of materials, modulation standards, pedestrian design, (including public art and lighting), architectural elements, signage, materials/colors, etc. These urban design standards of the FFTOD Specific Plan would provide a comprehensive approach to high quality design for the physical design of the FFTOD Specific

Plan Area and would serve to upgrade and improve the aesthetic appearance of existing buildings, open space areas, and other site improvements through architectural and landscape improvements to enhance the overall visual character of the FFTOD Specific Plan Area.

The FFTOD Specific Plan also includes recommended strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The recommended mobility infrastructure improvements identified support transit, pedestrian, and bicycle mobility, and improve parking conditions. Examples of these strategies include:

- Transit stop amenities improve the transit experience (e.g., shelters, benches, lighting, transit information, trash bins, bicycle racks, and public art)
- Installation of new signage and wayfinding
- Traffic calming measures such as curb extensions, speed bumps, raised crosswalks, traffic circles, and roundabouts help slow the speed of traffic, improve the pedestrian environment, and minimize safety concerns associated with cut-through traffic
- Adding Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street

The FFTOD Specific Plan Area lacks a cohesive walking network. The LA Metro Rail Line creates a barrier to walkability by splitting the community across a mostly impermeable north/south barrier. Additional freight rail lines such as the line that travels southeast away from the Slauson Station create additional challenges to walkability. Some residential and commercial streets have parkways, trees, and space for street furniture, while others are narrow and constrained by walls, without any buffer between pedestrians and vehicle traffic. Some of the block sizes in the community are considered walkable, while others are over 600 feet in length and lack sufficient crossing opportunities. Long distances between pedestrian crossings may encourage people to cross at locations that lack supportive infrastructure like painted crosswalks or traffic signals because reaching such a facility may require longer out-of-direction travel. These conditions reduce both the walkability of the area and safety for pedestrians.

The FFTOD Specific Plan proposes to enhance the walkability, pedestrian comfort, mobility and access, and safety of the area for people walking. The FFTOD Specific Plan would implement the Los Angeles County Transit Oriented District Toolkit (2019) and proposes to enhance the "frontage zone" portion of sidewalks in specific locations. The frontage zone is the portion of private property that abuts the public right-of-way sidewalk. Together, the frontage zone and public sidewalk create the public realm. While sidewalk requirements—including locations and widths—are regulated per Title 22 Chapter 21.24.050 (Highways), which establishes right-of-way and roadway width requirements with cross-section diagrams specifying sidewalk dimensions, the FFTOD Specific Plan establishes required private development street setbacks that would expand the public realm and the perceived width of the sidewalk through an enhanced the frontage zone. In the "furniture zone" of the public sidewalk, the FFTOD Specific Plan requires installation of street trees in specific zones. These requirements—coupled with pedestrian design standards (e.g., building location, entry orientation, and ground floor design)—would help to create a comfortable and attractive sidewalk environment for pedestrians along mixed-use and commercial corridors as property improvements or redevelopment occurs. In addition, three major improvements have been identified to improve access to the LA Metro A Line Stations in the FFTOD Specific Plan Area (and to Roosevelt Park), with a focus on pedestrian accessibility:

- **Southern Slauson Station Access Point.** Formalizing the informal pedestrian pathway leading from 60th Street to Slauson Avenue will connect the neighborhoods south of the Slauson Station to the station entrance. This pathway is already used as an informal access point to the station and provides a more direct path of travel to the station entrance. Formalizing the path will require acquisition of the rail right-of-way underneath the LA Metro A (Blue) Line, coordination with LA Metro, and coordination with Los Angeles County Public Works.
- **Pedestrian Bridge at 76th Street.** Replacement and reconstruction of the pedestrian bridge connecting the west side of the community at East 76th Street to Roosevelt Park at Graham Avenue would improve neighborhood pedestrian connectivity, access to community assets, and access to transit. In addition, by incorporating public art, the reconstruction of this bridge would create a pleasing visual marker for the community, reinforcing locally valued viewsheds at the top of the bridge.
- **Florence Station and Firestone Station Access.** Increasing the ease of reaching a transit station is an important improvement that should be made for each of the stations in the FFTOD Specific Plan Area. The LA Metro A (Blue) Line Stations in the study area each only have one access point. The Slauson Station will see expanded access as the West Santa Ana Branch line is implemented, but the Florence and Firestone stations would also benefit from improved access. At the Florence Station, the community suggested creation of a second at-grade access point at the south end of the station to minimize out-of-direction travel to access the platform. At the Firestone Station, additional amenities under the elevated rail line would improve the pedestrian and transit rider experience. These amenities could include:
    - Better lighting under the rail overcrossing, near the station entrance, and along the blocks adjacent to the station
    - Beautification through murals, art, and landscaping
    - Additional LA Metro communication and emergency call boxes
    - Additional street furniture
    - Additional wayfinding, signage, and branding extending under the overcrossing to the west side of the rail tracks
    - Additional lighting, wayfinding, and pathways to the abutting Leon H Washington Park

Overall, development in accordance with the FFTOD Specific Plan would not degrade the existing visual character of the highly urbanized Florence-Firestone community. Redevelopment of existing and/or new buildings would be designed based on the FFTOD Specific Plan's urban design guidelines and include architectural and landscaping details that complement and enhance the overall quality of the community. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP. As such, the FFTOD Specific Plan would not substantially degrade the existing visual character or quality of public views of the FFTOD Specific Plan Area or its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

**AES-2:** *Would the create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?*

Nighttime illumination and glare impacts are the effects of a project's exterior lighting on adjacent uses and areas. Glare can also be generated by light reflecting off passing cars and large expanses of glazing (e.g., glass windows) or other reflective surfaces. Excessive light and/or glare can impair vision, cause annoyance, affect sleep patterns, and generate safety hazards when experienced by drivers.

Given that the FFTOD Specific Plan Area is a highly urbanized environment, there are a number of existing sources of nighttime illumination, including lighting from the LA Metro A Line and its three stations, parking lot lights, security lights, and interior and exterior lighting from residential, commercial, office, and industrial buildings. Additional nighttime light and glare sources contributing to this environment are generated by surrounding residential and commercial land uses outside of the FFTOD Specific Plan Area, as well as from vehicular traffic and streetlights along I-110, I-105, I-10 and other major roadways.

Buildout of the FFTOD Specific Plan would alter and intensify land uses and their related lighting sources throughout the FFTOD Specific Plan Area by introducing new building (interior and exterior), security, sign, street, and parking lights. The FFTOD Specific Plan also encourages the provision of mobility and transit amenities that can include lighted shelters, wayfinding signage, and additional lighting to increase the accessibility, safety, and convenience of multimodal travel. Additional sources of glare could also be introduced in the form of large expanses of glazing (e.g., glass windows) and building materials (e.g., reflective metal treatments).

The FFTOD Specific Plan includes development standards related to lighting and building materials that would reduce light and glare impacts generated by the project. In general, all outdoor lighting systems, including architectural lighting, shall not aim directly at the open sky, off site, or onto adjacent uses. Blinking, flashing, and oscillating lights are prohibited, and warm white lights shall be used where possible. Colored lights shall be avoided and only be used if they are part of a comprehensive architectural lighting theme of commercial areas or establishments. All parking structures must screen night lighting to avoid uplighting, spillover, and glare on nearby properties. Future development projects shall be required to comply with the specific development standards for lighting of their respective zones. Generally, all lighting and lighting fixtures shall be designed to complement buildings, be of an appropriate scale, avoid creating glare, and provide adequate light over walkways and parking areas to foster pedestrian safety

In addition to development standards for lighting within the FFTOD Specific Plan, future development projects pursuant to implementation of the FFTOD Specific Plan would also be required to comply with California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations), which outlines mandatory provisions for lighting control devices and luminaires. For example, new lighting sources would be required to be installed in accordance with the provisions of Section 110.9 (Mandatory Requirements for Lighting Control Devices and Systems, Ballasts, and Luminaires); this would ensure new lighting sources are not only energy efficient but are regulated based on light power and brightness, shielding, and sensor control standards. Compliance with these state provisions would be ensured through Los Angeles County's development review process and building plan check process.

Overall, development in accordance with the FFTOD Specific Plan would introduce new sources of light and glare. However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with the FFTOD Specific Plan would be typical of the surrounding area and what is expected for an urban, transit-oriented community. Adherence to the FFTOD Specific Plan standards, Los Angeles County Code, and California Building Energy Efficiency Standards would reduce project-generated lighting and glare impacts to less-than-significant levels.

## 3.1.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.1.6 Level of Significance After Mitigation

No programmatic mitigation measures are required. Impacts would be less than significant.

## 3.1.7 Cumulative Impacts

Aesthetic impacts are localized to the FFTOD Specific Plan Area and its immediate surroundings. Given that the FFTOD Specific Plan Area is highly urbanized and completely built out, implementation of the FFTOD Specific Plan and any other future cumulative development that would be accommodated under the County's General Plan would not be expected to negatively impact the visual character of the FFTOD Specific Plan or its surroundings. As with development that would be accommodated by the project, all future cumulative development projects under the County's General Plan would be required to adhere to development standards outlined in the Los Angeles County Code as they relate to aesthetics. Therefore, the project's contribution to cumulative visual character and quality impacts is considered less than significant.

In addition, due to the existence of light and glare from existing commercial, office, industrial, and residential uses in the FFTOD Specific Plan Area, the project is not anticipated to add significant new sources of nighttime light and glare in the vicinity; new light and glare associated with the FFTOD Specific Plan would be typical of the surrounding area and what is expected for an urban, transit oriented community. Adherence to the FFTOD Specific Plan standards and/or Los Angeles County Code and California Building Energy Efficiency Standards would also be applicable to future cumulative development projects. The project's contribution to cumulative light and glare impacts is considered less than significant.

## 3.1.8 References

Los Angeles County Department of Regional Planning (DRP). 2019. Florence-Firestone Community Plan. Available at: https://planning.lacounty.gov/assets/upl/project/ffcp_final_20190903.pdf#page=46 Accessed March 22, 2021.

Yamazaki D., D. Ikeshima, R. Tawatari, T. Yamaguchi, F. O'Loughlin, J.C. Neal, C.C. Sampson, S. Kanae & P.D. Bates. 2017. A high accuracy map of global terrain elevations, Geophysical Research Letters. Available at: https://en-gb.topographic-map.com/ Accessed April 19, 2021.

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# 3.2 AIR QUALITY

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact air quality. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). The analysis in this section is based on buildout of the FFTOD Specific Plan, as modeled using the California Emissions Estimator Model (CalEEMod) and trip generation and vehicle miles traveled (VMT) provided by Fehr & Peers. The trip generation and VMT data and criteria air pollutant emissions modeling for construction and operational phases are provided in Appendix B.

## 3.2.1 Environmental Setting

### 3.2.1.1 South Coast Air Basin

The proposed FFTOD Specific Plan Area is in the South Coast Air Basin (SCAB), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is in a coastal plain with connecting broad valleys and low hills; it is bounded by the Pacific Ocean in the southwest quadrant, and high mountains form the remainder of the perimeter. The general region lies in the semipermanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (SCAQMD 2005).

#### Temperature and Precipitation

The annual average temperature varies little throughout the SCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological stations nearest to the FFTOD Specific Plan Area are the Downey Fire Station FC107C (ID 042494) and the Montebello Station (ID 045790), California, Monitoring Stations. The average low is reported at 55.7°F, and the average high is 79.1°F (WRCC 2021a).

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. Rainfall averages 14.46 inches per year in the project area (WRCC 2021b).

#### Humidity

Although the SCAB has a semiarid climate, the air near the earth's surface is typically moist because of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog, especially along the coast, are frequent. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB (SCAQMD 2005).

#### Wind

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the transport and diffusion of pollutants by inhibiting their eastward transport. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (SCAQMD 2005).

#### Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, there are two similarly distinct types of temperature inversions that control the vertical depth through which pollutants are mixed. These are the marine/subsidence inversion and the radiation inversion. The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the project area (SCAQMD 2005).

### 3.2.1.2 Criteria Pollutants

Individual air pollutants at certain concentrations may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation. Six air pollutants have been identified by the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) as being of concern on both nationwide and statewide levels: ozone, carbon monoxide (CO), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), lead, and particulate matter (PM). PM is subdivided into two classes based on particle size: PM equal to or less than 10 micrometers in diameter ($PM_{10}$) and PM equal to or less than 2.5 micrometers in diameter ($PM_{2.5}$). Because the air quality standards for these air pollutants are regulated using human health and environmentally based criteria, they are commonly referred to as “criteria air pollutants.”

*Ozone.* Ozone is the principal component of smog and is formed in the atmosphere through a series of reactions involving reactive organic gases (ROGs) or volatile organic compounds (VOCs), and nitrogen oxides ($NO_x$) in the presence of sunlight. ROG/VOC and $NO_x$ are called precursors of ozone. $NO_X$ includes various combinations of nitrogen and oxygen, including nitric oxide (NO), $NO_2$, and others. Significant ozone concentrations are usually produced only in the summer, when atmospheric inversions are greatest, and temperatures are high. ROG/VOC and $NO_X$ emissions are both considered critical in ozone formation.

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered the most susceptible sub-groups for ozone effects. Short-term exposure (lasting for a few hours) to ozone can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in sports and live in communities with high ozone levels.

*Carbon Monoxide*. CO is a colorless and odorless gas that, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. Relatively high concentrations are typically found near crowded intersections and along heavily used roadways carrying slow-moving traffic. Even under most severe meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Vehicle traffic emissions can cause localized CO impacts, and severe vehicle congestion at major signalized intersections can generate elevated CO levels, called "hot spots," which can be hazardous to human receptors adjacent to the intersections. Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (oxygen deficiency) as seen at high altitudes.

*Nitrogen Dioxide*. $NO_2$ is a product of combustion and is generated in vehicles and in stationary sources, such as power plants and boilers. It is also formed when ozone reacts with NO in the atmosphere. As noted above, $NO_2$ is part of the $NO_X$ family and is a principal contributor to ozone and smog generation. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children, is associated with long-term exposure to $NO_2$ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Airway contraction and increased resistance to air flow are observed after short-term exposure to $NO_2$ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

*Sulfur Dioxide.* $SO_2$ is a combustion product, with the primary source being power plants and heavy industries that use coal or oil as fuel. $SO_2$ is also a product of diesel engine combustion. $SO_2$ in the atmosphere contributes to the formation of acid rain. $SO_2$ can irritate lung tissue and increase the risk of acute and chronic respiratory disease. In asthmatics, increased resistance to air flow and a reduction in breathing capacity leading to severe breathing difficulties are observed after acute exposure to $SO_2$. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of $SO_2$. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient $SO_2$ levels. In these studies, efforts to separate the effects of $SO_2$ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor.

*Lead.* Lead is a highly toxic metal that may cause a range of human health effects. Previously, the lead used in gasoline anti-knock additives represented a major source of lead emissions to the atmosphere from mobile and industrial sources. EPA began working to reduce lead emissions soon after its inception, issuing the first reduction standards in 1973. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. EPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of EPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death, although it appears that there are no direct effects of lead on the respiratory system.

*Particulate Matter.* PM is a complex mixture of extremely small particles that consists of dry solid fragments, solid cores with liquid coatings, and small liquid droplets. PM is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, soot, and soil or dust particles. Natural sources of PM include windblown dust and ocean spray. The size of PM is directly linked to the potential for causing health problems. EPA is concerned about particles that are 10 micrometers in diameter or smaller, because these particles generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Health studies have shown a significant association between exposure to PM and premature death. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems such as heart attacks and irregular heartbeat (EPA 2016). Individuals particularly sensitive to fine particle exposure include older adults, people with heart and lung disease, and children. A consistent correlation between elevated PM levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer. EPA groups PM into two categories, which are described below.

*$PM_{10}$.* $PM_{10}$ includes both fine and coarse dust particles; the fine particles are $PM_{2.5}$. Coarse particles, such as those found near roadways and dust-producing industries, are larger than 2.5 micrometers and smaller than 10 micrometers in diameter. Sources of coarse particles include crushing or grinding operations and dust from paved or unpaved roads. Control of $PM_{10}$ is primarily achieved through the control of dust at construction and industrial sites, the cleaning of paved roads, and the wetting or paving of frequently used unpaved roads.

*$PM_{2.5}$.* Fine particles, such as those found in smoke and haze, are $PM_{2.5}$. Sources of fine particles include all types of combustion activities (e.g., motor vehicles, power plants, wood burning) and certain industrial processes. $PM_{2.5}$ is also formed through reactions of gases, such as $SO_2$ and $NO_X$, in the atmosphere. $PM_{2.5}$ is the major cause of reduced visibility (haze) in California.

### 3.2.1.3 Toxic Air Contaminants

In addition to criteria pollutants, both federal and state air quality regulations also focus on toxic air contaminants (TACs). TACs can be separated into carcinogens and noncarcinogens based on the nature of the effects associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Any exposure to a carcinogen poses some risk of contracting cancer. Noncarcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

TACs may be emitted by stationary, area, or mobile sources. Common stationary sources of TAC emissions include gasoline stations, dry cleaners, and diesel backup generators, which are subject to local air district permit requirements. The other, often more significant, sources of TAC emissions are motor vehicles on freeways, high-volume roadways, or other areas with high numbers of diesel particulate matter-emitting activities, such as distribution centers and railyards. Off-road mobile sources are also major contributors of TAC emissions and include construction equipment, ships, and trains.

### 3.2.1.4 SCAB Nonattainment Designations

Health-based air quality standards have been established for these criteria pollutants by the United States Environmental Protection Agency (EPA) at the national level and by CARB at the state level. These standards, called California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) were established to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. California has also established standards for sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. The standards are provided in Table 3.2-3. The Air Quality Monitoring Plan (AQMP) developed by the SCAQMD provides the framework for air quality basins to achieve attainment of the CAAQS and NAAQS through the State Implementation Plan (SIP). Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet the ambient air quality standards. Severity classifications for nonattainment are marginal, moderate, serious, severe, and extreme.

- Unclassified: A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- Attainment: A pollutant is in attainment if the Ambient Air Quality Standards (AAQS) for that pollutant was not violated at any site in the area during a 3-year period.
- Nonattainment: A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- Nonattainment/Transitional: A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SCAB is provided in Table 3.2-1. The SCAB is designated as a maintenance area for CO and $PM_{10}$, as a nonattainment area for ozone and $PM_{2.5}$, and as an unclassifiable or attainment area for $NO_2$ and $SO_2$ under the NAAQS. Additionally, the SCAB is designated as a partial nonattainment area for the Los Angeles County portion of the SCAB for

near-source monitors for the lead NAAQS. The SCAB is designated as an attainment area for all criteria air pollutants except ozone, $PM_{10}$, and $PM_{2.5}$ under the CAAQS.

**Table 3.2-1: Attainment Status of Criteria Pollutants in the South Coast Air Basin**

| Pollutant | State | Federal |
|---|---|---|
| Ozone – 1-hour | Nonattainment | No Federal Standard |
| Ozone – 8-hour | Nonattainment | Nonattainment (Extreme) |
| $PM_{10}$ | Nonattainment | Attainment (Maintenance) |
| $PM_{2.5}$ | Nonattainment | Nonattainment (Serious) |
| CO | Attainment | Attainment (Maintenance) |
| $NO_2$ | Attainment | Unclassifiable/Attainment |
| $SO_2$ | Attainment | Unclassifiable/Attainment |
| Lead | Attainment | Nonattainment (Los Angeles County only) |
| All Others | Attainment/Unclassified | No Federal Standards |

Source: SCAQMD 2016

### 3.2.1.5 SCAB Multiple Air Toxics Exposure Study IV

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study on ambient concentrations of TACs and the potential health risks from air toxics in the SCAB.

In 2015, the SCAQMD published the Multiple Air Toxics Exposure Study IV (MATES IV), a monitoring and evaluation study conducted in the SCAB. The MATES IV consists of a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the SCAB. The study focuses on the carcinogenic risk from exposure to air toxics. The MATES IV estimated population weighted risk in the SCAB is 897 per million, a decrease of about 57 percent compared to the previous study (MATES III). The study also showed that diesel exhaust emissions had declined by about 70 percent, but diesel PM continued to account for about two-thirds of the cancer risk from air toxics (SCAQMD 2017a). MATES IV also extrapolated excess cancer risk levels throughout the SCAB by modeling specific grids. MATES IV estimates an excess cancer risk of 1,040 to 1,593 per million for the area surrounding the Project Site (SCAQMD 2015a). SCAQMD has begun the MATES V, which will include an updated emissions inventory of TACs and updated modeling effort to characterize risk across the SCAB.

### 3.2.1.6 Existing Ambient Air Quality

Existing ambient air quality, historical trends, and projections in the vicinity of the FFTOD Specific Plan Area are best documented by measurements made by SCAQMD. The FFTOD Specific Plan Area is in Source Receptor Area (SRA) 12–Southcentral Los Angeles County Coastal. The air quality monitoring station closest to the FFTOD Specific Plan Area is the Compton Station, located approximately 4 miles south of the FFTOD Specific Plan Area. This station monitors ozone, $NO_2$, and $PM_{2.5}$. Data for CO was obtained from the SCAQMD Historical Air Quality Data by Year for SRA 12. Data for $PM_{10}$ was obtained from the Los Angeles-North Main Street Station, approximately 5.5 miles north of the FFTOD Specific Plan Area. The most current 3 years of data monitored at these stations are provided in Table 3.2-2. The data show recurring violations of the $PM_{10}$ and $PM_{2.5}$ standards. The federal and state 8-hr $O_3$ standard were

exceeded in 2017 and 2019. The CO standards have not been violated in the last 3 years in the vicinity of the FFTOD Specific Plan Area.

**Table 3.2-2: Ambient Air Quality Monitoring Summary**

| Pollutant Standard | 2017 | 2018 | 2019 |
|---|---|---|---|
| **Ozone** | | | |
| State 1-Hour ≥ 0.09 ppm (days exceed threshold) | 0 | 0 | 1 |
| State 8-hour ≥ 0.07 ppm (days exceed threshold) | 5 | 0 | 1 |
| Federal 8-Hour > 0.070 ppm (days exceed threshold) | 5 | 0 | 1 |
| Max. 1-Hour Conc. (ppm) | 0.092 | 0.075 | 0.100 |
| Max. 8-Hour Conc. (ppm) | 0.076 | 0.064 | 0.079 |
| **Carbon Monoxide (CO)** | | | |
| State 8-Hour > 9.0 ppm (days exceed threshold) | * | * | * |
| Federal 8-Hour ≥ 9.0 ppm (days exceed threshold) | * | * | * |
| Max. 8-Hour Conc. (ppm) | 4.6 | 3.5 | 3.2 |
| Max. 1-Hour Conc. (ppm) | 6.1 | 4.7 | 3.8 |
| **Nitrogen Dioxide ($NO_2$)** | | | |
| State 1-Hour ≥ 0.18 ppm (days exceed threshold) | 0 | 0 | 0 |
| Federal 1-Hour ≥ 0.100 ppm (days exceed threshold) | 0 | 0 | 0 |
| Max. 1-Hour Conc. (ppb) | 99.1 | 68.3 | 70.0 |
| **Coarse Particles ($PM_{10}$)** | | | |
| State 24-Hour > 50 μg/$m^3$ (days exceed threshold) | 40 | 31 | 15 |
| Federal 24-Hour > 150 μg/$m^3$ (days exceed threshold) | 0 | 0 | 0 |
| Max. 24-Hour Conc. (μg/$m^3$) | 96.2 | 81.2 | 93.9 |
| **Fine Particulates ($PM_{2.5}$)** | | | |
| Federal 24-Hour > 35 μg/$m^3$ (days exceed threshold) | 15 | 6 | 1 |
| Max. 24-Hour Conc. (μg/$m^3$) | 66.7 | 49.4 | 39.5 |

Source: CARB 2021; SCAQMD 2020.
Notes: ppm = parts per million; ppb = parts per billion, μg/m3 = micrograms per cubic meter
* Data not available

### 3.2.1.7 Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent because the

majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population.

## 3.2.2 Regulatory Setting

Air quality in the SCAB is regulated by EPA, CARB, and the SCAQMD. Each of these agencies develops rules, regulations, or policies, and/or goals to attain the directives imposed through legislation. Although EPA regulation may not be superseded, both state and local regulations may be more stringent. Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the FFTOD Specific Plan are summarized below.

### 3.2.2.1 Federal and State Laws

#### Ambient Air Quality Standards

The Clean Air Act was passed in 1963 by the U.S. Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The Clean Air Act allows states to adopt more stringent standards or to include other pollutants. The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The NAAQS and CAAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

As described previously, both California and the federal government have established health-based AAQS for seven air pollutants, which are provided in Table 3.2-3, Ambient Air Quality Standards for Criteria Pollutants. These pollutants are ozone, $NO_2$, CO, $SO_2$, $PM_{10}$, $PM_{2.5}$, and lead (Pb). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

**Table 3.2-3: Ambient Air Quality Standards for Criteria Pollutants**

| Pollutant | Averaging Time | California Standard | Federal Primary Standard | Major Pollutant Sources |
|---|---|---|---|---|
| Ozone ($O_3$) | 1 hour | 0.09 ppm | * | Motor vehicles, paints, coatings, and solvents. |
| | 8 hours | 0.070 ppm | 0.070 ppm | |
| Carbon Monoxide (CO) | 1 hour | 20 ppm | 35 ppm | Internal combustion engines, primarily gasoline-powered motor vehicles. |
| | 8 hours | 9.0 ppm | 9 ppm | |

| Pollutant | Averaging Time | California Standard | Federal Primary Standard | Major Pollutant Sources |
|---|---|---|---|---|
| Nitrogen Dioxide ($NO_2$) | Annual Arithmetic Mean | 0.030 ppm | 0.053 ppm | Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads. |
| | 1 hour | 0.18 ppm | 0.100 ppm | |
| Sulfur Dioxide ($SO_2$) | Annual Arithmetic Mean | * | 0.030 ppm | Fuel combustion, chemical plants, sulfur recovery plants, and metal processing. |
| | 1 hour | 0.25 ppm | 0.075 ppm | |
| | 24 hours | 0.04 ppm | 0.14 ppm | |
| Respirable Coarse Particulate Matter ($PM_{10}$) | Annual Arithmetic Mean | 20 µg/m$^3$ | * | Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays). |
| | 24 hours | 50 µg/m$^3$ | 150 µg/m$^3$ | |
| Respirable Fine Particulate Matter ($PM_{2.5}$) | Annual Arithmetic Mean | 12 µg/m$^3$ | 12 µg/m$^3$ | Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays). |
| | 24 hours | * | 35 µg/m$^3$ | |
| Lead (Pb) | 30-Day Average | 1.5 µg/m$^3$ | * | Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline. |
| | Calendar Quarter | * | 1.5 µg/m$^3$ | |
| | Rolling 3-Month Average | * | 0.15 µg/m$^3$ | |
| Sulfates ($SO_4$) | 24 hours | 25 µg/m$^3$ | * | Industrial processes |
| Visibility Reducing Particles | 8 hours | ExCo = 0.23/km visibility of 10 ≥ miles | * | Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. |
| Hydrogen Sulfide | 1 hour | 0.03 ppm | * | Hydrogen sulfide ($H_2S$) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation. |
| Vinyl Chloride | 24 hour | 0.01 ppm | * | Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents. |

Source: CARB 2016

### Tanner Air Toxics Act and Air Toxics "Hot Spot" Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and to reduce exposure to them. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a

present or potential hazard to human health" (17 California Code of Regulations [CCR] § 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 U.S. Code § 7412[b]) is a toxic air contaminant. Under state law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate "toxics best available control technology" to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

The CARB also adopted a Diesel Risk Reduction Plan, which recommends control measures to achieve a diesel PM reduction of 85 percent by 2020 from year 2000 levels. Recent regulations and programs include the low-sulfur diesel fuel requirement and more stringent emission standards for heavy-duty diesel trucks and off-road in-use diesel equipment. As emissions are reduced, it is expected that the risks associated with exposure to the emissions will also be reduced.

CARB has promulgated the following specific rules to limit TAC emissions:

- 13 CCR Chapter 10, § 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- 13 CCR Chapter 10, § 2480, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- 13 CCR § 2477 and Article 8, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

The CARB has also developed the Air Quality and Land Use Handbook: A Community Health Perspective to provide guidance on land use compatibility with sources of TACs (CARB 2005). These sources include freeways and high-traffic roads, commercial distribution centers, rail yards, refineries, dry cleaners, gasoline stations, and industrial facilities. The handbook is not a law or adopted policy but offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs. The handbook indicates that land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues. In response to new research demonstrating benefits of compact, infill development along transportation corridors, CARB released a technical supplement, Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways (Technical

Advisory; CARB 2017), to the 2005 Air Quality and Land Use Handbook. This Technical Advisory was developed to identify strategies that can be implemented to reduce exposure at specific developments or as recommendations for policy and planning documents. It is important to note that it is not intended as guidance for a specific project and does not discuss the feasibility of mitigation measures for the purposes of compliance with the California Environmental Quality Act (CEQA). Some of the strategies identified in the Technical Advisory include implementation design that promotes air flow and pollutant dispersion along street corridors, solid barriers, vegetation for pollutant dispersion, and indoor high efficiency filtration (CARB 2017).

### Air Quality Management Planning

SCAQMD is the agency responsible for improving air quality in the SCAB and assuring that the National and California AAQS are attained and maintained. SCAQMD is responsible for preparing the AQMP for the SCAB in coordination with the Southern California Association of Governments (SCAG). Since 1979, a number of AQMPs have been prepared.

#### *2016 AQMP*

The 2016 AQMP addresses strategies and measures to attain the 2008 federal 8-hour ozone standard by 2031, the 2012 federal annual $PM_{2.5}$ standard by 2025, the 2006 federal 24-hour $PM_{2.5}$ standard by 2019, the 1997 federal 8-hour ozone standard by 2023, and the 1979 federal 1-hour ozone standard by year 2022. It is projected that total NOx emissions in the SCAB would need to be reduced to 150 tons per day (tpd) by year 2023 and to 100 tpd in year 2031 to meet the 1997 and 2008 federal 8-hour ozone standards. The strategy to meet the 1997 federal 8-hour ozone standard would also lead to attaining the 1979 federal 1-hour ozone standard by year 2022 (SCAQMD 2017b), which requires reducing NOx emissions in the SCAB to 250 tpd. Reducing NOx emissions would also reduce $PM_{2.5}$ concentrations within the SCAB. However, as the goal is to meet the 2012 federal annual $PM_{2.5}$ standard no later than year 2025, SCAQMD is seeking to reclassify the SCAB from "moderate" to "serious" nonattainment under this federal standard. A "moderate" nonattainment would require meeting the 2012 federal standard by no later than 2021. Overall, the 2016 AQMP is composed of stationary and mobile-source emission reductions from regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile-source strategies, and reductions from federal sources such as aircrafts, locomotives, and ocean-going vessels. Strategies outlined in the 2016 AQMP would be implemented in collaboration between CARB and the EPA (SCAQMD 2017b). The 2016 AQMP was adopted on March 3, 2017. The SCAQMD is currently in the process of developing the 2022 AQMP, which will address the requirements of meeting the 2015 federal 8-hour ozone standard.

#### *Lead State Implementation Plan*

In 2008, the EPA designated the Los Angeles County portion of the SCAB as a nonattainment area under the federal lead classification due to the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in the City of Vernon and the City of Industry that exceeded the new standard in the 2007-to-2009 period. The remainder of the SCAB, outside the Los Angeles County nonattainment area, remains in attainment of the new 2008 Pb standard. On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the EPA revised in 2008. Lead concentrations in this

nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was approved by the EPA on April 11, 2014.

### *SCAQMD Rules and Regulations*

All projects are subject to SCAQMD rules and regulations in effect at the time of activity, including:

- Rule 401, Visible Emissions. This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than 3 minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.
- Rule 402, Nuisance. This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- Rule 403, Fugitive Dust. This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust, and requires best available control measures to be applied to earth moving and grading activities.
- Rule 1113, Architectural Coatings. This rule limits the VOC content of architectural coatings used on projects in the SCAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the SCAQMD must comply with the current VOC standards set in this rule.
- Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators.
- Rule 445, which reduces the emissions of PM from woodburning devices by prohibiting the installation of wood-burning devices into new developments.
- Title 24 Building Efficiency Standards

New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The Building Energy and Efficiency Standards and CALGreen are updated tri-annually with a goal to achieve net zero energy for residential buildings by 2020 and nonresidential buildings by 2030. CalGreen is periodically amended; the most recent 2019 standards became effective on January 1, 2020.

Additionally, new buildings are required to adhere to the CALGreen requirement to provide bicycle parking for new nonresidential buildings, or meet local bicycle parking ordinances, whichever is stricter (CALGreen Sections 5.106.4.1, 14.106.4.1, and 5.106.4.1.2). Nonresidential construction would be required to provide anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added. For employee, long-term secured bicycle parking is required to be provided for five percent of the tenant-occupied (i.e., staff) motorized vehicle parking spaces being added. CALGreen also requires designated parking for low-emitting, fuel-efficient, and carpool/vanpool spaces. Nonresidential buildings of 25,000 square feet or more also requires compliance with the Tier°1 voluntary measures in section A5.601.2.4, which require low-emitting, fuel-efficient, and carpool/vanpool spaces for 10 percent of the total parking capacity.

#### California Code of Regulations

Construction activities will be conducted in compliance with 13 CCR Section 2499, which requires that nonessential idling of construction equipment is restricted to 5 minutes or less.

### 3.2.2.2 Local

#### Los Angeles County Code—Title 31

The Los Angeles County green building standards which implement and exceed CALGreen are identified in the Los Angeles County Code, Title 31. Los Angeles County has adopted the Voluntary Tier 1 standards for nonresidential construction greater than or equal to 25,000 square feet (Section 301.3.1, Buildings greater than or equal to 25,000 square feet).[1] Newly constructed high-rise residential buildings of seven stories or greater are also required to comply with Section 301.3, which requires implementation of the Voluntary Tier 1 standards. Newly constructed low-rise and high-rise residential buildings (six stories or less) are only required to comply with the mandatory measures of CALGreen.

#### Los Angeles County General Plan

The General Plan guides growth in the unincorporated communities of Los Angeles County through goals, policies, and programs that discourage sprawling development patterns; protect areas with hazard, environment and resource constraints; encourage infill development in areas near transit, services and existing infrastructure; and make a strong commitment to ensuring sufficient services and infrastructure. It also lays the foundation for future community-based planning initiatives that will identify additional opportunities for accommodating growth. The General Plan includes the following applicable air quality-related policies:

- **Policy AQ 1.1:** Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.
- **Policy AQ 1.2:** Encourage the use of low or no VOC-emitting materials.
- **Policy AQ 1.3:** Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.

[1] With the exception that high-rise nonresidential construction would be subject to the mandatory (Table A4.106.5.1[3]), rather than the Tier 1 voluntary, measures for solar reflectance in Table A5.106.11.2.2.

- **Policy AQ 2.1:** Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.
- **Policy AQ 2.3:** Support the conservation of natural resources and vegetation to reduce and mitigate air pollution impacts.

#### Florence-Firestone Community Plan

The Florence-Firestone Community Plan (FFCP) is a policy document for the future development, conservation, and maintenance of the Florence-Firestone community. The following air quality-related policies of the FFCP pertain to the FFTOD Specific Plan Area:

- **Policy R 4.6:** Promote healthy indoor air quality through the use of zero- and low- VOC materials, installation of air filtration systems, and other measures.
- **Policy I 3.2:** Require compliance of existing uses with the most current industrial emission control regulations.
- **Policy I 4.2:** Require industrial uses to mitigate negative impacts, including but not limited to, noise, odor, air and water quality, and aesthetics, through site design and adherence to development standards, performance measures, and conditions of approval.
- **Policy EJ 2.1:** Require that new development, especially those located near sources of air pollution, such as major highways and heavy industry, be designed to ensure safe indoor air quality.

## 3.2.3 Methodology

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with implementation of the FFTOD Specific Plan. SCAQMD has published guidelines that are intended to provide local governments with guidance for analyzing and mitigating air quality impacts and that were used in this analysis (SCAQMD 1993; SCAQMD 2008; SCAQMD 2017c, SCAQMD 2019). Industrial sources of emissions that require a permit from SCAQMD (permitted sources) are not included in the FFTOD Specific Plan Area inventory because they have separate emission reduction requirements. Modeling of criteria air pollutants was conducted using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. On-road transportation sources are based on trip generation rates and VMT provided by Fehr & Peers (Fehr & Peers 2021).

### 3.2.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard
- Expose sensitive receptors to substantial pollutant concentrations

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

### South Coast Air Quality Management District Thresholds

The analysis of the project's air quality impacts follows the guidance and methodologies recommended in SCAQMD's CEQA Air Quality Handbook and the significance thresholds on SCAQMD's website.[2] CEQA allows the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. SCAQMD has established regional thresholds of significance. In addition to the regional thresholds, projects are subject to the AAQS.

### Regional Significance Thresholds

SCAQMD has adopted the following regional construction and operational emissions thresholds provided in Table 3.2-4 to determine a project's cumulative impact on air quality in the SCAB.

**Table 3.2-4: SCAQMD Significance Thresholds**

| Air Pollutant | Construction Phase | Operational Phase |
|---|---|---|
| Reactive Organic Gases (ROG) | 75 lbs/day | 55 lbs/day |
| Carbon Monoxide (CO) | 550 lbs/day | 550 lbs/day |
| Nitrous Oxides (NOx) | 100 lbs/day | 55 lbs/day |
| Sulfur Oxides SOx | 150 lbs/day | 150 lbs/day |
| Particulates ($PM_{10}$) | 150 lbs/day | 150 lbs/day |

Source: SCAQMD 2019

Projects that exceed the regional significance threshold contribute to the nonattainment designation of the SCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health.

Mass emissions provided in Table 3.2-4 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SCAB. Therefore, regional emissions from a single project do not trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed in Section 3.2.1.2 above. SCAQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SCAB. To achieve the health-based standards established by the EPA, SCAQMD prepares an AQMP that details regional programs to attain the AAQS.

### Localized Significance Thresholds

Project-related criteria air pollutant emissions may have the potential to exceed the CAAQS and NAAQS in the area surrounding a project, even though these pollutant emissions may not be significant enough to create a regional impact to the SCAB. In order to assess local air quality impacts, the SCAQMD has developed Localized Significance Thresholds (LSTs) and supporting LST Methodology to assess the project-related emissions in the project vicinity (SCAQMD 2008).

[2] SCAQMD's air quality significance thresholds are current as of April 2019 and can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.

The LST Methodology found that the primary emissions of concern are $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$. These LSTs are provided in Table 3.2-5. Emissions of $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ generated at a project site (offsite mobile-source emissions are not included in the LST analysis) could expose sensitive receptors to substantial concentrations of criteria air pollutants. A project that generates emissions that trigger a violation of the AAQS when added to the local background concentrations would cause a significant impact.

**Table 3.2-5: SCAQMD Localized Significance Thresholds**

| Air Pollutant (Relevant AAQS) | Concentration |
|---|---|
| 1-Hour CO Standard (CAAQS)[1] | 20 ppm |
| 8-Hour CO Standard (CAAQS/NAAQS) | 9.0 ppm |
| 1-Hour $NO_2$ Standard (CAAQS) | 0.18 ppm |
| Annual Average $NO_2$ Standard (CAAQS)[1] | 0.03 ppm |
| 24-Hour $PM_{10}$ Standard – Construction (SCAQMD)[2] | 10.4 µg/m$^3$ |
| 24-Hour $PM_{2.5}$ Standard – Construction (SCAQMD)[2] | 10.4 µg/m$^3$ |
| 24-Hour $PM_{10}$ Standard – Operation (SCAQMD)[2] | 2.5 µg/m$^3$ |
| 24-Hour $PM_{2.5}$ Standard – Operation (SCAQMD)[2] | 2.5 µg/m$^3$ |
| Annual Average $PM_{10}$ Standard (SCAQMD)[2] | 1.0 µg/m$^3$ |

Source: SCAQMD 2015b.
AAQS = Ambient Air Quality Standards
CAAQS = California Ambient Air Quality Standards
SCAQMD = South Coast Air Quality Management District
ppm = parts per million
µg/m3 = micrograms per cubic meter
[1] Based on the more restrictive California AAQS for CO and NO2.
[2] Threshold is based on SCAQMD Rule 403.
The SCAQMD has developed mass rate Look-Up Tables containing different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors which may be used as a screening localized analysis for individual projects. The Look-Up Tables provide thresholds for 1, 2, and 5-acre projects sites. The LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS and are developed based on the ambient concentrations of that pollutant for each source receptor area. Since the LSTs consider the ambient air quality, LSTs can also be used to identify those projects that would result in significant levels of air pollution and impact sensitive receptors. The applicable mass-rate LSTs for 1- 2-, and 5-acre projects in SRA 12 are provided in Table 3.2-6.

**Table 3.2-6: SCAQMD Mass Rate Localized Significance Thresholds**

| Project Size/Pollutant | Allowable Construction/Operations Emissions (pounds/day) as a function of receptor distance (feet) from site boundary | | | | |
|---|---|---|---|---|---|
| | pounds per day | | | | |
| 1 Acre | 25 (m) | 50 (m) | 100 (m) | 200 (m) | 500 (m) |
| NOx | 46/46 | 46/46 | 54/54 | 70/70 | 109/109 |
| CO | 231/231 | 342/342 | 632/632 | 1,545/1,545 | 5,452/5,452 |
| $PM_{10}$ | 4/1 | 12/3 | 26/7 | 54/13 | 139/34 |
| $PM_{2.5}$ | 3/1 | 4/1 | 7/2 | 17/4 | 70/17 |
| 2 Acres | | | | | |
| NOx | 65/65 | 64/64 | 69/69 | 82/82 | 117/117 |
| CO | 346/346 | 515/515 | 841/841 | 1,817/1,817 | 5,962/5,962 |
| $PM_{10}$ | 7/2 | 20/5 | 34/9 | 62/15 | 146/36 |

| Project Size/Pollutant | Allowable Construction/Operations Emissions (pounds/day) as a function of receptor distance (feet) from site boundary | | | | |
|---|---|---|---|---|---|
| | pounds per day | | | | |
| $PM_{2.5}$ | 4/1 | 6/2 | 9/3 | 19/5 | 74/18 |
| 5 Acres | | | | | |
| NOx | 98/98 | 94/94 | 101/101 | 111/111 | 139/139 |
| CO | 630/630 | 879/879 | 1,368/1,368 | 2,514/2,514 | 7,389/7,389 |
| $PM_{10}$ | 13/4 | 41/10 | 55/14 | 83/20 | 166/40 |
| $PM_{2.5}$ | 7/2 | 10/3 | 15/4 | 27/7 | 86/21 |

Notes:
CO = carbon monoxide
lbs/day = pounds per day
$NO_x$ = nitrous oxides
$PM_{2.5}$ = Fine particles, less than 2.5 micrometers
$PM_{10}$ = coarse dust particles 2.5 micrometers and smaller than 10 micrometers in diameterIf the project exceeds any applicable LST when the mass rate look-up tables are used as a screening analysis, then project specific air quality modeling may be performed. In the event that the project area exceeds 5 acres, it is recommended that lead agencies perform project-specific air quality modeling for these larger projects.
Source: SCAQMD 2008

### CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels, as well as implementation of control technology on industrial facilities, CO concentrations in the SCAB and the state have steadily declined.

### Health Risk Analysis

Whenever a project would require use of chemical compounds that have been identified in SCAQMD Rule 1401; placed on CARB's air toxics list pursuant to AB 1807, the Air Contaminant Identification and Control Act (1983); or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by SCAQMD. A list of SCAQMD's TAC incremental risk thresholds for operation of a project is provided in Table 3.2-7. The purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project. (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369 [Case No. S213478]). CEQA does not require analysis of the proposed project's environmental effects from siting sensitive receptors. However, the environmental document must analyze the impacts of environmental hazards on future users when a proposed project exacerbates an existing environmental hazard or condition.

**Table 3.2-7: SCAQMD Toxic Air Contaminants Incremental Risk Thresholds**

| Air Pollutant (Relevant AAQS) | Concentration |
|---|---|
| Maximum Individual Cancer Risk | ≥ 10 in 1 million |
| Cancer Burden (in areas ≥ 1 in 1 million) | > 0.5 excess cancer cases |
| Hazard Index (project increment) | ≥ 1.0 |

Notes:
AAQS = Ambient Air Quality Standards
Source: SCAQMD 2019

## 3.2.4 Environmental Impacts

**AQ-1:** *Would the project conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD or the Antelope Valley AQMD (AVAQMD)?*

CEQA requires that projects be evaluated for consistency with the AQMP. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental effects of a project under consideration at a stage early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals of the AQMP. The regional emissions inventory for the SCAB is compiled by SCAQMD and SCAG. Regional population, housing, and employment projections developed by SCAG are based, in part, on the local jurisdictions' general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP. These demographic trends are incorporated into the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; "Connect SoCal"), compiled by SCAG to determine priority transportation projects and vehicle miles traveled (VMT) within the SCAG region. Projects that are consistent with the local general plan are considered consistent with the air quality–related regional plan. Typically, only new or amended general plan elements, specific plans, and major projects that have the potential to affect the regional population and employment forecasts need to undergo a consistency review.

Per CEQA Guideline Section 15206, the FFTOD Specific Plan is considered regionally significant by SCAG. Changes in the population, housing, or employment growth projections associated with this project have the potential to substantially affect SCAG's demographic projections and therefore the assumptions in SCAQMD's AQMP. The project would increase the land use intensity within the FFTOD Specific Plan Area, resulting in an increase in population and employment in Florence-Firestone. Because regional transportation modeling is based on the underlying general plan land use designation, the FFTOD Specific Plan could potentially change the assumptions of the AQMP.

The AQMP ensures that the region is on track to attain the NAAQS and CAAQS. When a project has the potential to exceed the assumptions of the AQMP because it is more intensive than the underlying land use designation, criteria air pollutants generated during operation of development that would be accommodated by that project are compared to SCAQMD's regional significance thresholds (Impact AQ-2), which were established to determine whether a project has the potential to cumulatively contribute to the SCAB's nonattainment designations. Development that would be accommodated by the FFTOD Specific Plan would exceed SCAQMD's regional operational

thresholds for all pollutants except SOx. As a result, the project could potentially exceed the assumptions in the AQMP and would not be considered consistent with the AQMP.

However, the FFTOD Specific Plan would be consistent with SCAG's regional goals of providing infill housing, improving the jobs-housing balance, and integrating land uses near major transportation corridors. Building upon the recommendations of SCAG's RTP/SCS, the intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, and reduce VMT. The FFTOD Specific Plan includes Guiding Principles and Concepts for each station and that serve as criteria for decision making. The proposed zones in the FFTOD Specific Plan Area along with the proposed Guiding Principles and Concepts are consistent with Los Angeles County policies and are provided to ensure land use designation compatibility and minimization of potential environmental impacts as build-out of the FFTOD Specific Plan occurs. The Guiding Principles in the FFTOD Specific Plan would promote pedestrian-friendly, active transit-oriented districts and corridors that support land uses that provide a variety of local services, employment, and housing. Additionally, the FFTOD Specific Plan would support a green community through enhanced streetscapes, a variety of publicly accessible open spaces, landscaping, and sustainability. Further, the FFTOD Specific Plan would also improve safety, connectivity, access, and ease of use for all modes of transportation.

The FFTOD Specific Plan would also promote community-wide transit oriented development concepts by focusing mixed use zoning around LA Metro stations to activate those areas and combine improvements in sidewalks, bicycle facilities, and setback conditions to create active transit corridors that make accessing stations easier. The FFTOD Specific Plan would also include concepts for each LA Metro station to enable more homes, businesses, and services within walking distance and improve station access with pedestrian improvements.

Furthermore, the FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit-oriented development, promote active transportation, improve access to transit, reduce VMT by cars, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. The socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan Area include higher densities and more growth than is assumed in Connect SoCal (but is consistent with its goals for focusing higher-density development in transit-rich areas). As such, the FFTOD Specific Plan would be consistent with and would not conflict with SCAG's regional planning goals and policies.

As identified in Section 3.14, Transportation, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. As such, the FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population, which is consistent with regional goals to reduce passenger VMT.

However, despite furthering the regional transportation and planning objectives included within the RTP/SCS and AQMP, the FFTOD Specific Plan would represent a substantial increase in emissions compared to existing conditions and would exceed SCAQMD's regional operational significance thresholds (see AQ-2). As a result, the FFTOD Specific Plan could potentially exceed

the assumptions in the AQMP and would not be considered consistent with the AQMP. Based on the analysis above, impacts related to conflict with or obstructing implementation of applicable air quality plans of the SCAQMD would be potentially significant.

**AQ-2:** *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?*

### Construction

A project would normally have a significant effect on the environment if it violates any air quality standard or contributes substantially to an existing or projected air quality violation. Construction activities produce combustion emissions from various sources, such as onsite heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities produce fugitive dust emissions ($PM_{10}$ and $PM_{2.5}$) from grading, excavation, and demolition.

Construction activities would temporarily increase VOC, NOx, SOx, CO, $PM_{10}$, and $PM_{2.5}$ emissions within the SCAB. Construction activities associated with buildout of the FFTOD Specific Plan are anticipated to occur over approximately 15 years. Buildout would comprise of multiple smaller projects undertaken by individual developers/project applicants, each having its own construction timeline and activities. Development of multiple properties could occur at the same time; however, there is no defined development schedule for these future projects at this time. Due to the size of the FFTOD Specific Plan Area and variability of land uses, as well as the uncertainty of the construction timing, it was assumed that different types of construction activities (i.e. site preparation, grading, paving, building construction, and application of architectural coatings) could occur simultaneously at various locations within the FFTOD Specific Plan Area. Modeling of construction emissions was conducted for the year 2022, as this is assumed to be the earliest year during which construction would occur for the future development of the FFTOD Specific Plan Area. For purposes of modeling emissions associated with construction of future development of the FFTOD Specific Plan, it is conservatively assumed that up to 25 percent of all land uses within the FFTOD Specific Plan Area could be developed within the earliest possible construction year (2022). An estimate of maximum daily construction emissions is provided in Table 3.2-8. The modeled emissions shown account for compliance with SCAQMD Rules 403 and 1113.

**Table 3.2-8: Estimate of Construction Emissions in the FFTOD Specific Plan**

| Source | Criteria Air Pollutants (pounds per day)[1, 2] | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Maximum Daily Emissions | 106.96 | 152.58 | 209.84 | 0.54 | 52.98 | 21.03 |
| SCAQMD Regional Construction Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant? | **Yes** | **Yes** | No | No | **Yes** | **Yes** |

Notes:
CO = carbon monoxide
$NO_x$ = nitrous oxides
$PM_{2.5}$ = Fine particles, less than 2.5 micrometers
$PM_{10}$ = coarse dust particles 2.5 micrometers and smaller than 10 micrometers in diameter
$SO_2$ = sulfur dioxide

VOC = volatile organic compound
[1]Construction equipment mix is based on CalEEMod default construction mix. See Appendix B for a list of assumptions on emissions generated on a worst-case day.
[2] Grading activities includes compliance with SCAQMD Rule 403 fugitive dust control measures. Measures include requiring an application of water at least twice per day to at least 80 percent of the unstabilized disturbed on-site surface areas, and restricting speeds on unpaved roads to less than 15 miles per hour. Modeling also assumes a VOC of 50 g/L for interior and 100 g/L for exterior paints pursuant to SCAQMD Rule 1113.
Source: CalEEMod 2020.4

As shown in the table, construction activities associated with the FFTOD Specific Plan could potentially exceed the SCAQMD regional thresholds for VOC, NOx, $PM_{10}$, and $PM_{2.5}$. Therefore, impacts would be potentially significant.

### Operation

Buildout of the FFTOD Specific Plan would result in direct and indirect criteria air pollutant emissions from transportation, energy (natural gas use), and area sources (e.g., natural gas fireplaces, aerosols/consumer products, landscaping equipment). The FFTOD Specific Plan would result in a net increase of 12,110 dwelling units and approximately 1,183,013 nonresidential square feet. Development that would be accommodated by the FFTOD Specific Plan would generate a net increase of 65,478 weekday average daily trips ends, resulting in 528,764 additional daily VMT at project buildout (see Appendix B). For the purpose of this Environmental Impact Report (EIR), the buildout year is assumed to be 2035. Operational emissions estimates are provided in Table 3.2-9. The modeled emissions shown account for compliance with SCAQMD Rules 445.

**Table 3.2-9: Maximum Daily FFTOD Specific Plan Operational Phase Regional Emissions**

| Source | Criteria Air Pollutants (pounds per day)[1] | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Area | 421.52 | 906.86 | 1,376.71 | 5.77 | 77.93 | 77.93 |
| Energy | 3.71 | 31.93 | 15.33 | 0.20 | 2.56 | 2.56 |
| Mobile Sources | 152.56 | 143.18 | 1,477.94 | 3.13 | 429.65 | 115.69 |
| Total Emissions | 577.79 | 1,081.98 | 2,869.98 | 9.10 | 510.14 | 196.19 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Exceeds Regional Threshold | **Yes** | **Yes** | **Yes** | No | **Yes** | **Yes** |
| **Combined Construction + Operation (Worst-Case)** | | | | | | |
| Combined Construction + Operation | 684.75 | 1,234.56 | 3,079.82 | 9.63 | 563.12 | 217.22 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Significant?** | **Yes** | **Yes** | **Yes** | No | **Yes** | **Yes** |

Note:
CO = carbon monoxide
$NO_x$ = nitrous oxides
PM 2.5 = Fine particles, less than 2.5 micrometers
PM10 = coarse dust particles 2.5 micrometers and smaller than 10 micrometers in diameter
SO2 = sulfur dioxide
VOC = volatile organic compound
Totals may not add due to rounding.
1 Area source emissions assumes compliance with SCAQMD Rule 445, which prohibits the installation of wood-burning devices in new development.
Source: CalEEMod 2020.4

Maximum daily emissions at buildout once construction is complete and during a worst-case year from overlap of the project with construction are provided in Table 3.2-9; the operational phase of the FFTOD Specific Plan at buildout and the potentially overlapping construction and operational activities would generate air pollutant emissions that exceed SCAQMD's regional significance thresholds for all criteria air pollutant emissions, except SOx. Emissions of VOC, NOx, CO, $PM_{10}$, and $PM_{2.5}$ that exceed the SCAQMD regional threshold would cumulatively contribute to the ozone, $PM_{10}$, and $PM_{2.5}$ nonattainment designation of the SCAB. However, it is important to note that construction of the new residential and nonresidential uses would be based on market-demand and would be constructed over the approximately 15-year project buildout; therefore, the construction emissions provided in Table 3.2-8 and Table 3.2-9 are conservative as it assumes that 25 percent of all the land uses are constructed in a single year.

In addition to the emissions from mobile, energy, and area sources, it is possible that operational activities within the FFTOD Specific Plan Area could include new stationary sources, which also generate long-term operational emissions. For example, the Light Industrial (IL) and Heavy Industrial (IH) land use designations included within the FFTOD Specific Plan could potentially include stationary emissions sources. Any such stationary sources would be required to obtain permits from SCAQMD, which are issued with the intent of reducing air pollution and attaining (or maintaining) the ambient air quality standards. Permitted stationary-source facilities are required to implement Best Available Control Technology, which may include the installation of emissions control equipment or implementation of administrative practices to reduce emissions. Stationary-source facilities may also be required to offset their emissions of criteria air pollutants in order to be permitted. Information on operations of stationary sources within the FFTOD Specific Plan Area is not available at this time and associated emissions have not been estimated. These emissions would be in excess of those provided in Table 3.2-9.

While buildout of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions, emissions associated with operation of future development of the FFTOD Specific Plan could exceed or contribute substantially to an existing or projected air quality violation. Therefore, implementation of the FFTOD Specific Plan would result in a significant impact because it would significantly contribute to the nonattainment designations of the SCAB. Based on the analysis above, the impact would be potentially significant.

**AQ-3:** *Would the project expose sensitive receptors to substantial pollutant concentrations?*

### Health Effects of Criteria Air Pollutants

#### *Construction and Operation*

As detailed in Impact AQ-2, criteria air pollutant emissions associated with construction and operation of the FFTOD Specific Plan have the potential to exceed the SCAQMD thresholds of significance; and thus, may cause or contribute substantially to an existing or projected air quality violation.

As described in Section 3.2.1, health effects associated with ozone include respiratory symptoms, worsening of lung disease, and damage to lung tissue. In recent years, a correlation has also been reported between elevated ambient ozone levels and increases in daily hospital admission rates and mortality (EPA 2020). VOC and NOx are precursors to ozone, for which the SCAB is

designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOC and NOx to regional ambient ozone concentrations is the result of complex photochemistry. The increases in ozone concentrations in the SCAB due to ozone precursor emissions tend to be found downwind of the source location because of the time required for the photochemical reactions to occur. Further, the potential for exacerbating excessive ozone concentrations would also depend on the time of year that the emissions would occur, because exceedances of the ozone NAAQS and CAAQS tend to occur when solar radiation is highest. Due to the lack of quantitative methods to assess this complex photochemistry, the holistic effect of a single project's emissions of ozone precursors is speculative. That being said, because implementation of the FFTOD Specific Plan would result in exceedances of the SCAQMD ROG and NOx thresholds for construction and operation, the FFTOD Specific Plan could contribute to regional health effects associated with ozone.

Health effects associated with CO include dizziness, headaches, and fatigue. CO exposure is especially harmful to individuals who suffer from cardiovascular and respiratory diseases (EPA 2020b). CO tends to be a localized impact associated with congested intersections. The potential for CO hotspots is discussed below as a part of Impact AQ-3 and determined to be less than significant. Thus, the FFTOD Specific Plan's CO emissions would not contribute to significant health effects associated with CO.

Health effects associated with NOx and $NO_2$ include aggravating of existing respiratory diseases, particularly asthma, resulting in respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. Because the SCAB is a designated attainment area for $NO_2$ (and $NO_2$ is a constituent of $NO_X$) and the existing $NO_2$ concentrations in the area are well below the NAAQS and CAAQS standards, it is not anticipated that the FFTOD Specific Plan would cause an exceedance of the NAAQS and CAAQS for $NO_2$ or result in potential health effects associated with $NO_2$. Nonetheless, because implementation of the FFTOD Specific Plan could exceed the SCAQMD mass daily $NO_X$ threshold, the FFTOD Specific Plan could contribute to health effects associated with NOx and $NO_2$.

Health effects associated with short- and long-term exposure to elevated concentrations of $PM_{10}$ include respiratory symptoms, aggravation of respiratory and cardiovascular diseases, a weakened immune system, and cancer (WHO 2018). $PM_{2.5}$ poses an increased health risk because these very small particles can be inhaled deep in the lungs and may contain substances that are particularly harmful to human health. Operation of the FFTOD Specific Plan would exceed the SCAQMD threshold for $PM_{10}$ and $PM_{2.5}$. As such, the FFTOD Specific Plan would potentially contribute to exceedances of the NAAQS and CAAQS for PM and obstruct the SCAB from coming into attainment for these pollutants. Because the FFTOD Specific Plan has the potential to contribute substantial PM emissions, the FFTOD Specific Plan could result in associated health effects.

Recent rulings from the California Supreme Court (including the Sierra Club v. County of Fresno, 2018, 6 Cal. 5th 502 case regarding the proposed Friant Ranch Project) have underscored the need for evaluation of potential health impacts resulting from the emissions of criteria pollutants during operations of proposed projects. Although the analysis of project-level health risks related to the emissions of CO and TACs has long been incorporated under CEQA, the analysis of health impacts due to individual projects resulting from emissions of criteria air pollutant emissions has long been

focused on a regional or air basin-wide level, typically evaluated through regional air quality planning efforts, such as under AQMPs and the SIP. This is because the complex reactions and conditions that lead to the formation of ozone and PM in the atmosphere can result in the transport of pollutants over wide areas and result in health impacts from criteria air pollutants being experienced on a regional scale, whereas TACs and CO act on a more localized scale in proximity to emissions source locations. The potential for criteria air pollutant emissions to be transported over wide areas means that the emissions of ozone precursor pollutants, such as VOC and $NO_X$, from a project site or even plan area like the FFTOD Specific Plan Area does not necessarily translate directly into a specific concentration of ozone or a specific health risk in that same area.

Per the California Supreme Court's ruling on Sierra Club v. County of Fresno, 2018, an EIR "must provide an adequate analysis to inform the public how its bare numbers translate to create potential adverse impacts or it must explain what the agency does know and why, given existing scientific constraints, it cannot translate potential health impacts further." Currently, SCAQMD, CARB, and EPA have not approved a quantitative method to meaningfully and consistently translate the mass emissions of criteria air pollutants from a project to quantified health effects. As explained in the amicus brief filed by the SCAQMD in the Sierra Club v. County of Fresno (2014) 26 Cal.App.4th 704, it "takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels" (SCAQMD 2015c).

As discussed above, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible.

As described above and provided in Table 3.2-6, the SCAQMD has also developed mass-based emission indicators for localized air quality impacts for both construction and operational phases of a project. The SCAQMD has established conservative screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: 1) the area in which the project is located; 2) the size of the project site; and 3) the distance between the project site and the nearest sensitive receptor. Since the timing and level of construction associated with buildout of the FFTOD Specific Plan area is subject to market conditions and not possible to predict, the individual project site acreages, construction and operational emissions, and distance to the nearest sensitive receptors, cannot be readily estimated.

Therefore, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level environmental analysis. Because potential redevelopment could occur close to existing sensitive receptors, the development that would be accommodated by the FFTOD Specific Plan has the potential to expose sensitive receptors to substantial pollutant concentrations of criteria pollutants. Therefore, this impact is potentially significant.

### *Health Effects from Toxic Air Contaminants*

#### Construction

Heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with construction could generate diesel PM (DPM), which the CARB has identified as a TAC. Implementation of the FFTOD Specific Plan would result in the construction and redevelopment of buildings, structures, paved areas, and other improvements. Generation of DPM from construction projects typically occurs in a single area (e.g., at the project site) for a short period of time and along vehicle routes for mobile sources (e.g., haul trucks and material deliveries). Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (CARB 2005). Therefore, even in intensive phases of construction, any potential substantial DPM concentrations would be limited to the immediate vicinity of the construction site.

In addition, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed amount of emissions would result in higher health risks for the maximally exposed individual. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments used to determine the exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period. However, such assessments should also be limited to the period/duration associated with construction activities. OEHHA recommends that construction activities for individual projects that are longer than 2 months be evaluated for potential cancer risks (OEHHA 2015). For buildout of the FFTOD Specific Plan Area, construction activities and related emissions would vary depending on the phase of construction (e.g., grading, building construction), and therefore, the construction-related emissions to which nearby receptors are exposed would also vary throughout the construction period. Although the location and timing of construction for development within the FFTOD Specific Plan Area is notionally determined, the exact duration and location with respect to sensitive receptors still cannot be determined at the time of this analysis. Therefore, it is conservatively assumed that certain construction activities would result in the exposure of sensitive receptors to substantial TAC concentrations. This impact from construction-related TACs is considered potentially significant.

It is important to note that emissions from construction equipment would be reduced over the duration of the buildout of the FFTOD Specific Plan. The use of newer off-road equipment is effective in reducing PM emissions from off-road equipment used during construction; while not required, these vehicles are increasingly in use in construction equipment fleets. In January 2001, EPA promulgated a final rule to reduce emissions standards for heavy-duty diesel engines in 2007 and subsequent model years. These emissions standards represented a 90 percent reduction in $NO_X$ emissions, 72 percent reduction of nonmethane hydrocarbon emissions, and 90 percent reduction of PM emissions in comparison to the emissions standards for the 2004 model year. In December 2004, CARB adopted a fourth phase of emission standards (Tier 4) in the Clean Air Non-Road Diesel Rule that are nearly identical to those finalized by EPA on May 11, 2004. As such, engine manufacturers were required to meet after-treatment-based exhaust standards for $NO_X$ and PM starting in 2011 that are more than 90 percent lower than 2004 levels, putting emissions from off-road engines virtually on par with those from on-road heavy-duty diesel engines. More recently, Senate Bill 1 was passed in 2017 and further enforces adherence to emissions regulations for

diesel-fueled vehicles. In addition to funding transportation-related projects, Senate Bill 1 requires the Department of Motor Vehicles to refuse registration or renewal or transfer of registration for certain diesel-fueled vehicles, based on weight and model year, that are subject to specified provisions relating to the reduction of emissions of DPM, NOx, and other criteria pollutants from in-use diesel-fueled vehicles. As construction equipment continues to turnover and/or be retrofitted over time, DPM emissions associated with construction will continue to decrease.

### Operation

Certain land uses are more likely than others to generate substantial TAC emissions due to allowable activities within those land use designations. Residential land uses do not typically generate substantial TAC emissions. Commercial land uses may potentially include stationary sources of TACs, such as gasoline-dispensing activities and diesel-fueled back-up generators. Land uses that are more likely to generate substantial TAC emissions include industrial land uses that involve stationary sources and manufacturing processes, such as dry-cleaning establishments. In addition, heavily trafficked roadways can serve as a TAC source due to the vehicle emissions, particularly DPM.

Future development in the FFTOD Specific Plan Area is anticipated to include mixed-use, residential, retail, commercial and industrial uses. Commercial land uses may potentially include stationary sources of TACs, such as dry-cleaning establishments and diesel-fueled back-up generators. Land uses that are more likely to generate substantial TAC emissions include industrial land uses that involve stationary sources, manufacturing processes, or attract diesel-fueled vehicle trips. In addition to stationary/area sources of TACs, warehousing and trucking facilities could generate a substantial amount of DPM emissions from off-road equipment use and truck idling.

As described above, CARB's Handbook provides guidance concerning land use compatibility with regard to sources of TAC emissions (CARB 2005). The recommendations relevant to the future development of the FFTOD Specific Plan Area include:

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads carrying 100,000 vehicles per day, or rural roads carrying 50,000 vehicles per day.
- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard.
- Avoid siting new sensitive land uses within 300 feet of a large gasoline station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gasoline dispensing facilities.
- Avoid siting new sensitive land uses within 300 feet of any dry-cleaning operation using perchloroethylene. For operations with two or more machines, provide 500 feet. For operations with three or more machines, consult the local air district. Do not site new sensitive land uses in the same building with dry-cleaning operations that use perchloroethylene.
- Avoid the siting of new commercial trucking facilities that accommodate more than 100 trucks per day, or 40 trucks equipped with transportation refrigeration units (TRUs), within 1,000 feet of sensitive receptors (e.g., residences).
- In the vicinity of the FFTOD Specific Plan Area, the Alameda Corridor is located directly adjacent from the southeastern perimeter of the FFTOD Specific Plan Area at the closest point, and this portion of the rail line does not include any rail service or maintenance

operations that would result in substantial train idling or other similar increased emissions. The CARB Handbook also recommends avoiding the siting of new sensitive land uses within 500 feet of a freeway or urban roads carrying 100,000 vehicles per day. There are no such roadways in the vicinity of the FFTOD Specific Plan. The highest roadway volume under the future project-buildout condition is approximately 65,478 trips per day (Fehr & Peers 2021). In addition, I-110 is over 7,300 feet west of the FFTOD Specific Plan Area.

- With consideration of more recent scientific analysis, CARB published a 2017 Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways (Technical Advisory); with careful evaluation of exposure, health risks, and affirmative steps to reduce risk, CARB outlines strategies that would allow infill development, mixed use, higher density, transit-oriented development, and/or other development types that benefit regional air quality to be compatible with protecting the health of individuals at the neighborhood level. There are many recognized benefits of compact development, such as promotion of physical activity, support of transit development and other VMT reducing design features, and facilitation of community connectivity. To attain these benefits, among others, while minimizing potential health risks due to TAC exposure, CARB's Technical Advisory provides a compilation of CARB-recommended strategies to reduce exposure to traffic-related pollution that are not exclusively based on maintaining minimum distances between a source and receptor.

Although commercial and industrial uses that would be developed under the FFTOD Specific Plan have not been specifically identified, it is possible that uses developed under the FFTOD Specific Plan could have tenants that would emit TACs during operations, such as through the operations of gasoline-dispensing facilities or diesel-fueled backup generators. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD. In addition, the FFTOD Specific Plan's Industrial Mix District (IX Zone) is intended to maintain neighborhood-appropriate light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for mixed residential and employment areas. The IX Zone allows for the creation of transitions between employment uses and residential to encourage less noxious uses, such as commercial, to abut homes, supporting the goals of the Los Angeles County Green Zones Program and Ordinance. The zone allows uses focused on light industrial, neighborhood-serving commercial and office. The IX Zone will encourage a healthier environment where industrial business and residents can co-exist and be more compatible.

However, due to uncertainty associated with specific development within each land use type identified within the FFTOD Specific Plan, it is possible that development within the FFTOD Specific Plan Area could general substantial TAC emissions as a result of long-term operations. It is also possible that sensitive receptors could be located at distances from stationary sources that would expose them to substantial TAC concentrations. Therefore, this impact is considered potentially significant.

### *CO Hotspots*

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. At the time of the 1993 SCAQMD Handbook, the SCAB was designated

nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SCAB and in the state have steadily declined. In 2007, the SCAQMD was designated in attainment/maintenance for CO under both the CAAQS and NAAQS. Furthermore, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2017). Buildout of the FFTOD Specific Plan would result in an increase of approximately 65,478 average daily trips. Distributing the total daily vehicle trips within the FFTOD Specific Plan Area and only during peak hours would result in smaller traffic volumes at the various intersections. Thus, implementation of the FFTOD Specific Plan would not produce the volume of traffic required to generate a CO hotspot. Therefore, implementation of the proposed project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the planning area, and impacts would be less than significant.

**AQ-4:** *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The proposed project would not result in other emissions (such as those leading to odors) that would affect a substantial number of people. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

Future development under the FFTOD Specific Plan is assumed to include mixed-use, residential, retail, commercial service, and industrial uses. New industrial uses would be required to be in compliance with SCAQMD Rule 402. Likewise, existing facilities are required to be in compliance with SCAQMD Rule 402 to prevent nuisances on sensitive land uses. In addition, the FFTOD Specific Plan includes land use regulations and development standards for TOD zones, which for mixed use communities for example, denote that operations shall not create objectionable and/or obnoxious dust, light, matter, mud, noise, odor, refuse, smoke, steam, vibration, maintenance needs of grounds or buildings, or other nuisance(s). Therefore, impacts related to other emissions, such as those leading to odors, would be less than significant.

## 3.2.5 Programmatic Mitigation Measures

The potential to impact to air quality would be mitigated to the greatest extent practicable by implementing the following programmatic mitigation measures:

**MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the U.S. Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

**MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering.

- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, $PM_{10}$-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection.
- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day.
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

**MM AQ-3** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings.

**MM AQ-4** For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:

- installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions
- using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied)
- establishing staging areas for the construction equipment that are as far as possible from sensitive receptors
- communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes

- planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses
- use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy
- incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers)

**MM AQ-5** When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future.

**MM AQ-6** For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.

Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.

. Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:

- locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open

- providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations
- requiring the TAC-generating activity (e.g., loading docks) be located away from sensitive receptors
- incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers)
- develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits
- require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock
- use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy
- evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet
- evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips
- provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure
- ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities
- use vegetated buffers between substantial TAC-generating source locations and sensitive receptors

If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:

- installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions
- using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied)
- establishing staging areas for the construction equipment that are as far as possible from sensitive receptors
- rerouting construction trucks away from congested streets or sensitive receptor areas
- communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes

- documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation
- establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible
- using haul trucks with on-road engines instead of off-road engines
- equipping nearby buildings with High Efficiency Particle Arresting (HEPA)filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings
- planning construction phasing so that future construction activities continue to move further away from occupied land uses
- planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site

**MM-AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

## 3.2.6 Level of Significance After Mitigation

### Impact AQ-1

Programmatic mitigation measures MM AQ-1 through AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. Implementation of MM AQ-1 would require the use of heavy-duty equipment powered with engines that meet CARB Tier 4 Final emissions standards, and thereby reduce construction-related exhaust emissions, particularly $NO_X$. MM AQ-2 would ensure that the applicable SCAQMD Rule 403 requirements are implemented to reduce fugitive dust ($PM_{10}$ and $PM_{2.5}$) emissions during construction. MM AQ-3 require the use of "super-compliant" VOC architectural coatings in all possible applications during construction or the use of water-based paints, thereby further reducing VOC emissions from this construction-related source. MM AQ-7 would eliminate operational emissions of VOC, NOx, and PM associated with fireplaces.

However, emissions of criteria air pollutants and precursors could still exceed significance thresholds (Table 3.2-10 and Table 3.2-11). In addition, although the regional planning efforts and relevant air quality plans are updated on a regular basis and it is, therefore, reasonable to assume that future air quality plans will account for development of the FFTOD Specific Plan Area, growth projections used for the purposes of the relevant air quality plans do not currently account for development of the FFTOD Specific Plan Area. As such, implementation of the FFTOD Specific Plan could conflict with the assumptions or obstruct implementation of the AQMP. Therefore, Impact AQ-1 would remain significant and unavoidable.

### Impact AQ-2

Implementation of MM AQ-1 would require the use of heavy-duty equipment powered with engines that meet CARB Tier 4 Final emissions standards, and thereby reduce construction-related exhaust emissions from off-road construction equipment. MM AQ-2 would ensure that the applicable SCAQMD Rule 403 requirements are implemented to reduce fugitive dust ($PM_{10}$ and $PM_{2.5}$) emissions during construction. MM AQ-3 require the use of "super-compliant" VOC architectural coatings in all possible applications during construction or the use of water-based paints, thereby further reducing VOC emissions from this construction-related source. MM AQ-3 would be consistent with County of LA General Plan Policy AQ 1.2 and FFCP Policy R 4.6, which encourage the use of low- or no VOC emitting materials.

Estimated mitigated construction-related emissions from development of up to 25 percent of the FFTOD Specific Plan Area within the earliest possible year of construction are provided in Table 3.2-10. The emission estimates below applied programmatic mitigation measures include watering all exposed active construction areas at least two times daily, reducing vehicle speeds on unpaved roadways to 15 miles per hour, and use of heavy-duty construction equipment (greater than 50 horsepower) that meet Tier 4 Final emissions standards.

**Table 3.2-10: Estimate of Mitigated Regional Construction Emissions in the FFTOD Specific Plan**

| Source | Criteria Air Pollutants (pounds per day)[1, 2] | | | | | |
|---|---|---|---|---|---|---|
| | VOC | NOx | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| Maximum Daily Emissions | 29.28 | 38.15 | 221.69 | 0.54 | 47.40 | 15.89 |
| SCAQMD Regional Construction Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant? | No | No | No | No | No | No |

Notes:
CO = carbon monoxide
NOx = nitrous oxides
PM 2.5 = Fine particles, less than 2.5 micrometers
PM10 = coarse dust particles 2.5 micrometers and smaller than 10 micrometers in diameter
SO2 = sulfur dioxide
VOC = volatile organic compound
[1]Construction equipment mix is based on CalEEMod default construction mix. See Appendix B for a list of assumptions on emissions generated on a worst-case day.
[2] Grading activities includes compliance with SCAQMD Rule 403 fugitive dust control measures. Measures include requiring an application of water at least twice per day to at least 80 percent of the unstabilized disturbed on-site surface areas, and restricting speeds on unpaved roads to less than 15 miles per hour. Modeling also assumes a VOC of 50 g/L for interior and 100 g/L for exterior paints pursuant to SCAQMD Rule 1113.
Source: CalEEMod 2020.4

Implementation of MM AQ-1 through AQ-3 would substantially reduce PM and ozone precursor emissions to levels below the SCAQMD thresholds of significance (Table 3.2-10). However, although VOC emissions would be reduced substantially as a result of implementation of MM AQ-3 to use "super-compliant" VOC architectural coatings wherever possible, there may be instances in which the necessary application is not available as a super-compliant VOC product, and emissions could be higher than modeled. Similarly, there may be instances in which off-road equipment items that are a specialty, or unique, piece of equipment cannot be found with a Tier 4 or better engine, and emissions could be higher than modeled. Because the assumptions used to estimate potential construction-related emissions are conservative, it is possible that construction related to implementation of the FFTOD Specific Plan would not exceed SCAQMD thresholds of

significance. However, since the timing and level of construction activities each year is unknown, it is not possible to refine these assumptions and determine the extent to which additional reduction strategies are feasible or would result in emission reductions. In addition, the overlapping construction and operational activities would continue to exceed the SCAQMD thresholds of significance (Table 3.2-11). Therefore, it is conservatively assumed that construction-related emissions could exceed significance thresholds and, this is impact is significant and unavoidable.

Implementation of MM AQ-7 would ban fireplaces in new residential development, and thereby reduce operational emissions of VOC, NOx, and PM. The estimated mitigated operations-related and overlapping construction and operational emissions associated with buildout of the FFTOD Specific Plan are provided in Table 3.2-11.

**Table 3.2-11: Mitigated Maximum Daily FFTOD Specific Plan Operational Phase Regional Emissions**

| Source | Criteria Air Pollutants (pounds per day)[1] | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Area | 316.74 | 11.49 | 995.70 | 0.05 | 5.54 | 5.54 |
| Energy | 3.71 | 31.93 | 15.33 | 0.20 | 2.56 | 2.56 |
| Mobile Sources | 152.56 | 143.18 | 1,477.94 | 3.13 | 429.65 | 115.69 |
| Total Emissions | 473.01 | 186.60 | 2,488.97 | 3.38 | 437.75 | 123.80 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Exceeds Regional Threshold | **Yes** | **Yes** | **Yes** | No | **Yes** | **Yes** |
| **Combined Construction + Operation (Worst-Case)** | | | | | | |
| Combined Construction + Operation | 502.29 | 224.75 | 2,710.65 | 3.92 | 485.15 | 139.69 |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Significant?** | **Yes** | **Yes** | **Yes** | No | **Yes** | **Yes** |

Notes;
CO = carbon monoxide
NOx = nitrous oxides
PM 2.5 = Fine particles, less than 2.5 micrometers
PM10 = coarse dust particles 2.5 micrometers and smaller than 10 micrometers in diameter
SO2 = sulfur dioxide
VOC = volatile organic compound
1 Area source emissions assumes compliance with SCAQMD Rule 445, which prohibits the installation of wood-burning devices in new development.
Source: CalEEMod 2020.4

Mitigated emissions are substantially reduced compared to the unmitigated estimates (Table 3.2-11). However, although implementation of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions emission estimates, the operational emissions would continue to exceed the SCAQMD thresholds of significance. In addition, because the specific development projects within the FFTOD Specific Plan Area cannot be defined at the time of this analysis, precise effectiveness and feasibility of additional measures cannot be determined for individual future projects, and operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures available to address this impact. Therefore, this impact is significant and unavoidable.

### Impact AQ-3

#### *Health Effects of Criteria Air Pollutants*

Emissions would be substantially reduced as a result of implementation of MM AQ-1 through AQ-3 and AQ-7 (Table 3.2-10 and Table 3.2-11). As discussed above, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible. In addition, no expert agency has yet to approve a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature between air pollutants and health effects in conjunction with local environmental variables (City of Los Angeles 2019). Therefore, at the time, it is infeasible for this EIR to directly link the FFTOD's Specific Plan significant air quality impacts with a specific health effect.

In addition, as described previously, the SCAQMD has also developed mass-based emission indicators for localized air quality impacts for both construction and operational phases of a project. Since the timing and level of construction associated with buildout of the FFTOD Specific Plan area is subject to market conditions and not possible to predict, the individual project site acreages, construction and operational emissions, and distance to the nearest sensitive receptors, cannot be readily estimated. Therefore, MM AQ-4 would be required to ensure that new development projects that are 1 acre or larger do not exceed the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. Implementation of MM AQ-4 would ensure that future development that could generate localized emissions during construction and operations would evaluate and mitigate emissions to ensure that sensitive receptors are not exposed to substantial localized concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known. With the feasible actions outlined that have been demonstrated to substantially reduce exposure to emissions and the clear performance standards included in this mitigation, with implementation of mitigation, this impact would be reduced to a less-than-significant level.

#### *Health Effects from Toxic Air Contaminants*

MM AQ-1, MM AQ-5, and MM AQ-6 would reduce impacts to sensitive receptors associated with construction-related mobile emissions from construction equipment and operational TAC sources. In addition, the FFTOD Specific Plan's Industrial Mix District (IX Zone) is intended to maintain neighborhood-appropriate light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for mixed residential and employment areas. The IX Zone allows for the creation of transitions between employment uses and residential to encourage less noxious uses, such as commercial, to abut homes, supporting the goals of the Los Angeles County Green Zones Program and Ordinance.

The buffer distances incorporated into MM AQ-5 are consistent with the buffer recommendations in the CARB *Air Quality and Land Use Handbook* and are also consistent with Los Angeles County General Plan Policy AQ 1.1 which is to minimize health risks to people from industrial

toxic or hazardous air pollutant emissions). In addition, implementation of MM AQ-6 would ensure that future development that could generate TAC emissions during construction and operations would evaluate and mitigate TAC emissions to ensure that sensitive receptors are not exposed to substantial TAC concentrations. MM AQ-6 would be consistent with Los Angeles County General Plan Policy AQ 2.1 (to encourage the application of design and other appropriate measures when siting sensitive uses within proximity to major sources of air pollution) and FFCP Policy EJ 2.1 (to require that new development, especially those located near sources of air pollution, such as major highways and heavy industry, be designed to ensure safe indoor air quality). This evaluation and mitigation design is only possible once project-specific details for the TAC-generating use and the sensitive receptors are known. With the feasible actions outlined that have been demonstrated to substantially reduce exposure to TAC emissions and the clear performance standards included in MM AQ-5 and MM AQ-6, with implementation of mitigation, this impact would be reduced to a less-than-significant level.

## 3.2.7 Cumulative Impacts

In accordance with the SCAQMD methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects in the local area include new development and general growth within the SCAB. The greatest source of emissions within the SCAB is mobile sources. Due to the extent of the area potentially impacted from cumulative project emissions, SCAQMD considers a project cumulatively significant when project-related emissions exceed the SCAQMD regional emissions thresholds provided in Table 3.2-5.

### Construction

The SCAB is designated as a nonattainment area for ozone, $PM_{2.5}$, and lead (Los Angeles County only) under the NAAQS and CAAQS and nonattainment for $PM_{10}$ as well under the CAAQS. Construction of cumulative projects would further degrade the regional and local air quality. Air quality would be temporarily impacted during construction activities. Implementation of programmatic mitigation measures for related projects would reduce cumulative impacts. However, project-related construction emissions, overlapping with operational emissions associated with the FFTOD Specific Plan, could still potentially exceed the SCAQMD significance thresholds on a project and cumulative basis. Consequently, the contribution of the proposed FFTOD Specific Plan to cumulative air quality impacts would be cumulatively considerable and therefore would be significant.

### Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values is not considered by SCAQMD to be a substantial source of air pollution and does not add significantly to a cumulative impact. Operation of the proposed FFTOD Specific Plan would result in emissions in excess of the SCAQMD regional emissions thresholds for VOC, CO, NOx, $PM_{10}$, and $PM_{2.5}$ for long-term operation and would cumulatively contribute to the nonattainment designations of the SCAB. Therefore, the proposed FFTOD Specific Plan's air pollutant emissions would be cumulatively considerable and therefore significant and unavoidable.

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# 3.3 CULTURAL RESOURCES

This section addresses the potential impacts of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) on cultural and paleontological resources in the Florence-Firestone community. This section describes the environmental setting for cultural and paleontological resources, the applicable regulatory framework, impacts of the project, and mitigation measures to reduce significant impacts. The analysis in this section is based in part on the Cultural Resources Technical Report (Appendix C).

Cultural resources are defined as prehistoric and historic sites, structures, districts, and landscapes, or any other physical evidence associated with human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or any other reason. Under the California Environmental Quality Act (CEQA), although not associated with past human activity, paleontological resources are included under cultural resources. For analysis purposes, cultural resources may be categorized into four groups: archaeological resources, historic resources (including architectural/engineering resources), Native American resources (although these may also be considered subsets of archaeological or historic resources), and paleontological resources.

Archaeological resources are places where human activity has measurably altered the earth or left deposits of physical remains. Archaeological resources may be either prehistoric-era (before European contact) or historic-era (after European contact). The majority of such places in California are associated with either Native American or Euro-American occupation of the area. The most frequently encountered prehistoric or historic Native American archaeological sites are village settlements with residential areas and sometimes cemeteries; temporary camps where food and raw materials were collected; smaller, briefly occupied sites where tools were manufactured or repaired; and special-use areas such as caves, rock shelters, and rock art sites. Historic-era archeological sites may include foundations or features such as privies, corrals, and trash dumps.

Historic resources include standing structures, infrastructure, and landscapes of historic or aesthetic significance that are generally 50 years of age or older. In California, historic resources considered for protection tend to focus on architectural sites dating from the Spanish Period (1529-1822) through World War II and post-war era facilities; however, some resources may have achieved significance within the past 50 years if they meet the criteria for exceptional significance. Historic resources are often associated with archaeological deposits of the same age.

## 3.3.1 Environmental Setting

### 3.3.1.1 Paleontological Setting

The entire FFTOD Specific Plan Area is mapped as Quaternary alluvium (Qa). This geologic unit consists of unconsolidated alluvial gravel, sand, and clay, mostly eroded from the Santa Monica Mountains and deposited by the Los Angeles River and its tributaries (Dibblee and Minch 2007; Jennings 1962). These younger Quaternary deposits date to the Holocene and are therefore too young to typically contain significant fossil deposits. Recent younger Quaternary alluvial deposits in the Los Angeles Basin can be up to 200 feet thick (Yerkes et al. 1965).

Older Quaternary alluvial deposits are anticipated to exist below the younger Quaternary alluvium at unknown depths. These deposits are not easily differentiated from the recent deposits that overlie

them. Undisturbed older Quaternary alluvial deposits have yielded significant fossils throughout the Los Angeles Basin, including microfossils and fossil megafauna. Older Quaternary alluvial deposits close to the surface are typically considered of low sensitivity for significant fossils due to chemical and mechanical weathering, bioturbation, and anthropogenic disturbances. However, the sensitivity of undisturbed older Quaternary alluvial deposits for significant fossils is considered moderate to high, even at moderate depths, and increases with depth.

### 3.3.1.2 Cultural Setting

#### Prehistoric Setting

Southern California is known to have been inhabited by native peoples at least 13,000 years Before Present (B.P.) (Arnold et al. 2004). The first evidence of human occupation in the Los Angeles area dates to at least 9000 B.P. and is associated with a period known as the Millingstone Cultural Horizon (Wallace 1955; Warren 1968). Millingstone populations established permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating after 5000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3500 B.P., a number of socioeconomic changes occurred which are associated with the period known as the Intermediate Horizon (Erlandson 1994; Wallace 1955; Warren 1968). Increasing population size required new technological innovations, such as the circular shell fishhook, the mortar and pestle, dart and atlatl, to maximize extraction of terrestrial and marine resources, resulting in a more diverse hunting capability (Erlandson 1994). The Intermediate Horizon marks a period during which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and nonutilitarian materials were acquired, and travel routes were extended.

The Late Prehistoric period, spanning from approximately 1500 B.P. to the Spanish mission era, is the period associated with the florescence of contemporary Native American groups. Native American villages were reported to have been most abundant near major rivers. But historically the region's major rivers frequently shifted their channels due to seasonal flooding as they wound through the Los Angeles Basin (Gumprecht 1999). A relict channel of the Los Angeles River, known in the nineteenth century as Arroyo del Pueblo, appears on the 1896 Downey 1:62500 United States Geological Survey (USGS) map less than 0.75-mile east of the FFTOD Specific Plan Area (USGS 1896).

The closest documented ethnohistoric site to the FFTOD Specific Plan Area is Tajauta. Tajauta is believed to have been a rancheria or small village situated beside a spring on what later became the Rancho Tajauta. The place name is associated with a landform consisting of a low rise between two watercourses on which three Native American archaeological sites have been documented. The Anastasio Avila adobe was also formerly situated on this landform, on the approximate location of today's Imperial Courts public housing complex, in the Watts neighborhood of the City of Los Angeles. The landform overlapped the boundary of the Cities of Lynwood, Los Angeles, and South Gate, and unincorporated Los Angeles County. The northernmost part of the landform

is approximately 0.5-mile south of the southern boundary of the FFTOD Specific Plan Area (Beherec 2020:88-91; King 1993; McCawley 1996:57).

## Historic Setting

### *Spanish Period*

Spanish explorers made brief visits to Gabrielino territory in both 1542 and 1602; on both occasions, the two groups exchanged trade items. Sustained contact with Europeans did not commence until after 1769, when Gaspar de Portolá and a small Spanish contingent explored the California coast from San Diego to Monterey. A string of 21 missions was established in the years that followed the Portolá expedition, including Mission San Gabriel Archangel in 1771 and Mission San Fernando Rey in 1797. By the early 1800s, the majority of the surviving Gabrielino population had entered the mission system.

On September 4, 1781, El Pueblo de La Reina de Los Angeles was established; by 1786, the flourishing pueblo attained self-sufficiency, and funding by the Spanish government ceased (Gumprecht 1999). While the Spanish missions and pueblos developed in the 1780s, the Spanish crown also rewarded land grants to veterans of the California occupation army. Between 1784 and 1821, the development of ranchero society and land use under the Spanish distributed some of the best agricultural and ranching lands in California to private individuals. At least 30 ranchos and land concessions were granted, under conditions of settlement to occupy and use the land (Robinson 1948). The first was the 75,000-acre Rancho San Pedro, provisionally granted to Juan Jose Dominguez in 1784.

### *Mexican Period*

Alta California became a state when Mexico won its independence from Spain in 1821. The authority of the California missions gradually declined, culminating with their secularization in 1834. Native Americans who had become dependent on the missions were disenfranchised and most Gabrielino neophytes either fled to the north or sought work as laborers from nearby private landowners. Former mission lands were quickly divided and granted to private citizens for use as agricultural and pastoral land (Reid 1939 [1852]).

After 1834, the subdivision of lands into ranchos accelerated. As the possibility of a takeover of California by the United States (U.S.) loomed in the 1840s, Governor Pio Pico increased the number of land grants in a last-ditch effort to keep the land in Mexican hands. More than 600 rancho grants were made between 1833 and 1848.

In 1843, Governor Manuel Micheltorena granted one square league of land, including what would become Watts and Willowbrook, to Anastasio Avila (or Abila). As finally confirmed by the terms of the Treaty of Guadalupe Hidalgo, the grant was bounded roughly by the present-day streets of Manchester Avenue/Firestone Boulevard to the north, Rosecrans Boulevard to the south, Central Avenue to the west, and Alameda Street to the east; therefore, the area partially overlapped the FFTOD Specific Plan Area. The actual land grant was much larger and extended from the western border of Lugo's Rancho San Antonio all the way to the eastern border of Rancho Sausal Redondo in modern-day Inglewood, the property of Anastasio Avila's son, Antonio Ygnacio Avila. A surviving Diseño del Rancho Tajauta shows that, as it was originally granted, the rancho included

the heights in the vicinity of today's Westmont and West Athens (Adler 1977; U.S. District Court [California: Southern District] 1854).

### *American Period*

The U.S. took control of California after the Mexican–American War of 1846 and seized Monterey, San Francisco, San Diego, and Los Angeles (then the state capital) with little resistance. Local unrest soon bubbled to the surface, and Los Angeles slipped from U.S. control in 1847. Hostilities officially ended with the signing of the Treaty of Guadalupe Hidalgo in 1848; the U.S. agreed to pay Mexico $15 million for the conquered territory that included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. The conquered territory represented nearly half of Mexico's pre-1846 holdings. California joined the U.S. in 1850 as the 31st state (Wilkman and Wilkman 2006:15).

The discovery of gold in California led to an enormous influx of American citizens in the 1850s and 1860s, and these settlers rapidly displaced the old rancho families. Newcomers continued to pour into Los Angeles and the population nearly doubled between 1870 and 1880. The completion of the second transcontinental line, the Santa Fe, took place in 1886 causing a fare war that drove fares to an unprecedented low. More settlers continued to head west and the demand for real estate skyrocketed. The city's population rose from 11,000 in 1880 to 50,000 by 1890 (Meyer 1981:45).

The beginning of the twentieth century saw the florescence of a uniquely suburban metropolis, where a vast network of residential communities overshadowed city centers, the single-family home was valued over the high-rise, and private space took precedence over public space (Hawthorne 2006). The pleasant Mediterranean climate and development of industries, including the war industry and the movie industry, brought jobs and people to the greater Los Angeles area. Inexpensive automobiles gained popularity in the 1920s, soon creating tremendous congestion in the centers of cities and necessitating alternate transportation routes. The Arroyo Seco Parkway, connecting Los Angeles to Pasadena, was among the earliest "express auto highways" in the U.S., opening in December 1940 (Balzar 2006). Dozens of freeways were constructed in the post-war era, radically altering the character of Los Angeles by simultaneously dividing local neighborhoods and connecting outlying communities.

During the first 3 decades of the twentieth century, more than 2 million people moved to Los Angeles County, transforming it from a largely agricultural region into a major metropolitan area. By 1945, Los Angeles had undertaken 95 annexations, expanding from a 28-square-mile agrarian pueblo into a densely populated city covering more than 450 square miles (Robinson 1979:245).

### *Florence-Firestone Community History*

The following is excerpted from the 2019 *Florence-Firestone Community Plan* (County of Los Angeles 2019):

> *Turn of the Century*
>
> The area that is now Florence-Firestone once contained farmland that yielded abundant crops of sweet potatoes, grain, and corn watered by artesian wells. Grape vineyards were common, as were eucalyptus groves planted for firewood. Farms in the area ranged in size from 40 to several hundred acres.

In 1869, a rail line paralleling Alameda Street from Los Angeles to Wilmington was completed by the Southern Pacific Railroad. In 1876, the trans-continental rail line was completed, connecting the area to the nationwide rail system. The unincorporated districts of Florence and Graham were established as outposts along these rail lines. Southern Pacific and Pacific Electric Railroads had stops along Florence Avenue and Graham Avenue. The name Florence- Firestone may have originated from these outposts. In 1877, the first post office in Florence-Firestone was established. With the construction of the Pacific Electric inter-urban line red cars, which ran from Los Angeles to Long Beach along Graham Avenue, the area had additional regional rail connections by 1902.

Development initially occurred around the rail and streetcar lines. During the 1800s and early 1900s, development was concentrated between Compton Avenue and Alameda Street. In the 1920s, the community started spreading eastward and westward and was almost completely built out by the 1940s. The 1960 Census indicated that 72% of all housing in the community was constructed before 1940. Many of the structures built between the 1920s and 1940s remain today.

Portions of Florence-Firestone have, in previous times, been identified by different place names. Graham, Starks Palm, Central Gardens, Roosevelt Park, Gage-Holmes and Firestone Park Zoned Districts were all named after previously existing neighborhoods in Florence-Firestone. Watts, an adjacent community to the south, was incorporated as an independent city in 1907 and was annexed to the City of Los Angeles in 1926.

*Early 1900's*

The rail line and proximity to ocean ports made Florence-Firestone and its surrounding areas an ideal location for factories, with abundant manufacturing jobs in the early 1920s. Goodyear Tire Company opened in 1920 on Central Avenue in the City of Los Angeles near the community's boundary. In 1927 Firestone Tire and Rubber Manufacturers opened a plant at the intersection of Firestone Boulevard and Alameda Street in South Gate also near the community's boundary.

At its peak, Goodyear Tire employed over 2,500 people and operated 24 hours a day. In addition to the tire and rubber plants, steel manufacturers, automobile assembly plants, derrick and equipment companies, and other manufacturing companies provided a variety of good jobs for the community. This in turn supported a vibrant commercial district, with three movie theaters opening in the community in the 1930s, two on Florence Avenue and one on Compton Avenue. The onset of World War II brought additional manufacturing jobs to the area with the growth of the defense industry. However, after World War II the defense industry declined and manufacturers transitioned to the auto industry.

*Post War II Years*

In 1948, the "whites-only" housing covenants were lifted in the Los Angeles area and African-Americans began to purchase and rent homes in the recently desegregated parts of the community. Racial tensions began to grow, eventually

leading to violence in the 1950's when white residents bombed, fired into, or burned crosses on the lawns of African-Americans' homes. In response, African-American boys formed clubs for protection and the first gangs were established.

In the 1960s, the community was affected by deindustrialization. Factories began to move to outlying areas where there was more space, cheaper land, and less of the perceived social ills of the urban core. Residents and retail establishments followed, resulting in lower rents in the community. The job base, once supported by a strong manufacturing presence, shifted increasingly to lower-wage, service-sector jobs with less stable local employment options. At the same time, the community underwent its first major demographic shift.

Between 1950 and 1965 the African-American population increased from 18% to 57% of the total population. The 1960s was also a time of civil unrest surrounding the Civil Rights Movement and protest against the Vietnam War. In Los Angeles, racial tensions stemming from racial injustices, discrimination, and economic hardship led to the Watts Riot of 1965.

*Recent Development*

Deindustrialization continued into the 1970s and 1980s, resulting in widespread unemployment in the area. The Goodyear and Firestone plants closed in 1982, leading to a massive loss of jobs.

In the 1980s and 1990s, there were significant population shifts in Florence-Firestone spurred by immigration from South and Central America. People of Hispanic origin represented 61% of the population in 1980, 77% in 1990, 86% in 2000, and 91% in 2016. The African-American population in Florence-Firestone declined from 60% in the 1960s to 9% by 2016.

The commercial and industrial makeup of the community changed as well. Unable to compete with new, outlying industrial parks in suburban locations, industry and jobs continued to decline. Physical constraints, such as narrow or shallow lot depths, and competition from large shopping malls further contributed to the decline of Florence-Firestone's historical commercial corridors. The effects can still be seen today with an increasing vacancy rate, closed storefronts, vacant lots, and abandoned buildings. Although, the lower commercial rents have enabled the establishment of small, locally-owned businesses.

Florence-Firestone has been the subject of several studies and reports conducted by Los Angeles County, dating back to the 1970s. In 1970 and 1971, the community was one of two Model Neighborhoods under Los Angeles County's Model Cities program administered by the Department of Urban Affairs. This program sought to coordinate urban services. A community plan background study and staff report was developed in 1971, with the intention to adopt a community plan. However, the community plan was not adopted at the time, perhaps due to the proposal to construct two freeways through the community, the east-west Route 90 along Slauson Avenue and the north-south Route 47 along Industrial Avenue. These freeways were not built and the community plan was also not finalized.

In 1990, the Los Angeles Metropolitan Transit Authority (MTA) opened the 22-mile Metro A Line (previously Metro Blue Line), connecting Downtown Los Angeles and the City of Long Beach. The Metro A Line is the system's first and longest rail line. The Metro A Line runs through the community, with three stops located at Slauson, Florence, and Firestone. The line provides an important north-south connection to jobs and opportunities throughout the Los Angeles region. At a total cost of $877 million, the Metro A Line represents the most recent major infrastructure investment in the community.

In 1992, South Central Los Angeles was affected by civil unrest that occurred in part as a response to the acquittal of four police officers accused of beating Rodney King. The six days of unrest that followed were also a result of widespread structural inequalities, including economic disparity, poverty, high unemployment, as well as a nationwide recession and breakdown of social institutions. In Florence-Firestone, several businesses suffered considerable damage, with losses concentrated heavily in commercial areas along major corridors, especially on Florence and Central Avenues.

In 2002, in an effort to improve services to the community, Los Angeles County formed the Florence-Firestone Community Enhancement Team (FFCET). Comprised of staff from various County agencies, collaborators from the community, nonprofit organizations, and other stakeholders, the FFCET sought to provide integrated services and prioritize service enhancements. The FFCET provided a forum for community members and County service providers to come together to discuss issues, identify solutions, and work together for the betterment of the community. Completed projects initiated by the FFCET include: expansion of park youth programs; initiation of a Sheriff's Special Enforcement Team to abate gang violence; publication of a resource guide, the Community Connection; coordination of street sweeping, garbage collection, and parking enforcement; installation of roadway and pedestrian lighting and 1,450 new street name signs; formation of the first unincorporated area Business Improvement District; formation of a Community Standards District; and enhancement of code enforcement efforts.

In 2010, the County opened the newly renovated Florence-Firestone Service Center. The center provides comprehensive social services to neighborhood residents which include elderly care, emergency food assistance, internship opportunities, and mediation and conflict resolution. Many County departments and other public and private agencies have satellite offices at the center.

The Black community in Los Angeles has been shaped and reshaped by successive influxes of migrants from other states since 1781 (City of Los Angeles 2018). Though remaining a small part of the total Los Angeles population, from 1890 to 1900 the Black population grew by almost 40% from 1,258 to 2,131 as the general population grew by almost 51% to 102,479 (City of Los Angeles 2018).

In the 1950s, the identity of the area south of downtown transitioned from multiethnic/multiracial eastside to nearly all-Black (Grimes 2009). Middle-class Blacks began moving out of the Central

Avenue vicinity into contiguous neighborhoods to the west and south to what became commonly known as “South Central" (Grimes 2009). This area included the neighborhoods of Avalon, South Vermont, and Watts, and the unincorporated communities of Florence, Westmont and Willowbrook. In the 1950s, the Blacks who settled here were both blue-collar and professionals (Grimes 2009). South Central Los Angeles was historically at the heart of the Black community in Los Angeles (Taniguchi 2004). Central Avenue was considered a hot spot for the jazz scene during its heyday from the 1920s to the 1950s (Taniguchi 2004). The construction of the Harbor Freeway starting from the mid-1950s contributed to changes to the tight-knit nature of the community and an economic downturn for the area.

By the 1970s, many of the blue-collar jobs in South Central closed due to international competition and the employment opportunities they once provided moved overseas or disappeared (City of Los Angeles 2018). The narrowing of industrial employment impacted all American workers but especially Black workers (City of Los Angeles 2018). New manufacturing jobs were developing but because of the continued housing discrimination in the suburbs, inadequate training and education, and poor transportation, the economic opportunities for many working-class Blacks were stymied (City of Los Angeles 2018). Their segregation became more entrenched in the neighborhoods of South Los Angeles (City of Los Angeles 2018).

### *Florence-Firestone Community Resource Types*

The FFTOD Specific Plan Area largely comprises single-family residential neighborhoods. The neighborhoods in Florence and Graham/ Firestone Park feature concentrations of early twentieth century single-family residences interspersed with commercial and industrial corridors. These neighborhoods developed primarily due to their proximity to historic streetcar routes. Though they were near streetcar lines, these neighborhoods often featured accommodation for automobiles, such as detached garages and paved driveways.

Many of the residential buildings in the FFTOD Specific Plan Area have been altered over time with changes such as replacement windows and doors, stucco finish over original wall cladding materials, and the removal of features such as window surrounds and trim.

Multifamily residences in the FFTOD Specific Plan Area are intermittently situated in predominantly single-family residential neighborhoods. Multifamily development typically consists of duplexes, fourplexes, and small apartment buildings. Scattered throughout the FFTOD Specific Plan Area are bungalow courts from the early twentieth century, designed in a variety of popular architectural styles including craftsman and mission revival.

Commercial property types are found on the major thoroughfares running north-south along Compton Avenue and east-west along Slauson Avenue, Florence Avenue, Nadeau Street, and Firestone Boulevard. The commercial buildings included one- and two-story commercial block buildings and mid-twentieth century storefronts. The historic-period industrial development in the FFTOD Specific Plan Area is largely concentrated along Maie Avenue and Wilmington Avenue and includes factories, warehouses, and storage sites.

The FFTOD Specific Plan Area also has a number of institutional property types. These properties include churches, schools, and government buildings such as the Century Sheriff’s Youth Activity League, the Los Angeles County Probation Building, and the Los Angeles County Department of Public Social Services.

### 3.3.1.3 Existing Cultural Resources

#### Records Search Results

A records search for the FFTOD Specific Plan Area was conducted on May 13, 2021, at the California Historical Resources Information System South Central Coastal Information Center (SCCIC) at the California State University, Fullerton. The records search included a review of all recorded resources including archaeological sites and built-environment resources within the entire FFTOD Specific Plan Area, as well as a review of cultural resource reports on file. The archival research included review of previously recorded archaeological site records and reports, historic site and property inventories, and historic maps. Inventories of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Office of Historic Preservation's Built Environment Resources Directory (BERD), California Historical Landmarks and Points of Interest, and the list of City of Los Angeles Historic-Cultural Monuments (LAHCMs) were also reviewed to identify cultural resources within the FFTOD Specific Plan Area.

#### *Previous Cultural Resources Investigations Reports*

A total of 44 previous cultural resources investigations documented at the SCCIC have been conducted in the FFTOD Specific Plan Area (Table 3.3-1). These investigations include surveys, records searches, and submissions.

**Table 3.3-1: Previous Cultural Resources Investigations Conducted within the FFTOD Specific Plan Area**

| Author | Report # | Title | Date |
|---|---|---|---|
| Wlodarski, Robert J. | LA-02577 | Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County California | 1992 |
| Wlodarski, Robert J. | LA-02644 | Results of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California | 1992 |
| Anonymous | LA-02950 | Consolidated Report: Cultural Resources Studies for the Proposed Pacific Pipeline Project | 1992 |
| Maki, Mary K | LA-03036 | A Phase 1 Cultural Resources Survey of 0.66-acre at 2004 E. 88th Street, Los Angeles County, California | 1994 |
| Maki, Mary K | LA-04004 | Negative Phase 1 Archaeological Survey for the 2nd District Infill Housing Project/ #g89203 at 6024 South Hooper Avenue, Los Angeles County, California | 1998 |
| Anonymous | LA-04097 | Council District Nine Revitalization/recovery Program Final Environmental Impact Report | 1995 |
| Unknown | LA-04470 | Negative Phase I Archaeological Survey and Impact Assessment of .65 Acre for the Latchford Glass Phase II Project Los Angeles County, California | 1999 |
| Starzak, Richard | LA-04625 | Historic Property Survey Report for the Proposed Alameda Corridor from the Ports of Long Beach and Los Angeles to Downtown Los Angeles in Los Angeles County, California | 1994 |
| Maki, Mary K. | LA-04737 | Negative Phase I Archaeological Survey and Impact Assessment of .9 Acres for the 7300 Roseberry Avenue Housing Project CDC Project No. JJ7101, HMD001, G89101, Florence, Los Angeles County, California | 1999 |
| Ashkar, Shahira | LA-04834 | Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, LA and Orange Counties | 1999 |

| Author | Report # | Title | Date |
|---|---|---|---|
| Science Applications International Corporation | LA-04836 | Phase 1 Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project | 2000 |
| Maki, Mary K. | LA-05572 | Negative Phase 1 Archaeological Survey and Impact Assessment of Approximately 0.5 Acre for the Holmes Childcare Center Project 6122 Holmes Avenue Florence, Los Angeles County, California | 2000 |
| Wells, Helen Fairman | LA-05577 | Phase 1 Cultural Resources Investigation of Franklin Delano Roosevelt Park Los Angeles County, California | 1996 |
| Duke, Curt | LA-05685 | Cultural Resource Assessment Cingular Wireless Facility No. Sm 066-03 Los Angeles County, California | 2002 |
| Maki, Mary K. | LA-07059 | Phase 1 Archaeological Survey Report of 1.64 Acres for the Gage Village Housing Development Project Gage Avenue, Florence, Los Angeles County, California | 2003 |
| Marvin, Judith and Curt Duke | LA-07068 | Cultural Resource Assessment AT&T Wireless Services Facility No. 04095a Los Angeles County, California | 2002 |
| Bonner, Wayne H. | LA-07405 | Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate LA60XC157A (Florence Verizon) 7200 South Central Avenue, Los Angeles, Los Angeles County, California | 2004 |
| Bonner, Wayne H. | LA-07625 | Cultural Resources Records Search and Site Visit Results for Sprint Facility Candidate LA70XC112B (Mercado Del Pueblo), 6270 Wilmington Avenue, Los Angeles County, California | 2005 |
| Bonner, Wayne H. | LA-07627 | Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate LA60X180C (Mitchell) 7702 Maie Avenue, Los Angeles, Los Angeles County, California | 2004 |
| Bonner, Wayne H. | LA-07637 | Cultural Resources Records Search Results and Site Visit for T-Mobile USA Candidate LA03051A (California Body Shop), 9303 South Alameda Street, Los Angeles, Los Angeles County, California | 2006 |
| Bonner, Wayne H. | LA-07638 | Cultural Resources Records Search Results and Site Visit for T-Mobile USA Candidate LA03341C (Naomi SCE Substation), 7101 Compton Avenue, Los Angeles, Los Angeles County, California | 2006 |
| Bonner, Wayne H. | LA-07643 | Records Search, Site Visit, and Direct and Indirect Historic Architectural Assessment for Cingular Telecommunications Facility Candidate SM-341-03 (Jems Ent Building) 1560 East Florence Avenue, Los Angeles, Los Angeles County, California | 2004 |
| Maki, Mary K. | LA-07665 | CDC-Slauson Station Apartments | 2005 |
| Maki, Mary K. | LA-07667 | Phase 1 Archaeological Investigation of 18.3 Acres for the Florence & Alameda Commercial Center Project Walnut Park, Los Angeles County, California | 2004 |
| Maki, Mary K. | LA-07671 | Phase 1 Archaeological Investigation of 0.34 Acre for the 6305 Holmes Avenue Construction Project Florence, Los Angeles County, California | 2004 |
| Bonner, Wayne H. | LA-07703 | Indirect APE Historic Architectural Assessment for Sprint Telecommunications Facility Candidate LA60XC157A (Florence Verizon) 7200 South Central Avenue, Los Angeles, Los Angeles County, California | 2004 |
| Tang, Bai "Tom", Michael Hogan, and Casey Tibbet | LA-07867 | Historic-period Building Survey South Region High School #2 Project in an Unincorporated Area Near the City of Los Angeles, Los Angeles County, California | 2005 |
| Livingstone, David M., McDougall, Dennis, Goldberg, Susan K., and Nettles, Wendy M. | LA-07952 | Trails to Rails: Transformation of a Landscape: History and Historical Archaeology of the Alameda Corridor Volume 1 | 2006 |

| Author | Report # | Title | Date |
|---|---|---|---|
| Bonner, Wayne H. and Kathleen A. Crawford | LA-07987 | Direct Ape Historic Architectural Assessment for T-Mobile USA Candidate LA03341C (Naomi SCE Substation), 7101 Compton Avenue, Los Angeles, Los Angeles County, California | 2006 |
| Arrington, Cindy and Nancy Sikes | LA-08255 | Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II | 2006 |
| Shaver, Noelle C.S. | LA-08499 | A Phase I Archaeological Study for the South Region High School No. 13, Community of Walnut Park, Unincorporated Los Angeles County, California | 2007 |
| Bonner, Wayne H. | LA-08766 | Cultural Resources Records Search and Site Visit Results for Global Signal Candidate 3019372 (Salome), Located at 1150 East 58th Place, Los Angeles, Los Angeles County, California | 2006 |
| Bonner, Wayne H. | LA-08853 | Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA13082A (Leon Elster), 8145 Beach Street, Los Angeles, Los Angeles County, California | 2006 |
| King, Phil V. | LA-08955 | Final Report for Year Three Historical and Cultural Resources Survey of Los Angeles: Sylmar, Watts, Crenshaw, and Vermont/ Slauson | 1983 |
| Bonner, Wayne H. | LA-09190 | Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA03051D (SCE Caldon), Near 8866 Juniper Street, Southeast Corner of 88th Street and Juniper Street, Los Angeles, Los Angeles County, California | 2007 |
| Maki, Mary K. | LA-09640 | Alameda Seniors Housing Project, Huntington Park | 2008 |
| Smith, Francesca and Caprice D. Harper | LA-09641 | Cultural Resources Initial Technical Report and Phase I Site Investigation Proposed South Region Middle School No. 3 Project, Walnut Park, Los Angeles County, California | 2008 |
| Smith, Francesca and Caprice D. Harper | LA-09642 | Cultural Resources Intensive Survey Report, Proposed South Region Middle School No. 3 Project, Walnut Park, Los Angeles County, California | 2008 |
| Horne, Melinda C., M. Colleen Hamilton, and Susan K. Goldberg | LA-10524 | Alameda Corridor Project Treatment Plan for Historic Properties Discovered During Project Implementation, Second Draft. Addendum to Finding of Effect (February 21, 1995: October 27, 1998) | 2000 |
| Brunzell, David | LA-10593 | Cultural Resources Assessment – Jordan Downs Specific Plan Project, Watts Community of Los Angeles, California | 2010 |
| Lewicki, Pauline | LA-11754 | Wattstar Theater and Education Center Addendum to the Initial Study/Mitigated Negative Declaration, Community Redevelopment Agency of the City of Los Angeles | 2010 |
| Brunzell, David | LA-11755 | Cultural Resources Assessment Wattsatr Cinema and Education Center Project Watts Community of Los Angeles, California | 2010 |
| Shaffer, Caleb | LA-11966 | Consultation Under Section 106 of the National Historic Preservation Act of a Federal Permitting Project at Clean Harbors Los Angeles | 2012 |
| Anderson, Katherine | LA-12798 | Los Angeles Unified School District Five Campus Building Inventory, City of Los Angeles, California | 2014 |

### *Previously Recorded Cultural Resources*

The SCCIC records search identified 59 previously recorded cultural resources mapped in the FFTOD Specific Plan Area (Table 3.3-2). Of these resources, five are archaeological resources including historic-period building foundations and refuse deposits.

**Table 3.3-2: Previously Recorded Cultural Resource Sites in the FFTOD Specific Plan Area**

| Primary Number (P-19-) | Historic Name/ Description | Construction Date / Time Period | Date Originally Recorded | Eligibility / NRHP Status Code |
|---|---|---|---|---|
| 002838 | Historic-period brick foundation or footing | 1880-1945 | 2000 | Unevaluated |
| 002839 | Historic-period refuse deposit | 1880-1945 | 2000 | Unevaluated |
| 002840 | Historic-period brick foundation or footing | 1880-1945 | 2000 | Unevaluated |
| 002847 | Historic-period brick foundation or footing | 1880-1945 | 2000 | Unevaluated |
| 002856 | Historic-period refuse deposit | 1914-1945 | 2000 | Unevaluated |
| 176186 | Miramonte Elementary School | 1936-1937 | 1996 | NRHP eligible / 2S2 |
| 186110 | Union Pacific Railroad | 1905 | 1999 | NRHP eligible / 3S |
| 187085 | The Mojave Road | Prehistoric/historic | 1985 | NRHP eligible / 1CS |
| 187087 | Pacific Electric Railway Firestone Boulevard Grade Separation/ Graham Avenue Underpass | 1937 | 1986 | Not Eligible / 7P |
| 187500 | Spanish Colonial Revival style commercial property | 1947 | 2004 | Not eligible / 6Y |
| 187700 | Streamline Moderne commercial property | 1941 | 2004 | Not eligible / 6Y |
| 187755 | Spanish Eclectic style multiple-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187756 | Neoclassical style single-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187757 | Neoclassical style single-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187758 | Modern style multiple-family property | c. 1949 | 2005 | Not eligible / 6Z |
| 187759 | Modern style multiple-family property | c. 1940 | 2005 | Not eligible / 6Z |
| 187760 | Queen Anne style single-family property | 1903 | 2005 | Not eligible / 6Z |
| 187761 | Spanish Eclectic style multiple-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187762 | Modern style multiple-family property | c. 1955 | 2005 | Not eligible / 6Z |
| 187763 | Spanish Eclectic style multiple-family property | c. 1929 | 2005 | Not eligible / 6Z |
| 187764 | Spanish Eclectic style multiple-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187765 | Modern style multiple-family property | 1955 | 2005 | Not eligible / 6Z |
| 187766 | Craftsman style multiple-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187767 | Folk Victorian single-family property | c. 1902 | 2005 | Not eligible / 6Z |
| 187768 | Spanish Eclectic style single-family property | c. 1923 | 2005 | Not eligible / 6Z |

| Primary Number (P-19-) | Historic Name/ Description | Construction Date / Time Period | Date Originally Recorded | Eligibility / NRHP Status Code |
|---|---|---|---|---|
| 187769 | Craftsman style single-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187770 | Spanish Eclectic style multiple-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187771 | Vernacular multiple-family property | c. 1923 | 2005 | Not eligible / 6Z |
| 187772 | Spanish Eclectic style multiple-family property | c. 1927 | 2005 | Not eligible / 6Z |
| 187773 | Vernacular with Italianate influences multiple-family property | c. 1927 | 2005 | Not eligible / 6Z |
| 187774 | Vernacular commercial property | c. 1948 | 2005 | Not eligible / 6Z |
| 187775 | Vernacular commercial property | c. 1946 | 2005 | Not eligible / 6Z |
| 187776 | Vernacular with Western false front commercial property | c. 1947 | 2005 | Not eligible / 6Z |
| 187777 | Vernacular commercial property | c. 1932 | 2005 | Not eligible / 6Z |
| 187778 | Vernacular commercial property | c. 1920 | 2005 | Not eligible / 6Z |
| 187779 | Vernacular with Western false front commercial property | c. 1925 | 2005 | Not eligible / 6Z |
| 187780 | Vernacular commercial property | c. 1925 | 2005 | Not eligible / 6Z |
| 187781 | Vernacular commercial property | c. 1928 | 2005 | Not eligible / 6Z |
| 187782 | Vernacular with Western false front commercial property | c. 1920 | 2005 | Not eligible / 6Z |
| 187783 | Vernacular commercial property | 1948 | 2005 | Not eligible / 6Z |
| 187784 | Vernacular commercial property | c. 1949 | 2005 | Not eligible / 6Z |
| 187785 | Vernacular with Mission style influences | c. 1924 | 2005 | Not eligible / 6Z |
| 187786 | Western Barn with Art Deco influence commercial property | c. 1938 | 2005 | Not eligible / 6Z |
| 187787 | Vernacular commercial property | c. 1925 | 2005 | Not eligible / 6Z |
| 187788 | Vernacular commercial property | c. 1942 | 2005 | Not eligible / 6Z |
| 187789 | Vernacular with Art Deco influence commercial property | c. 1924 | 2005 | Not eligible / 6Z |
| 187790 | Vernacular commercial property | 1946 | 2005 | Not eligible / 6Z |
| 187791 | Vernacular commercial property | c. 1949 | 2005 | Not eligible / 6Z |
| 187792 | Vernacular commercial property | c. 1952 | 2005 | Not eligible / 6Z |
| 187793 | Mission Revival style multiple-family property | c. 1923 | 2005 | Not eligible / 6Z |
| 187864 | Modern style commercial property | 1942 | 2004 | Not eligible / 6Y |
| 187865 | Modern style commercial property | c. 1958 | 2004 | Not eligible / 6Y |
| 187965 | Art Moderne style substation | c. 1929 | 2006 | Not eligible / 6Y |
| 188399 | Colonial Revival style single-family property | 1926 | 2008 | Not eligible / 6Z |
| 188400 | Spanish Eclectic style single-family property | 1939 | 2008 | Not eligible / 6Z |
| 188779 | Jordan Downs Public Housing Project, multiple-family property | 1942-1954 | 2010 | Not eligible / 6Y |

| Primary Number (P-19-) | Historic Name/ Description | Construction Date / Time Period | Date Originally Recorded | Eligibility / NRHP Status Code |
|---|---|---|---|---|
| 188983 | Boulder Dam – Los Angeles 287.5kV Transmission Line | 1936-1953 | 1999 | NRHP eligible / 2B |
| 190949 | Paul R. Williams/ Parkside Manor Historic District | 1944-1952 | n.d. | NRHP eligible |
| 190953 | Graham Elementary School | 1925-1968 | 2014 | Not eligible / 6Z |

Notes:
CRHR = California Register of Historical Resources
NRHP = National Register of Historic Places
1CS = Individually listed in the CRHR by the State Historical Resources Commission.
2B = Determined eligible for NRHP both individually and as a contributor to a NRHP eligible multi-component resource like a district in a federal regulatory process. Listed in the CRHR.
2S2 = Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR.
3S = Appears eligible for NRHP individually through survey evaluation.
6Y = Determined ineligible for NRHP by consensus through Section 106 process. Not evaluated for CRHR or local listing.
6Z = Found ineligible for NRHP, CRHR or local designation through survey evaluation.
7P = California State Point of Historical Interest that does not meet CRHR criteria.
c. = circa

Of the 59 previously recorded cultural resources, the SCCIC records search identified five NRHP eligible resources within the FFTOD Specific Plan Area. These resources are detailed below:

- Miramonte Elementary School (P-19-176186)

  The Miramonte Elementary School main building and auditorium were identified in 1996 for their architectural significance (P-19-176186). The buildings were constructed in 1936 and 1937 in the Mediterranean revival style designed by the architectural firm Howell and Winslow. The resource is eligible for the NRHP and is listed in the CRHR.

- Union Pacific Railroad (P-19-186110)

  The Union Pacific Railroad was constructed between 1869 and 1905 and includes portions of the first transcontinental railroad and is significant for its association with the development of Los Angeles (P-19-186110). For a separate project, in 2019, the State Historic Preservation Officer recommended that the Union Pacific Railroad (P-19-186110) as a whole should be assumed eligible for the NRHP (Feldman 2019). For the purpose of the analysis in this section, the Union Pacific Railroad is assumed eligible for the NRHP.

- Mojave Road (P-19-187085)

  The NRHP-eligible Mojave Road (P-19-187085) is the historic road that connected the U.S. Army Headquarters for Southern California and Arizona Territory at Wilmington, California with Fort Mojave, Arizona (California Registered Historical Landmark # 963). Within the FFTOD Specific Plan Area, the Mojave Road is generally along the alignment of the existing railroad.

- Boulder Dam – Los Angeles 287.5kV Transmission Line (P-19-188983)

  The Boulder Dam-Los Angeles 287.5 kV Transmission Line (P-19-188983) was evaluated for NRHP eligibility in 1999 and found eligible under Criteria A and C, significant for its association with the construction of Boulder Dam, as well as for its association with the industrial, economic, and urban development that occurred in metropolitan Los Angeles from

the mid-1930s through the 1940s. The resource is also significant for its unique engineering and structural characteristics.

- Paul R. Williams / Parkside Manor Historic District (P-19-190949)

  The Paul R. Williams / Parkside Manor Historic District (P-19-190949) was constructed between 1944 and 1952. The resource was found eligible for listing in the NRHP under Criteria A and C at the local level of significance as a unique example of community planning in the Watts area with residences designed by architect Paul R. Williams. The district is one of the first and only planned neighborhoods in the Watts area and was among the few developments in Los Angeles built to provide quality single-family housing for the Black community during World War II (HRG n.d.).

### Built Environment Resources Directory

The BERD provides information regarding non-archaeological resources. This inventory is organized by street; a total of 39 previously recorded built-environment resources were identified in the FFTOD Specific Plan Area (Table 3.3-3).

**Table 3.3-3: Properties in the BERD in the FFTOD Specific Plan Area**

| Primary Number (P-19-) | Historic Address | Construction Date / Time Period | Eligibility / NRHP Status Code |
|---|---|---|---|
| | 5833 MAKEE AVE | 1922 | Not eligible / 6U |
| | 6305 HOLMES AVE | - | Not eligible / 6U |
| | 6362 MAKEE AVE | 1905 | Not eligible / 6U |
| | 6608 MIRAMONTE BLVD | 1909 | Not eligible / 6U |
| 19-174467 | 6919 COMPTON AVE | - | Not eligible / 6Y |
| | 7000 COMPTON AVE | 1913 | Not eligible / 6U |
| | 4119 BELL AVE | 1928 | Not eligible / 6Y |
| | 1747 E FLORENCE AVE | 1933 | Not eligible / 6U |
| | 1583 E FLORENCE AVE | 1958 | Not eligible / 6Y |
| | 1600 E FLORENCE AVE | 1942 | Not eligible / 6Y |
| | 1560 E FLORENCE AVE | 1941 | Not eligible / 6Y |
| | 7313 COMPTON AVE | 1928 | Not eligible / 6U |
| | 1460 E 89TH ST | 1940 | Not eligible / 6Y |
| | 8908 MAIE AVE | 1974 | Not eligible / 6Y |
| 19-173460 | 1435 E 77TH PL | - | Not eligible / 6Y |
| 19-176488 | 1933 E 75TH ST | 1922 | Unevaluated |
| | 7700 WALNUT DR | 1921 | Not eligible / 6U |
| | 2056 E 76TH ST | 1914 | Not eligible / 6Y |
| | 7930 HOLMES AVE | 1923 | Not eligible / 6Y |
| 19-173498 | 8208 HOLMES AVE | - | Not eligible / 6Y |
| 19-174551 | 8227 WALNUT DR | 1923 | Not eligible / 6Y |
| 19-176487 | 8418 MIRAMONTE BLVD | 1923 | Unevaluated |
| 19-174476 | 1622 E 85TH ST | 1930 | Not eligible / 6Y |
| 19-176499 | 8708 FIR AVE | 1905 | Unevaluated |

| Primary Number (P-19-) | Historic Address | Construction Date / Time Period | Eligibility / NRHP Status Code |
|---|---|---|---|
| | 8908 MAIE AVE | 1974 | Not eligible / 6Y |
| 19-174380 | 9110 HOLMES AVE | 1910 | Not eligible / 6Y |
| 19-174573 | 1145 E 85TH ST | 1926 | Not eligible / 6Y |
| 19-175100 | 1120 E 81ST ST | 1939 | Not eligible / 6Y |
| 19-174533 | 1210 E 77TH PL | 1927 | Not eligible / 6Y |
| 19-174513 | 1234 E 73RD ST | 1926 | Not eligible / 6Y |
| 19-174637 | 1133 E 74TH ST | 1924 | Not eligible / 6Y |
| | 1130 E FLORENCE AVE | 1947 | Not eligible / 6Y |
| | 2118 E FLORENCE AVE | - | Not eligible / 6U |
| | 2122 E FLORENCE AVE | - | Not eligible / 6U |
| | 2126 E FLORENCE AVE | - | Not eligible / 6U |
| | 2134 E FLORENCE AVE | - | Not eligible / 6U |
| | 2136 E FLORENCE AVE | - | Not eligible / 6U |
| | 2140 E FLORENCE AVE | - | Not eligible / 6U |
| | 2200 E FLORENCE AVE | 1923 | Not eligible / 6U |

Notes:
APE = Area of Potential Effect
BERD = Built Environment Resources Directory
CRHR = California Register of Historical Resources
NRHP = National Register of Historic Places
OHP = Office of Historic Preservation
6U = Determined ineligible for NRHP pursuant to Section 106 without review by OHP.
6Y = Determined ineligible for NRHP by consensus through Section 106 process – Not evaluated for CRHR or local listing.
7R = Identified in Reconnaissance Level Survey or in an APE: Not evaluated.

### California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical interest. A search of the California Historical Landmarks list revealed no California Historic Landmarks within the FFTOD Specific Plan Area.

### Los Angeles Historic-Cultural Monuments (LAHCMs)

LAHCMs are sites in Los Angeles that have been designated by the Los Angeles Cultural Heritage Commission as worthy of preservation based on their architectural, historic, and cultural merits. A search of the LAHCMs revealed no LAHCMs in the FFTOD Specific Plan Area.

### Supplemental Research

In addition to the reports reviewed at the SCCIC, an additional cultural resources study, the *Florence-Firestone Community Atlas* (AECOM 2020) is incorporated here. That report detailed the results of a desktop reconnaissance survey for cultural resources which examined portions of the FFTOD Specific Plan Area. The *Florence-Firestone Community Atlas* identified 98 individual properties of interest and one potential historic district (Table 3.3-4). These properties are described as over 45 years old; exhibiting a moderate to high degree of historic integrity of design, materials, and workmanship; and/or possessing historic significance related to the development of the community.

The *Florence-Firestone Community Atlas* identified residential properties along Miramonte Boulevard from Gage Avenue to Florence Avenue as a potential historic district with 92 contributing elements (not listed individually in Table 3.3-4). This corridor possesses single-family and multiple-family residential properties, largely constructed between 1900 and 1930 (with very little modern infill development) and defined by mature palm trees lining either side of the street. Many of these properties would not be eligible individually; however, as a unit they appear to be the most intact representation of folk Victorian, craftsman, and minimal-traditional-style residences in the area. The Miramonte Boulevard concentration of residential properties appears eligible for historic district designation as an example of a streetcar suburb retaining its character-defining features such as consistent setbacks, narrow lots, street landscaping, and streets laid out on a grid (AECOM 2020). As these properties have been previously identified as potential historical properties further evaluation is needed to determine the eligibility of these resources.

**Table 3.3-4: FFTOD Specific Plan Area Potential Historical Properties Identified through the *Florence-Firestone Community Atlas* that Require Further Evaluation**

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 5829 Compton Ave | Commercial | 1946 |
| 1426 E 58th Pl | Residential | 1926 |
| 1422 E 58th Pl | Residential | 1912 |
| 1405 E 58th Dr | Residential | 1948 |
| 1411 E 58th Dr | Residential | 1907 |
| 1433 E 58th Dr | Residential | 1913 |
| 1445 E 59th St | Residential | 1904 |
| 1330 E 59th St | Residential | 1907 |
| 1326 E 59th St | Residential | 1922 |
| 1301 E 59th Pl | Residential | 1949 |
| 1419 E 61st St | Residential | 1910 |
| 6200 Hooper Ave | Residential | 1908 |
| 5869 Miramonte Blvd | Residential | 1923 |
| 5911 Miramonte Blvd | Residential | 1920 |
| 5908 Miramonte Blvd | Residential | 1963 |
| 5912 Miramonte Blvd | Residential | 1964 |
| 5903 Converse Ave | Residential | 1923 |
| 5907 Converse Ave | Residential | 1922 |
| 6000 Miramonte Blvd | Residential | 1915 |
| 6014 Miramonte Blvd | Residential | 1910 |
| 6019 Converse Ave | Residential | 1921 |
| 6025 Converse Ave | Residential | 1912 |
| 1700 E 58th Pl | Industrial | 1955 |
| 5930 Junction St | Residential | 1921 |
| 5933 Junction St | Residential | 1931 |
| 5931 Junction St | Residential | 1913 |
| 1822 E 61st St | Residential | 1907 |

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 6220 Holmes Ave | Residential | 1912 |
| 1740 E Gage Ave | Commercial | 1970 |
| 1853 E 65th St | Industrial | 1932 |
| 6500 Holmes Ave | Institutional | 1962 |
| 1854 E 67th St | Industrial | 1936 |
| 1863 E Florence Ave | Residential | 1921 |
| 1747 E Florence Ave | Commercial | 1933 |
| 6525 Compton Ave* | Industrial | 1938 |
| 6901 Compton Ave | Residential | 1914 |
| 6516 Makee Ave | Residential | 1915 |
| 6602 Miramonte Blvd | Residential | 1946 |
| 6601 Miramonte Blvd | Residential | 1940 |
| 6726 Compton Ave | Residential | 1922 |
| 6900 Compton Ave | Institutional | 1951 |
| 6904 Converse Ave | Residential | 1928 |
| 1655 E 71st St | Residential | 1912 |
| 1635 E Florence Ave | Commercial | 1912 |
| 1633 E Florence Ave | Commercial | 1928 |
| 1621 E Florence Ave | Commercial | 1923 |
| 7000 Compton Ave | Residential | 1913 |
| 7008 Compton Ave | Commercial | 1921 |
| 7807 Compton Ave | Government | - |
| 7660 Compton Ave | Institutional | 1950 |
| 1500 E Florence Ave | Commercial | 1928 |
| 1560 E Florence Ave | Commercial | 1941 |
| 7220 Maie Ave | Commercial | 1964 |
| 7322 Maie Ave | Industrial | 1933 |
| 1318 E Florence Ave | Commercial | 1933 |
| 2048 E Florence Ave | Commercial | 1932 |
| 7201 S Alameda St | Commercial | 1948 |
| 8526 Grape St | Government | - |
| 1839 Firestone Blvd | Institutional | 1964 |
| 7901 Compton Ave* | Government | 1967 |
| 1721 E 68th St | Residential | 1923 |
| 1739 E 68th St | Residential | 1928 |
| 1745 E 68th St | Residential | 1913 |
| 6805 Holmes Ave | Residential | 1924 |
| 1845 E 68th St | Residential | 1924 |
| 1842 E 69th St | Residential | 1913 |
| 1716 E 70th St | Residential | 1910 |
| 1863 E 71st St | Residential | 1929 |

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 7016 Holmes Ave | Residential | 1922 |
| 1432 E 74th St | Residential | 1952 |
| 1442 E 77th St | Residential | 1896 |
| 1542 E 77th Pl | Residential | 1925 |
| 7675 Whitsett Ave | Residential | 1922 |
| 7672 Whitsett Ave | Residential | 1922 |
| 7211 Bell Ave | Government | - |
| 7684 Walnut Dr | Residential | 1924 |
| 1930 E 73rd St | Residential | - |
| 2026 E 76th St | Residential | 1910 |
| 1540 E 80th St | Residential | 1960 |
| 8272 Miramonte Blvd | Residential | 1910 |
| 1610 E 80th St | Residential | 1925 |
| 8218 Morton Ave | Residential | 1920 |
| 1737 E 84th St | Residential | 1905 |
| 1785 E 85th St | Institutional | 1933 |
| 8511 Holmes Ave | Institutional | 1928 |
| 2008 E 87th St | Institutional | 1929 |
| 8701 Bandera St | Residential | 1910 |
| 8716 Elm St | Residential | 1913 |
| 1319 E 90th St | Residential | 1965 |
| 1423 E 90th St | Residential | 1955 |
| 8629 Bandera St* | Residential | 1921 |
| 1900 Firestone Blvd* | Commercial | - |
| 1428 E 82nd St* | Residential | 1947 |
| 1402 E 82nd St* | Residential | 1947 |
| 1830 E Florence Ave* | Commercial | 1981 |
| 7807 Compton Ave* | Government | c. 1974 |
| 7001 Compton Ave* | Commercial | 1946 |
| 7316 Compton Ave* | Commercial | 1961 |
| Miramonte Blvd Historic District (Multiple Addresses) | Residential | 1900-1930 |

Notes:
*Resource also identified in *A Paseo Through Time* in Florence-Firestone

Jeannene Przyblyski's book *A Paseo Through Time in Florence-Firestone* was also reviewed to identify cultural resources in the FFTOD Specific Plan Area. A total of 11 extant properties were identified within the FFTOD Specific Plan Area (Table 3.3-5). The other properties identified in *A Paseo Through Time in Florence-Firestone* are either outside of the FFTOD Specific Plan Area or are no longer extant. These properties have not been evaluated for national, state, or local register eligibility.

**Table 3.3-5: FFTOD Specific Plan Area Potential Historical Properties Identified through *A Paseo Through Time in Florence-Firestone* that Require Further Evaluation**

| Description | Address | Construction Date / Time Period |
|---|---|---|
| Former location of Graham Library | 8629 BANDERA ST | 1921 |
| Graham Library | 1900 FIRESTONE BLVD | - |
| William's Residence | 1428 E 82ND ST | 1947 |
| Carter Residence | 1402 E 82ND ST | 1947 |
| Former location of Fox Florence Theater | 1830 E FLORENCE AVE | 1981 |
| Florence-Firestone Community and Senior Center | 7807 COMPTON AVE | c. 1974 |
| Carlitos Tires/ "Steve's Place" | 7001 COMPTON AVE | 1946 |
| Superior Grocers | 7316 COMPTON AVE | 1961 |
| Gentry Theater | 6525 COMPTON AVE | 1938 |
| Firestone Sheriff Station/ Century Youth Activities League | 7901 COMPTON AVE | 1967 |
| Youth Activities League/ Former Los Angeles County Sheriff Station | 2201 E FIRESTONE BLVD | 1938 |

Source: Przyblyski 2017

## Public Outreach

A total of 12 cultural resources were identified through public outreach efforts (Table 3.3-6). These properties have not been evaluated for national, state, or local register eligibility.

**Table 3.3-6: FFTOD Specific Plan Area Cultural Resource Properties Identified through Public Outreach Efforts**

| Description | Address | Construction Date / Time Period |
|---|---|---|
| Gentry Theater | 6525 COMPTON AVE | 1938 |
| Storybook House | 2181 FIRESTONE BLVD | 1939 |
| Graham Library | 1900 FIRESTONE BLVD | - |
| Graham Library (former location) | 1925 E. 87TH ST | 1938 |
| Graham Library (former location) | 8511 HOLMES AVE | |
| Firestone Sheriff Station/ Century Youth Activities League | 7901 COMPTON AVE | 1967 |
| Youth Activities League/ Former Los Angeles County Sheriff Station | 2201 E FIRESTONE BLVD | 1938 |
| Former location of Firestone Park Station; former locations of the Florence Library and Florence-Firestone Chamber of Commerce | 1557 E FLORENCE AVE | 1921 |
| Former location of Firestone Park Station; former locations of the Florence Library and Florence-Firestone Chamber of Commerce | 1555 E FLORENCE AVE | 1921 |
| Tessie Cleveland Community Services Corporation | 8019 COMPTON AVE | - |
| Youth Activities League | 7116 MAKEE AVE | c. 1977 |
| Miramonte Blvd. Palm trees | Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south) | c. 1900-1930 |

## 3.3.2 Regulatory Setting

Federal, state, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Historic Preservation Act (NHPA) and CEQA are the primary federal and state laws governing preservation of historic and archaeological resources of national, regional, state and local significance.

### 3.3.2.1 Federal

#### National Historic Preservation Act

The NHPA (16 United States Code 470) and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) establish a program for the preservation of historic properties throughout the U.S. and provides a framework for identifying and treating historical and archaeological resources under CEQA. Section 106 of the NHPA requires that federal projects or projects under federal jurisdiction consider the effect of an undertaking on properties eligible for or included in the NRHP. Historic properties that are listed in or eligible for the NRHP are considered historical resources for the purposes of CEQA.

NHPA establishes the NRHP, which is "an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR Part 60.2). To be eligible for listing in the NRHP, a property must be at least 50 years old (or have reached 50 years old by the project completion date) and possess significance in American history and culture, architecture, or archaeology to meet one or more of four established criteria (36 CFR Part 60.4):

A. Association with events that have made a significant contribution to the broad patterns of our history;
B. Association with the lives of persons significant in our past;
C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and/or
D. Have yielded, or may be likely to yield, information important in prehistory or history.

Historic resources eligible for listing in the NRHP are considered "historic properties" and may include buildings, sites, structures, objects, and historic districts. A potential historic property less than 50 years old may be eligible under NRHP Criteria Consideration G if it can be demonstrated that sufficient time has passed to understand its historic importance (National Register Bulletin 15, page 43). To be eligible for listing in the NRHP, a property must also have integrity, which is defined as "the ability of a property to convey its significance." Under the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity: feeling, association, workmanship, location, design, setting, and materials (National Register Bulletin 15, pages 44–45).

The implementing regulations include a provision for early and effective communication with interested parties, such as Native American tribes. Under this provision (36 CFR Part 800.2[A]),

the lead agency is responsible for contacting local Native American representatives and informing them of the project's intent and nature. The Native American representative is then provided "a reasonable opportunity to identify its concerns about historic properties; advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance; articulate its views on the undertaking's effects on such properties; and participate in the resolution of adverse effects."

### State

California implements the NHPA through comprehensive cultural resources surveys and preservation programs. The California Office of Historic Preservation (OHP) implements the policies of the NHPA and maintains the California Historical Resources Inventory.

#### *California Environmental Quality Act*

Under CEQA (Public Resources Code [PRC] Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. *State CEQA Guidelines* Section 15064.5 defines a historical resource as: 1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR; 2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and 3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or Section 5024.1.

As described by PRC Section 21084.1 and Section 15064.5 of the *State CEQA Guidelines*, should a project cause a substantial adverse change (defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired) in the significance of an historical resource, the lead agency must identify potentially feasible measures to mitigate these effects (*State CEQA Guidelines* Sections 15064.5[b][1] and 15064.5 [b][4]).

Archaeological resources are defined in CEQA Section 21083.2, which states that a "unique" archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Unique archaeological resources as defined in Section 21083.2 may require reasonable efforts to preserve resources in place (Section 21083.1[a]). If preservation in place is not feasible, mitigation measures will be required. In addition, the *State CEQA Guidelines* specify that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources will not be considered a significant effect on the environment (*State CEQA Guidelines* Section 15064.5[c][4]

### *California Register of Historical Resources*

The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing historical resources within the state and to indicate which of those resources should be protected—to the extent prudent and feasible—from substantial adverse change. The CRHR consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. Properties eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data (California Code of Regulations Section 4852 [c]) To be eligible for listing in the CRHR, a property must be at least 45 years of age and possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Potential historical resources eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. A resource less than 45 years old may be eligible if it can be demonstrated that sufficient time has passed to understand its historic importance. While the enabling legislation for the CRHR is less rigorous with regard to the issue of integrity, there is an expectation that properties reflect their appearance during their period of significance (PRC Section 4852).

### *California Points of Historical Interest*

California Points of Historical Interest (PHIs) are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. PHIs designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historic resource may be designated as both a landmark and a point. If a point is later granted status as a landmark, the point designation will be retired. In practice, the point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance. To be eligible for designation as a PHI, a resource must meet at least one of the following criteria:

- It is the first, last, only, or most significant of its type within the local geographic region (city or county);
- It is associated with an individual or group having a profound influence on the history of the local area; or

It is a prototype of—or an outstanding example of—a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

#### *California Public Resources Code*

Archaeological and historical sites are protected pursuant to policies and regulations enumerated under the California PRC. California PRC Sections 5020–5029.5 continue the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. California PRC Sections 5079–5079.65 define the functions and duties of the OHP. The OHP is responsible for the administration of federally and State-mandated historic preservation programs in California and the California Heritage Fund. California PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods. California PRC Section 21083.2(g) protects archaeological resources. California PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

### Local

#### *County of Los Angeles*

The Historic Preservation Ordinance establishes a local register and a Historical Landmarks and Records Commission to oversee the enforcement of preservation policies that relate to planning, demolition, alteration, and new construction. Actions to resources that are locally registered or eligible for registration are reviewed by the Historical Landmarks and Records Commission for appropriateness.

## 3.3.3 Methodology

According to the State CEQA Guidelines (Section 15064.5[b]), a project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment. The Guidelines further state that a substantial adverse change in the significance of a resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired. Actions that would materially impair the significance of a historical resource are any actions that would demolish or adversely alter those physical characteristics of a historical resource that convey its historical significance and qualify it for inclusion in the

California Register or in a local register or survey that meet the requirements of PRC Section 5020.1(k) and Section 5024.1(g). A lead agency must also take into account impacts to unique archaeological resources (State CEQA Guidelines Section 15064.5[c][1]-[4]). A project that may disrupt or adversely affect paleontological resources is a project that may have a significant effect on the environment.

#### 3.3.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have a significant impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of dedicated cemeteries.

### 3.3.4 Environmental Impacts

**CUL-1:** *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?*

As previously described, FFTOD Specific Plan Area has a variety of historical resources and cultural resources that require further evaluation. Five previously recorded historical resources have been identified within the FFTOD Specific Plan Area. These resources include the NRHP eligible Miramonte Elementary School (P-19-176186); the Union Pacific Railroad (P-19-186110); the Mojave Road, which is a California Registered Historical Landmark # 963; the Boulder Dam – Los Angeles 287.5kV Transmission Line (P-19-188983); and the Paul R. Williams/ Parkside Manor Historic District (P-19-190949).

The FFTOD Specific Plan would establish transit oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three Metro A (Blue) Line Stations in the community (i.e., Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit-oriented development pattern, which could impact existing historical resources within the FFTOD Specific Plan Area and its surroundings.

The FFTOD Specific Plan does not identify or propose any specific development projects; therefore, it would not directly demolish or materially alter historical resources. However, identified historic structures and sites that are eligible or potentially eligible for NRHP listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore,

there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

In addition to the historic resources identified in this section, there are numerous other residential and commercial buildings within the FFTOD Specific Plan Area that are older than 50 years. As these structures have not been comprehensively surveyed and evaluated, it is possible that they may be eligible as historic resources if other criteria apply, such as significant associations with important events, people, or have high architectural merit. Therefore, future development projects pursuant to implementation of the FFTOD Specific Plan could adversely affect other historical resources not identified in this section. The impact to a historical resource is considered significant. Overall, the FFTOD Specific Plan would not immediately impact any potentially historical resources provided in Table 3.3-4, Table 3.3-5, and Table 3.3-6. However, future development projects pursuant to implementation of the FFTOD Specific Plan that involve these properties would require a formal assessment of the resources.

**CUL-2:** *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?*

Future development projects pursuant to implementation of the FFTOD Specific Plan could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The FFTOD Specific Plan Area is considered potentially sensitive for archaeological resources. Therefore, ground disturbance is considered to have a high potential for uncovering archaeological resources.

**CUL-3:** *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Ground disturbance from future development projects pursuant to implementation of the FFTOD Specific Plan could damage fossils buried in soils. Abundant fossils occur in the older Quaternary alluvial deposits in the FFTOD Specific Plan Area. These deposits have produced numerous important fossil specimens. Therefore, the FFTOD Specific Plan Area contains significant, nonrenewable, paleontological resources that are considered to have high sensitivity.

**CUL-4:** *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

There are thousands of archaeological sites within Los Angeles County and human habitation in Los Angeles County is known to date to at least approximately 7,000 years B.C. Therefore, human remains could be buried in soils. The FFTOD Specific Plan Area is developed and has previously been subjected to substantial ground disturbance, which likely already resulted in the discovery of subsurface materials such as human remains. Nevertheless, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. Human burials have specific provisions for treatment in Section 5097 of the California PRC, which authorizes the Native American Heritage Commission

to resolve any disputes related to the disposition of Native American burials. PRC Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have provisions protecting human burial remains from disturbance, vandalism, or destruction. California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to their authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the Native American Heritage Commission by phone within 24 hours. Therefore, compliance with these regulations would ensure impacts to discovery of human remains are less than significant.

## 3.3.5 Programmatic Mitigation Measures

The potential to impact historical resources would be mitigated to the greatest extent practicable by implementing the following programmatic mitigation measure:

**MM CUL-1** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involves ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the

maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

The potential to impact archaeological resources would be mitigated to the greatest extent feasible by implementing the following programmatic mitigation measure:

**MM CUL-2** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the County of Los Angeles' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with Los Angeles County, and local Native American representatives expressing interest.

During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

The potential to impact paleontological resources would be mitigated to the greatest extent practicable by implementing the following programmatic mitigation measure:

**MM CUL-3** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately

notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

## 3.3.6 Level of Significance after Mitigation

Programmatic Mitigation Measure CUL-1 has been incorporated into the project to protect historic resources. However, the provisions of CUL-1 afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. In addition, some structures that are not currently considered for historic value (because generally, they must be at least 50 years old) could become worthy of consideration during the planning period for the project (i.e., during the horizon year of 2035). While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact.

Programmatic Mitigation Measures CUL-2 and CUL-3 would reduce potential impacts associated with archaeological and paleontological resources to a less-than-significant level.

## 3.3.7 Cumulative Impacts

Even with Programmatic Mitigation Measure CUL-1, the project could still contribute to significant cumulative impacts to historic resources. Therefore, the project's contribution would still be significant.

The implementation of Programmatic Mitigation Measures CUL-2 and CUL-3 would ensure that the project's contribution to cumulative impacts on archaeological resources and paleontological resources would be reduced to less than cumulatively considerable by avoiding an adverse impact or an adverse change in the significance.

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# 3.4 ENERGY

This section evaluates the impacts on energy demand from construction and operation of new development that occurs under the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan). Presented below is an overview of federal, state, and local laws and regulations pertaining to energy, overview of California's energy production, supply, and consumption, and the methodology used to evaluate energy resources related to the project. The analysis evaluates potential impacts related to those energy resources that would be affected as a result of implementation of the project.

## 3.4.1 Environmental Setting

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

- decreasing overall per capita energy consumption
- decreasing reliance on fossil fuels such as coal, natural gas, and oil
- increasing reliance on renewable energy sources

In order to assure that energy implications are considered in project decisions, the California Environmental Quality Act (CEQA) requires that Environmental Impact Reports (EIRs) 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]). Energy conservation implies that a project's cost effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, cost effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving the project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

### 3.4.1.1 Energy Background

In 2019, California generated a total of 277,704 gigawatt-hours[1] of electricity, of which approximately 200,475 gigawatt-hours were generated in-state (CEC 2020a). The total nonresidential and residential electricity consumption for Los Angeles County in 2019 was estimated to be approximately 66,119 gigawatt-hours (CEC 2020b).

Total natural gas consumption in 2018 in California was estimated to be 2,207 trillion British thermal units (Btu) (EIA 2020a)[2]. The total nonresidential and residential natural gas consumption for Los Angeles County in 2018 was estimated to be approximately 3,048 million therms[3] (CEC 2020c).

[1] Gigawatt hour (GWh) is a unit of energy equal to 1000 Megawatt hours, or 1 million kilowatt-hours (1 kilowatt-hour is equal to 3,412 British thermal units (EIA 2021a).
[2] A British thermal unit (Btu) is a measure of the heat content of fuels or energy sources. It is the quantity of heat required to raise the temperature of one pound of liquid water by 1 degree Fahrenheit at the temperature that water has its greatest density (approximately 39 degrees Fahrenheit) (EIA 2021a).
[3] One therm equals 100,000 Btu, or 0.10 million Btu (EIA 2021b).

Electric and natural gas services in the FFTOD Specific Plan Area are provided by Southern California Edison (SCE) and Southern California Gas Company (SCG), respectively. SCE serves approximately 15 million people in a 50,000 square-mile area in central, coastal, and southern California, including Los Angeles County (Edison International 2019). In 2018, SCE's primary power sources are eligible renewables (36 percent), large hydroelectric (4 percent), natural gas (17 percent), nuclear (6 percent), and unspecified sources of power (37 percent) (CEC 2019a). SCG is the nation's largest natural gas distribution utility, delivering energy to 21.8 million consumers across 24,000 square miles. Most of the natural gas used in California (more than 90 percent) is produced out of state from basins in Texas and New Mexico and stored at various storage facilities in Southern California (SCG 2021).

#### 3.4.1.2 Energy Use for Transportation

Transportation is the largest energy-consuming sector in California, accounting for approximately 39 percent of all energy use in the state (EIA 2020b). More motor vehicles are registered in California than in any other state, and commute times in California are among the longest in the country (EIA 2020c). Types of transportation fuel have diversified in California and elsewhere. Historically gasoline and diesel fuel accounted for nearly all demand; now, however, numerous options are available, including ethanol, natural gas, electricity, and hydrogen. Gasoline and diesel fuel constitute 83 and 17 percent of petroleum-based fuels sold in California, respectively. In 2018, sales of diesel fuel to California end users was approximately 1,187,100 gallons per day (gpd) and sales of gasoline to California end users was approximately 455,900 gpd (CEC 2019c). While gasoline and diesel fuel remain the primary fuels fused for transportation in California, the types of transportation fuel have diversified in California and elsewhere. Various statewide regulations and plans (e.g., Low Carbon Fuel Standard, Assembly Bill [AB] 32 Scoping Plan) encourage the use of a variety of alternatives are used to reduce demand for petroleum based fuel. Depending on the vehicle capability, conventional gasoline and diesel are increasingly being replaced by alternative transportation fuels including biodiesel, electricity, ethanol, hydrogen, natural gas, and other synthetic fuels. California has a growing number of alternative fuel vehicles through the joint efforts of the California Energy Commission (CEC), California Air Resources Board, local air districts, federal government, transit agencies, utilities, and other public and private entities.

## 3.4.2 Regulatory Setting

The federal, state, and local regulatory background of energy plans, policies, regulations, and laws is presented below. Generally, these plans, policies, regulations, and laws do not directly apply to the project but are presented to provide context to the regulatory framework.

#### 3.4.2.1 Federal

### Energy Policy and Conservation Act of 1075

The Energy Policy and Conservation Act of 1975 established the first fuel economy standards for on-road motor vehicles sold in the United States. The National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing standards for vehicles and revising the existing standards. The Energy Policy and Conservation Act of 1975 also established the Corporate Average Fuel Economy program, which was created to determine vehicle manufacturers'

compliance with the fuel economy standards. The U.S. Environmental Protection Agency (EPA) administers the testing program that generates the fuel economy data.

### National Energy Act of 1978

The National Energy Act of 1978 includes the Public Utility Regulatory Policies Act (Public Law 95-617), Energy Tax Act (Public Law 95-318), National Energy Conservation Policy Act (Public Law 95-619), Power Plant and Industrial Fuel Use Act (Public Law 95-620), and Natural Gas Policy Act (Public Law 95-621).

The intent of the National Energy Act was to promote greater use of renewable energy, provide residential consumers with energy conservation audits to encourage slower growth of electricity demand, and promote fuel efficiency. The Public Utility Regulatory Policies Act created a market for nonutility electric power producers to permit independent power producers to connect to their lines and to pay for the electricity that was delivered.

The Energy Tax Act promoted fuel efficiency and renewable energy through taxes and tax credits. The National Energy Conservation Policy Act required utilities to provide residential consumers with energy conservation audits and other services to encourage slower growth of electricity demand.

### Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 was enacted to reduce dependence on imported petroleum and improve air quality by addressing all aspects of energy supply and demand, including alternative fuels, renewable energy, and energy efficiency. This law requires certain federal, state, and local government and private fleets to purchase alternative fuel vehicles. The act also defines "alternative fuels" to include fuels such as ethanol, natural gas, propane, hydrogen, electricity, and biodiesel.

The Energy Policy Act of 2005 was enacted on August 8, 2005. This law set federal energy management requirements for energy-efficient product procurement, energy savings performance contracts, building performance standards, renewable energy requirements, and use of alternative fuels. The Energy Policy Act of 2005 also amends existing regulations, including fuel economy testing procedures.

### Energy Independence and Security Act of 2007

Signed into law in December 2007, the Energy Independence and Security Act was enacted to increase the production of clean renewable fuels; increase the efficiency of products, buildings, and vehicles; improve the federal government's energy performance; and increase U.S. energy security, develop renewable fuel production, and improve vehicle fuel economy. The Energy Independence and Security Act included the first increase in fuel economy standards for passenger cars since 1975. The act also included a new energy grant program for use by local governments in implementing energy-efficiency initiatives, as well as a variety of green building incentives and programs.

### Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

On May 7, 2010, the final Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards were published in the Federal Register. Phase 1 of the emissions standards required that model year 2012–2016 vehicles meet an estimated combined average emissions level of 250 grams of carbon dioxide ($CO_2$) per mile, which is equivalent to 35.5 miles per gallon if the automobile industry were to meet this CO2 level solely through fuel economy improvements.

On August 28, 2012, the U.S. Department of Transportation and EPA issued a joint final rulemaking requiring additional federal greenhouse gas (GHG) and fuel economy standards for Phase 2 of the emissions standards for model year 2017–2025 passenger cars and light-duty trucks. The standards would require these vehicles to meet an estimated combined average emissions level of 163 grams of CO2 per mile in model year 2025, which is equivalent to 54.5 miles per gallon if the improvements were made solely through fuel efficiency. However, on April 2, 2018, EPA issued a midterm evaluation final determination that found that the model year 2022–2025 emissions standards are not appropriate and should be revised. This midterm evaluation is not a final agency action; rather, this determination led to the initiation of rulemaking of the Safer Affordable Fuel-Efficient Vehicle Rule.

### Executive Order 13834

Executive Order (EO) 13834, signed on May 17, 2018, directs federal agencies to manage their buildings, vehicles, and overall operations to optimize energy and environmental performance, reduce waste, and cut costs. EO 13834 includes requirements for federal agencies including but not limited to reducing building energy use annually and implementing cost-saving energy efficiency measures, ensure new construction and major renovations conform to building efficiency requirements and sustainable design principles, and meet statutory requirements for renewable energy and electricity consumption.

### Safer Affordable Fuel-Efficient Vehicle Rule

On March 31, 2020, the NHTSA and EPA finalized the Safer Affordable Fuel Efficient (SAFE) Vehicle Rule for Model Years 2021-2026 (SAFE Rule). The SAFE Rule revokes California's authority and vehicle waiver to set its own emissions standards and set zero emission vehicle mandates in California for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026. The final rule will increase stringency of $CO_2$ emissions standards by 1.5 percent each year through model year 2026, as compared with the $CO_2$ standards issued in 2012, which would have required increases of about 5 percent per year (NHTSA 2020). On January 20, 2021, President Biden signed an EO directing consideration of labor unions, states, and industry views to propose suspension, revision, or rescindment of the SAFE Vehicles Rule (The White House 2021).

### Renewable Fuel Standard Program

Created by the Energy Policy Act of 2005, which amended the Clean Air Act, the Renewable Fuel Standard Program established requirements to replace certain volumes of petroleum-based fuels with renewable fuels. The four renewable fuel types accepted as part of the Renewable Fuel

Standard Program are biomass-based diesel, cellulosic biofuel, advanced biofuel, and total renewable fuel. The 2007 Energy Independence and Security Act expanded the program and its requirements to include long-term goals of using 36 billion gallons of renewable fuels and extending annual renewable-fuel volume requirements to year 2022. "Obligated parties" such as refiners and importers of gasoline or diesel fuel must meet specific blending requirements for the four renewable fuel types. EPA implements the program in consultation with U.S. Departments of Agriculture and Energy. The obligated parties are required to demonstrate their compliance with the Renewable Fuel Standard Program.

#### 3.4.2.2 State

### California Energy Commission Plans and Programs

The CEC is the state's primary energy policy, planning, and energy efficiency standards regulatory agency. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. The CEC has five major responsibilities: 1) forecasting future energy needs and keeping historical energy data; 2) licensing thermal power plants 50 megawatts or larger; 3) promoting energy efficiency through appliance and building standards; 4) developing energy technologies and supporting renewable energy; and 5) planning for and directing the state response to an energy emergency. Last updated in 2008, the State of California Energy Action Plan establishes goals and specific actions to ensure adequate, reliable, and reasonably priced electrical power and natural gas supplies, initiatives for increasing supply and reducing demand, in the context of global climate change (CEC 2008). The CEC conducts assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery, and distribution, The CEC adopts the Integrated Energy Policy Report every 2 years and an update every other year. The 2019 Integrated Energy Policy Report, adopted February 2020, is the most recent report and provides a summary of energy issues, outlining strategies and recommendations to further California's goal of ensuring reliable, affordable, and environmentally responsible energy sources (CEC 2020d).

### California Public Utilities Commission

The California Public Utilities Commission (CPUC) has authority to set electric rates, regulate natural gas utility service, protect consumers, promote energy efficiency, and ensure electric system reliability. The CPUC has established rules for the planning and construction of new transmission facilities, distribution facilities, and substations. Utility companies are required to obtain permits to construct certain power line facilities or substations. The CPUC also has jurisdiction over the siting of natural gas transmission lines.

The CPUC regulates distributed generation policies and programs for both customers and utilities. This includes incentive programs (e.g., California Solar Initiative) and net energy metering policies. Net energy metering allows customers to receive a financial credit for power generated by their on-site system and fed back to the utility. The CPUC is involved with utilities through a variety of energy procurement programs, including the Renewable Portfolio Standard program.

The CPUC Long Term Energy Efficiency Strategic Plan, which is the roadmap to achieving maximum energy savings in California through 2020, was originally adopted in 2008 and

subsequently updated in 2011 to include a lighting chapter (CPUC 2011). Action plans provide a framework for implementing each chapter of the Strategic Plan. Consistent with California's energy policy and electricity "loading order", the Energy Efficiency Strategic Plan indicates that energy efficiency is the highest priority resource in meeting California's energy needs. The CPUC also adopted energy goals for all new residential construction in California to be zero net energy (ZNE) by 2020. The ZNE goal means new buildings must use a combination of improved efficiency and distributed renewable energy generation to meet 100 percent of their annual energy need (CEC 2015b). In addition to the ZNE goals for residential buildings by 2020, the CPUC has adopted goals that all new commercial construction in California will be ZNE by 2030 and 50 percent of existing commercial buildings will be retrofit to ZNE by 2030.

### Renewables Portfolio Standard

State legislation has established increasingly stringent renewables portfolio standard (RPS) requirements for California's utility companies. RPS-eligible energy sources include wind, solar, geothermal, biomass, and small scale hydro projects.

Senate Bill (SB) 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010.

EO S-14-08 expanded the state's RPS to 33 percent renewable power by 2020. EO S-21-09 directs the Air Resources Board (ARB) under its AB 32 authority to enact regulations to help the state meet its RPS goal of 33 percent renewable energy by 2020. The 33 percent-by-2020 goal and requirements were codified in April 2011 with SB X1-2. This new RPS applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. SB 350 (2015) increased the renewable-source requirement to 50 percent by 2030, which was further increased under SB 100 in 2018 to 60 percent by 2030 and requiring all the State's electricity to come from carbon-free resources by 2045.

A major component of California's Renewable Energy Program is the RPS established under Senate Bills 1078 (Sher) and 107 (Simitian). SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. EO S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. The 33 percent-by-2020 goal and requirements were codified in April 2011 with SB X1-2. This new RPS applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas.

These requirements reduce the carbon content of electricity generation associated with both existing and new development, including that in the FFTOD Specific Plan Area.

## California Code or Regulations, Title 20 and 24

New buildings constructed in California must comply with the standards contained in California Code of Regulations (CCR) Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards.

Title 20 standards range from power plant procedures and siting to energy efficiency standards for appliances, ensuring reliable energy sources are provided and diversified through energy efficiency and renewable energy resources. California's 2009 Appliance Efficiency Regulations (20 CCR 1601–1608) were adopted by the CEC on December 3, 2008 and approved by the California Office of Administrative Law on July 10, 2009. The regulations include standards for both federally regulated appliances and nonfederally regulated appliances.

Title 24 requires the design of building shells and building components to conserve energy. The Energy Conservation Standards for new residential and nonresidential buildings were established by the CEC in June 1977 June 1977 and were most recently revised in 2019 (Title 24, Part 6 of the California Code of Regulations [Title 24]). Title 24 governs energy consumed by commercial and residential buildings in California. This includes the heating, ventilation, and air conditioning (HVAC) system; water heating; and some fixed lighting. Nonbuilding energy use, or "plug-in" energy use, is not covered by Title 24. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. California's Building Energy Efficiency Standards are updated on an approximate 3-year cycle. One of the improvements included within the 2019 Building Energy Efficiency Standards is the requirements that certain residential developments, including some single-family and low-rise residential development, include on-site solar energy systems capable of producing 100 percent of the electricity demand of the residences. With implementation of solar photovoltaic systems with new residential development, homes built under the 2019 standards will use approximately 53 percent less energy than those under the 2016 standards. Nonresidential buildings are anticipated to consume 30 percent less energy as compared to nonresidential buildings constructed under the 2016 California Energy Code, primarily through prescriptive requirements for high-efficiency lighting (CEC 2018). The Energy Code is enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary related to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

California Green Building Standards Code (CALGreen) (24 CCR Part 11) is intended to enhance the design and construction of buildings through the use of building concepts that benefit the environment and public health and encourage sustainability in construction and operations of a building. The provisions of the code apply to the planning, design, construction, use and occupancy of all newly constructed buildings and structures throughout California. Some key provisions of the code include, but are not limited to, requirements related to the installation of electric vehicle charging infrastructure in residential and nonresidential developments, establishment of maximum fixture water use rates to reduce indoor water use consumption, diversion of 65 percent of construction and demolition waste from landfills, and mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, and flooring.

### Executive Order B-18-12

EO B-18-12 orders all new State buildings and major renovations beginning design after 2025 be constructed as Zero Net Energy facilities. The EO sets an interim target for 50 percent of new facilities beginning design after 2020 to be Zero Net Energy. It directs State agencies to take measures toward achieving Zero Net Energy for 50 percent of the square footage of existing State-owned building area by 2025.

## 3.4.2.3 Local

### Los Angeles County General Plan

The Los Angeles County General Plan was adopted on October 6, 2015. The Los Angeles County General Plan provides the policy framework and establishes the long range vision for how and where the unincorporated areas will grow, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. The following policies included within the General Plan are applicable to energy resources:

- Policy LU 11.1: Encourage new development to employ sustainable energy practices, such as using passive solar techniques and/or active solar technologies.
- Policy LU 11.2: Support the design of developments that provide substantial tree canopy cover, and use light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.

### Los Angeles County Community Climate Action Plan

Los Angeles County adopted the Community Climate Action Plan (CCAP) as part of the Los Angeles County General Plan 2035 on October 6, 2015. The plan addresses GHG emissions within the unincorporated communities of Los Angeles County and sets Los Angeles County's local GHG reduction goals for 2020 pursuant to AB 32. As part of the CCAP, Los Angeles County identified new actions to expand green building initiatives and popular efficiency programs such as: green building development, energy efficiency programs, solar installations, alternative renewable energy programs, wastewater treatment plant biogas, energy efficiency retrofits of wastewater equipment, and landfill biogas. The 2020 CCAP is currently in the process of being updated (see the discussion below).

### Los Angeles County Climate Action Plan (in progress)

Los Angeles County's existing CCAP document was adopted by the Board of Supervisors in 2015 as a component of the Los Angeles County General Plan 2035; it expired in 2020 and will be replaced by the Los Angeles County Climate Action Plan (Los Angeles County Climate Action Plan [CAP]). The Los Angeles County CAP will tie together existing climate change initiatives and provide a blueprint for deep carbon reductions. Through this updated CAP, Los Angeles County is targeting carbon neutrality by 2045 in unincorporated Los Angeles County.

The Los Angeles County CAP will outline actions that Los Angeles County plans to take to reduce GHG emissions and adapt to a changing climate in unincorporated areas. The Los Angeles County CAP will include a GHG inventory and a roadmap for addressing emissions from stationary energy (used by buildings and other facilities), transportation, waste, industrial, agricultural, and land use

sectors. Mitigation measures identified in the plan will also yield community co-benefits, including improvements in air quality, public health, mobility, and resilience. The Los Angeles County CAP will be aligned with the General Plan as well as OurCounty, the countywide sustainability plan adopted by the Board of Supervisors in 2019, to support decision-makers in delivering climate compatible solutions in unincorporated Los Angeles County. The Los Angeles County CAP includes the following energy mitigation strategies: decarbonize building energy use; promote water conservation; increase energy resilience; and increase renewable energy.

### OurCounty Sustainability Plan

OurCounty is a regional sustainability plan for Los Angeles. The plan outlines what local governments and stakeholders can do to enhance the well-being of every community in Los Angeles County while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution. This plan envisions streets and parks that are accessible, safe, and welcoming to everyone; air, water, and soil that are clean and healthy; affordable housing that enables all residents to thrive in place; and a just economy that runs on renewable energy instead of fossil fuels. OurCounty includes the following goals applicable to energy resources:

- Goal 7: A fossil fuel-free Los Angeles County
- Goal 9: Sustainable production and consumption of resources

### Florence-Firestone Community Plan

The Florence-Firestone Community Plan was adopted in September 2019. This Community Plan is a land use development guide intended to direct development and land use decisions to achieve the community's vision. The Community Plan includes the following goals and policies applicable to energy resources:

- Policy EJ-2.2: Energy Efficient Development. Incentivize development that uses energy efficient products, renewable energy systems, and produces clean energy.
- Policy EJ-2.4 Green Building Techniques. Encourage existing public and private development to incorporate green building techniques, such as construction waste management practices, optimization of energy efficiency measures, and avoidance of toxic chemicals.
- Policy PF-1.1 Sustainability Benchmarks. Ensure all new Los Angeles County buildings meet the goals of environmental sustainability, carbon footprint reduction, water conservation, and energy conservation by conducting an environmental audit of all Los Angeles County facilities in Florence-Firestone.
- Policy PF-1.2 Facility Maintenance. Ensure that routine maintenance and operations work optimizes water and energy conservation, and prolong the life of existing Los Angeles County buildings and facilities through preventative maintenance programs and procedures.
- Policy PF-1.3 Renewable Energy and Conservation. Use strategies to conserve water and energy in Florence-Firestone public facilities and transition to alternative renewable energy sources, such as wind and solar, where feasible.
- Policy PS/F 6.8: Encourage projects that incorporate onsite renewable energy systems.

## 3.4.3 Methodology

Energy impacts were analyzed by assessing energy usage associated with construction and operation of development within the FFTOD Specific Plan Area. Future energy demand was calculated consistent with the criteria air pollutant and GHG emissions modeling, conducted using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 (see Section 3.2, Air Quality, and Section 3.6, Greenhouse Gas Emissions, for additional description of modeling details). Detailed project inputs, assumptions, and calculations are provided in Appendix D.

### 3.4.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on energy if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

For a discussion of impacts related to the relocation or construction of new or expanded electrical power and natural gas facilities, see Section 3.16, "Utilities."

## 3.4.4 Environmental Impacts

**ENE-1:** *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Energy efficiency is a possible indicator of environmental impacts. The actual adverse physical environmental effects associated with energy use and the efficiency of energy use detailed throughout this EIR in the environmental topic-specific sections. For example, use of energy for transportation leads to air pollutant emissions, the impacts of which are addressed in Section 3.2 and Section 3.6 of this EIR. There is no significant impact associated with energy efficiency that is not addressed in the environmental topic-specific sections of this EIR.

### 3.4.4.1 Construction-Related Energy Consumption

Construction associated with future buildout of the FFTOD Specific Plan would result in consumption of energy in the form of electricity, natural gas, and fossil fuels (e.g., gasoline and diesel fuel) for the duration of the construction. The primary energy demands during construction would be associated with refueling construction vehicles and equipment and would be short-term in nature. Energy in the form of fuel and electricity would be consumed during this period by construction vehicles and equipment operating on-site, trucks delivering equipment and supplies to the site, and construction workers driving to and from the site. The fuel consumption anticipated to occur as a result of FFTOD Specific Plan construction activities is provided in Table 3.4-1 and Table 3.4-2. The maximum annual fuel consumption for the most intense construction-year scenario is provided in Table 3.4-1 (assuming 25 percent of the assumed land uses in the FFTOD Specific Plan Area are constructed within a single year). The total and average annual fuel consumption that would occur over the anticipated 15-year construction period for full development of the FFTOD Specific Plan Area is provided in Table 3.4-2.

The information in these tables is based on the CalEEMod emissions calculations for proposed construction activities and application of the U.S. Energy Information Administration's $CO_2$ emissions coefficients (EIA 2016) to estimate fuel consumption for construction activities. Detailed model inputs, assumptions, and calculations are provided in Appendix D.

**Table 3.4-1: Construction Fuel Consumption, Maximum Annual Construction Year**

| Source | MT $CO_2$[a] | Fuel Type | Factor (MT $CO_2$ / Gallon)[b] | Gallons |
|---|---|---|---|---|
| Off-Road Equipment | 2,197 | Diesel | 0.01016 | 216,205 |
| Haul and Vendor Trucks | 964 | Diesel | 0.01016 | 94,876 |
| Worker Vehicles | 3,330 | Gasoline | 0.00889 | 374,662 |
| **Total Gallons** | | | **Diesel** | **311,081** |
| | | | **Gasoline** | **374,662** |

Notes:
CO2 = carbon dioxide; CO2e = carbon dioxide equivalent; MT = metric tons
Assumed amortization period is 30 years, based on the typically assumed project lifetime based on South Coast Air Quality Management District guidance of amortizing GHG emissions from construction activities over a project's operational lifetime (typically assumed to be 30 years).
Sources: [a] Modeled by AECOM in 2021; [b] EIA 2016

**Table 3.4-2: Construction Fuel Consumption, Total and Average Annual**

| Source | MT $CO_2$[a] | Fuel Type | Factor (MT $CO_2$ / Gallon)[b] | Gallons |
|---|---|---|---|---|
| Off-Road Equipment | 8,787 | Diesel | 0.01016 | 864,820 |
| Haul and Vendor Trucks | 3,856 | Diesel | 0.01016 | 379,504 |
| Worker Vehicles | 13,318 | Gasoline | 0.00889 | 1,498,646 |
| **Total Gallons** | | | **Diesel** | **1,244,323** |
| | | | **Gasoline** | **1,498,646** |
| **Average Annual (over the 15-year construction period)** | | | **Diesel** | **82,955** |
| | | | **Gasoline** | **99,910** |

Notes:
CO2 = carbon dioxide; CO2e = carbon dioxide equivalent; MT = metric tons
Total construction demand determined based upon 4 times the maximum annual construction year (assumed to be 25% of total buildout.
Average annual fuel consumption estimated based on a construction buildout period of 15 years.
Sources: [a] Modeled by AECOM in 2021; [b] EIA 2016

Energy consumption would vary depending on the type of construction activities. For example, although it is unlikely, to conservatively estimate maximum potential fuel demands, it is assumed that a year of maximum potential development could include construction of up to 25 percent of assumed land uses in the FFTOD Specific Plan Area in a single year. Under this scenario, and as provided in Table 3.4-1, approximately 311,081 gallons of diesel and 374,662 gallons of gasoline would be consumed in a single year. Because of these conservative assumptions, actual maximum annual construction-related fuel consumption could be less than those estimated, and more likely reflective of the average annual fuel consumption provided in Table 3.4-2. Considering a steadier rate of development over an anticipated 15-year development period, average annual fuel consumption would be approximately 82,955 gallons of diesel and 99,910 gallons of gasoline per year, for a total of 1,244,323 gallons of diesel and 1,498,646 gallons of gasoline over the 15-year

construction period. In addition, estimates for both maximum annual and average annual fuel consumption assume construction in the earliest possible year (2022). If construction is delayed or occurs over a longer period, fuel use could be reduced because of a more modern and fuel efficient construction equipment and vehicle fleet mix, increased use of alternative fuels, and a less intensive and overlapping construction schedule.

Fuel consumed during construction would be temporary in nature and would not represent a significant demand on available fuel, beyond normal construction fuel usage. There are no known Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in Los Angeles County. Los Angeles County and future applicants would be required to demonstrate consistency with policies and actions in the Los Angeles County General Plan and Florence-Firestone Community Plan that are intended to promote efficient energy use. This would include Policy EJ-2.4, Green Building Techniques and related standards, which requires public and private development to incorporate green building techniques, such as construction waste management practices and optimization of energy efficiency measures. Construction contractors would also be required to minimize equipment idling time to a maximum of 5 minutes, hold current certificates of compliance for ARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1], and that all construction equipment be maintained in proper working condition according to manufacturer's specifications and be checked by a certified mechanic to demonstrate it is running in proper condition before it is operated. These actions would help to ensure on-site equipment is operating with maximum fuel efficiency.

In addition, construction contractors of individual future development projects pursuant to the FFTOD Specific Plan would be required to adhere to the Los Angeles County Construction & Demolition (C&D) Debris Recycling and Reuse Ordinance, Chapter 20.87 of the Los Angeles County Code. The Los Angeles County C&D requirements are consistent with CALGreen requirements and require construction contractors to divert a minimum of 50 percent of the construction generated waste from area landfills, depending on the type and intensity of construction. Construction contractors would be required to divert a minimum of 65 percent of the C&D debris by weight and submit a Recycling and Reuse Plan to Los Angeles County's Construction & Demolition Unit for review and approval. Additionally, according to the Los Angeles County Green Building Ordinance, nonresidential construction of 25,000 square feet or more requires implementation of CALGreen Tier 1 voluntary standards, the FFTOD Specific Plan building materials will include a minimum of 10 percent of recycled content based on estimated cost. Therefore, it is expected that fuel consumption associated with construction of the FFTOD Specific Plan would not be any more inefficient, wasteful, or unnecessary than fuel consumption at other construction sites in the region. This impact would be less than significant.

### *Operational Building Energy Consumption*

The FFTOD Specific Plan would result in a net increase of 12,110 dwelling units and approximately 1,183,013 nonresidential square feet. Operation of the proposed land uses in the FFTOD Specific Plan Area would consume energy for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, electronics, office equipment and commercial machinery. Projects under the FFTOD Specific Plan would be constructed to meet currently applicable energy efficiency standards at the time of construction. As discussed in the Regulatory Framework, energy efficiency requirements have and will continue to become more

stringent over time. In accordance with California Code of Regulations Title 20 and Title 24, development under the FFTOD Specific Plan will be required to comply with the building energy standards and California Building Standards Code, including CALGreen. This includes meeting energy standards for water and space heating and cooling equipment, insulation for doors, pipes, walls, and ceilings, and appliances, and other requirements. The CEC projects that the 2019 Building Energy Efficiency Standards will reduce energy demand of new residential construction by 53 percent and that of new nonresidential development by 30 percent relative to comparable buildings constructed under the 2016 California Energy Code, and more so for older buildings (CEC 2018). Implementing these provisions would increase energy efficiency. Furthermore, the SCE base power mix is approximately 36 percent eligible renewable resources and SCE offers power mixes to consumers from 50 and 100 percent renewable sources, ensuring that electricity consumption in the FFTOD Specific Plan Area relies heavily on renewable sources.

Using CalEEMod, electrical and natural gas demands were modeled to estimate energy use, as provided in Table 3.4-3. All buildings were assumed to be designed in compliance with Title 24 2019 Building Energy Efficiency Standards; however, as described previously, California's Building Energy Efficiency Standards are updated on an approximate 3-year cycle. Therefore, it can be presumed that buildings constructed to comply with future iterations of the Building Energy Efficiency Standards would be more efficient and the estimates presented in the table below are conservative.

**Table 3.4-3: Energy Demand—Building Operations**

| Land Use Category | Electrical Demand (kWh/year) | Natural Gas Demand (kBtu/year) |
|---|---|---|
| Residential | 46,414,560 | 109,793,129 |
| Nonresidential | 17,210,379 | 15,664,539 |
| **Total** | 63,624,939 | 125,457,668 |

Notes:
kWh = kilowatt-hours; kBtu = thousand British thermal unit
Sources: Modeled by AECOM in 2021

As denoted in Table 8-3 of the FFTOD Specific Plan Implementation Actions, Action MS-10, Climate Action Plan coordination, would include a performance metric of amending for consistency with the Los Angeles County CAP. The current draft of the Los Angeles County CAP will include major actions that will significantly improve building energy efficiency and on-site renewable energy consistent with the Carbon Neutral Cities Alliance's Framework for Long-Term Deep Carbon Reduction Planning. Therefore, development in the FFTOD Specific Plan Area would be more energy efficient than existing buildings and potentially than new construction in the region that is not otherwise required to exceed existing regulatory building energy requirements and standards. As a result, new projects would be more energy efficient than existing projects of the same type within Los Angeles County that were constructed prior to the existence of energy efficiency standards or under previous less stringent energy efficiency standards. In addition, older buildings tend to decrease in energy efficiency as infrastructure begins to degrade with time. Therefore, the space heating and cooling, lighting, and other operational-related energy uses under the FFTOD Specific Plan would tend to have lower per-capita energy consumption in association with building energy needs that buildings of similar design and operation in Los Angeles County.

### *Operational Transportation-Related Energy Consumption*

Transportation is, by far, the largest energy consuming sector in California, accounting for approximately 40 percent of all energy use in the state (EIA 2020a). Because transportation accounts for more energy consumption than heating, cooling, and powering of buildings, powering industry, or any other use, the travel demand reducing features of the Specific Plan are important for consideration in an assessment of energy efficiency. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west. The LA Metro A Line (previously LA Metro Blue Line), which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations) and operates numerous bus routes in the community. Three freeways (I-110, I-105, I-10) are within a 2.5-mile radius of the community.

The FFTOD Specific Plan Area is currently characterized by a challenging environment for travel across all modes: high vehicle speeds, lack of sufficient pedestrian and bicycle infrastructure, bus stops that lack sufficient amenities like benches and shelters, and degraded pavement quality along some streets. The area lacks an overall cohesive walking network, with large blocks and few protected crossings, while the LA Metro Rail Line creates a mostly impermeable north/south barrier. The miles of bicycle infrastructure are also below average for Los Angeles County.

The intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, encourage transit-oriented development, promote active transportation, improve access to transit, and reduce vehicles miles traveled by cars. The socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan Area include higher densities and more growth than is assumed in Connect SoCal, although the Specific Plan is consistent with Connect SoCal's goals for focusing higher-density development in transit-rich areas. As described in Section 3.14 Transportation, implementation of the FFTOD Specific Plan would result in an average daily vehicle miles traveled per service population that is 33 percent below the 2020 South County Baseline. As such, the FFTOD Specific Plan provides for employment-generating land uses as well as a range of housing options, and implements land use and transportation planning strategies that would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands.

Transportation fuel consumption generated by operations of development in the FFTOD Specific Plan Area was estimated based on the CalEEMod emissions calculations for operational mobile activities associated with land uses and vehicle fleet mix as anticipated within the FFTOD Specific Plan Area. The estimated transportation-related fuel demand associated with buildout of the FFTOD Specific Plan is provided in Table 3.4-4.

**Table 3.4-4: Energy Demand—Building Operations**

| Fuel Type | Gallons per Year | MMBtu per Year |
|---|---|---|
| Diesel | 1,247,322 | 172,249 |
| Gasoline | 5,246,771 | 655,846 |
| **Fuel Type Total** | N/A | **828,096** |

Notes:

MMBtu= Million British thermal units
Sources: Modeled by AECOM in 2021

### *Summary of Impact Analysis*

Energy-requiring activities range from equipment operation during construction, to building operations, to transportation during all phases of the FFTOD Specific Plan implementation. A summary of total energy requirements for development under the FFTOD Specific Plan is provided in Table 3.4-5; for comparison purposes, conversion of all energy requirements to a common energy unit of British thermal units (Btu) per year is also provided.

**Table 3.4-5: Summary of FFTOD Specific Plan Area Energy Requirements**

| Energy Consuming Activity | Diesel Consumption (gallons/year) | Gasoline Consumption (gallons/year) | Electricity Consumption (kWh/year) | Natural Gas Consumption (kBtu/year) | Annual Energy Consumption (MMBtu) |
|---|---|---|---|---|---|
| Construction (amortized over 30 years) | 41,477 | 49,955 | N/A | N/A | 161,643 |
| Building Operations | N/A | N/A | 63,624,939 | 125,457,668 | 342,555 |
| Operational Transportation | 1,247,322 | 5,246,771 | N/A | N/A | 828,096 |
| **Total** | 1,288,800 | 5,296,725 | 63,624,939 | 125,457,668 | 1,332,294 |

Notes:
MMBtu= Million British thermal units; kWh = kilowatt-hours; kBtu = thousand British thermal unit
Sources: Modeled by AECOM in 2021

Operational transportation would be the greatest energy consuming factor associated with implementation of the FFTOD Specific Plan. The FFTOD Specific Plan provides for employment-generating land uses as well as a range of housing options, and implements land use and transportation planning strategies that would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands. Building operations would account for approximately 26 percent of the energy consumption for the FFTOD Specific Plan Area. Compliance with existing regulations, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities would be more energy efficient than existing, average, similar-use buildings, as energy efficiency requirements have become more stringent over time. Considering this information, the FFTOD Specific Plan would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy and this impact is considered less than significant. No mitigation is required.

**ENE-2:** *Conflict with or obstruct a state or local plan for renewable energy or energy efficient?*

As described above in the discussion of Impact ENE-1, implementation of the FFTOD Specific Plan would result in the development of new land uses that would induce new demand for electricity and natural gas, as well as induce additional vehicle miles traveled that would result in the consumption of fossil fuels. However, design and construction of buildings would comply with the most recently adopted California Building Energy Efficiency Standards Code and California Green Building Standards Code (CALGreen), and the Los Angeles County CAP and OurCounty Sustainability Plan. This would ensure that future development would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance

roofs and walls, and high efficacy lighting. Therefore, implementation of the FFTOD Specific Plan would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. This impact is less than significant.

## 3.4.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.4.6 Level of Significance After Mitigation

No programmatic mitigation measures are required. Impacts would be less than significant.

## 3.4.7 Cumulative Impacts

Increased demand for electrical and natural gas supplies and infrastructure is a byproduct of all future land uses and development in Los Angeles County and the region. Energy is consumed for heating, cooling, and electricity in homes and businesses; for public infrastructure and service operations; and for industry and commercial uses. Each service provider is responsible for ensuring adequate provision of these utilities within their jurisdictional boundaries. As described in Section 3.16, Utilities, the existing utility system supplies a sufficient level of electrical service to the FFTOD Specific Plan Area and has adequate capacity to serve the buildout. New development or redevelopments would be responsible for upgrades and undergrounding as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. The Los Angeles County General Plan and associated elements such as the Los Angeles County CAP and OurCounty Sustainability Plan include goals and policies to reduce energy demands through the use of design features, building materials, and building practices; encourage the use of renewable energy sources; promote land uses and patterns that would not cause wasteful, inefficient, and unnecessary consumption of energy; and ensure adequate electricity and natural gas and related distribution systems are available to meet energy demands. In addition, service providers encourage energy conservation through programs, such as offering rebates for installation of energy efficient appliances and lighting fixtures. The CPUC and CEC have roles in regulating energy supply and ensuring reliable and sufficient supplies as the state grows. As noted above, transportation is, by far, the largest energy consuming sector in California, accounting for approximately 40 percent of all energy use in the state (EIA 2020). Because transportation accounts for more energy consumption than heating, cooling, and powering of buildings, powering industry, or any other use, the overall efficiency of energy use in the region will depend importantly on the ability of local lead agencies to plan in a way that reduces travel demand, such as the FFTOD Specific Plan.

As discussed above, the FFTOD Specific Plan would comply with relevant State and local statutes and regulations related to energy efficiency, including the CCR Title 20, Building Energy Regulations, Title 24, Energy Conservation Standards, and Los Angeles County's Green Building Ordinance. The California Green Building Standards Code is updated over time and in each instance, the energy efficiency standards are increased. Because regional transportation and building energy use will become more efficient between present and the FFTOD Specific Plan planning horizon, the regional planning efforts would result in a less-than-cumulatively considerable impact. Therefore, implementation of the FFTOD Specific Plan with regard to the

inefficient, wasteful, or unnecessary consumption of energy and conflict with or obstruction of plans for renewable energy or energy efficiency, would be less-than-cumulatively considerable.

## 3.4.8 References

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# 3.5 GEOLOGY AND SOILS

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact geological and soil resources.

## 3.5.1 Environmental Setting

### 3.5.1.1 Regional Geologic Setting

#### Geology

The FFTOD Specific Plan Area is in the Transverse Ranges Geomorphic Province. The province extends offshore to the west to include the San Miguel, Santa Rosa, and Santa Cruz islands, and to the east to include the San Bernardino Mountains. It is one of the most rapidly rising regions on earth and is seismically active (CGS 2002).

The Transverse Ranges are an anomaly when compared to the general structural grain of the North American Continent. Recent tectonic activity from the middle Miocene and earlier periods account for much of the present rock distribution. The distributions of different crystalline basement rocks demonstrate older tectonic episodes. The distinctive physiography and structural geology of the Transverse Ranges province are overlain on an older pattern of Precambrian through early Cretaceous igneous and metamorphic basement rocks, which generally occur as fault-bounded blocks. Major basement rock boundaries are not only found along the edges of the Transverse Ranges, but they are also encountered within the province (Los Angeles County 2015).

The FFTOD Specific Plan Area is in the southern part of the Transverse Ranges Geomorphic Province in the Los Angeles Basin, which is about 50 miles long and 20 miles wide. The basin is bound on the north by the Santa Monica Mountains and the Elysian, Repetto, and Puente Hills, and on the east and southeast by the Santa Ana Mountains and San Joaquin Hills. The basin's low land surface slopes gently south or seaward toward the Pacific Ocean, but it is interrupted by the Coyote Hills near the northeast margin, by a line of elongated low hills and mesas to the south and west that extends from Newport Bay northwest to Beverly Hills, and by the Palos Verdes peninsula at the southwest extremity. The basin sediment consists of alluvium deposited over millions of years. The FFTOD Specific Plan Area is in the central portion of the Los Angeles Basin, which is underlain by over 1,000 feet of sediments that have been deposited since the Pliocene period. Underlying these alluvial deposits are Pliocene age marine sediments deposited during a time when a shallow sea covered much of southern California (DRP 2017).

The hills bordering the central portion of the Los Angeles Basin are characterized by a complex sequence of Cretaceous to Pleistocene age marine and nonmarine sedimentary rocks. Localized igneous intrusive rocks attest to the complex geologic history of the area. The broad alluvial deposits forming much of the Los Angeles Basin to the south are sourced from the erosion of the hills in the Santa Monica Mountains, north of the site (Los Angeles County 2017).

#### Faults and Seismicity

The Los Angeles Basin, as well as most of Southern California, is in a complex zone of faults and folds resulting from forces occurring along a bend within the boundary between the Pacific and North American tectonic plates. Numerous generally east-west to northwest trending faults have

formed as a result of these north-south forces acting within this area. The major faults in the vicinity of the Los Angeles Basin are characterized by a combination of blind thrusting, which is a rupture below the uppermost layers of rock and would not be present on the surface; right-lateral strike-slip, which is a displacement in a trend or bearing where the right block moves forward and the back block moves away; and reverse faulting, where the rock layer above the fault moves up (Los Angeles County 2017).

Surface fault rupture can occur during significant seismic events. The process generally involves the sudden failure and displacement of the earth's surface along a fault trace or fault zone. The magnitude and geometry of such ground displacement is highly variable. In general, strike-slip faults such as the active San Andreas Fault and Newport-Inglewood Fault are more likely to produce lateral offsets in the ground surface, with one side of the fault plane or zone "sliding" past the opposing side. Similarly, faults that generally fail under compressional stress, such as thrust or reverse faults, are more prone to vertical offsets in the ground surface. In either case, buildings or other human-made structures that are on the surface above the fault can experience serious damage or catastrophic failure during a strong earthquake (Los Angeles County 2015).

Active faults are defined by the State of California as a fault that has had surface displacement within the Holocene time (approximately the last 11,000 years). Most of the larger earthquakes in the region have been associated with larger faults that have been mapped at the ground surface, such as the 1994 Northridge Earthquake, which occurred on the Northridge Thrust fault, and the 1971 San Fernando Earthquake, which occurred on the San Fernando Fault Zone. Several moderate to large earthquakes in the region have also occurred on deep-seated buried thrust faults in this complex geologic region of Southern California. The Alquist-Priolo Earthquake Zoning Act of 1972 provided for the delineation of Earthquake Fault Zones along known active faults.

#### 3.5.1.2 Local

The FFTOD Specific Plan Area is urban and completely developed. The ground surface is generally flat, sloping gently from 175 feet above mean sea level (amsl) in the northwest, to 115 feet amsl in the southeast (Yamazaki et al. 2017). There are no notable topographic features such as hills or rivers within the FFTOD Specific Plan Area.

##### Faults and Seismicity

The California Earthquake Hazards Zone Application Map issued by the California Geological Survey shows no active faults or Alquist-Priolo Earthquake Fault Zones within the FFTOD Specific Plan Area (California Department of Conservation 2019). The closest known fault is the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area and the Upper Elysian Park Fault approximately 5.2 miles north of the FFTOD Specific Plan Area.

##### Liquefaction and Lateral Spreading

Liquefaction is a loss of soil strength due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. According to the Groundwater Wells map managed by the Los Angeles County Public Works, wells within and in the vicinity of the FFTOD Specific Plan Area range from approximately 160 to 200 feet below ground surface (Los Angeles County Public Works

2021). In addition, the California Earthquake Hazards Zone Application Map shows the FFTOD Specific Plan Area is within the Inglewood and South Gate Liquefaction Zones.

Lateral spreading is a phenomenon in which large blocks of intact, nonliquefied soil move downslope on a liquefied soil layer. Lateral spreading is often a regional event. For lateral spreading to occur, a liquefiable soil zone must be laterally continuous, unconstrained laterally in at least one direction and free to move along sloping ground.

### Landslides

The topography of the FFTOD Specific Plan Area is generally flat with no hillside terrain. Additionally, according to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is not in or near a landslide zone.

### Erosion

Erosion is defined as the wearing away of soil and rock by processes such as mechanical or chemical weathering, mass wasting, and the action of waves, wind, and underground water (NRCS 2001a, b). Soil erosion can be accelerated beyond natural rates in areas with depleted plant cover and degraded soil structure resulting from excessive disturbance or reduced organic matter input. The majority of the FFTOD Specific Plan Area is developed for urban land uses, with minimal areas susceptible to erosion. According to the Soil Types Map created by the Los Angeles County Department of Regional Planning (DRP), the approximate northern portion of the FFTOD Specific Plan Area consists of Hanford Fine Sandy Loam soil, while the approximate southern portion consists of Chino Silt Loam soil (DRP 2020).

### Settlement, Subsidence, and Collapsible Soils

Settlement of the ground surface can occur under static forces such as gravity or groundwater removal but can also be accelerated and accentuated by earthquakes. When liquefied ground reconsolidates following an earthquake, the ground surface may settle or subside as shaking decreases and the underlying liquefied soil becomes denser (USGS 2016). The potential for settlement is higher in unconsolidated sediments than in consolidated sediments.

Subsidence is a form of settlement defined as the gradual settling or sudden sinking of the Earth's surface due to subsurface movement of earth materials (USGS 2013). The General Plan does not list subsidence as a safety issue in Los Angeles County (USGS 2014).

Collapsible soils are dry soils that are susceptible to large and sudden volume reduction when they become wet. Soil collapse can occur by water percolating from newly created ponds, irrigation, leakage from soil-lined canals, and storm runoff from roadways and roofs of buildings (Holzer 2006). The General Plan does not identify collapsible soils as a hazard in Los Angeles County.

## 3.5.2 Regulatory Setting

### 3.5.2.1 State

#### California Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Act requires the state geologist to delineate earthquake fault zones along faults that are "sufficiently active" and "well defined." The act requires that cities and counties withhold development permits for a site in an earthquake fault zone until geologic investigations demonstrate that the site is not threatened by surface displacements from future faulting. An active fault is one showing expression of surface rupture within the last 11,000 years. Pursuant to this act, structures for human occupancy are not allowed within 50 feet of the trace of an active fault.

#### Seismic Hazard Mapping Act

The California Seismic Hazard Mapping Act (SHMA) was adopted in 1990 to protect the public from the effects of nonsurface fault rupture earthquake hazards, including strong ground shaking, liquefaction, seismically induced landslides, or other ground failure caused by earthquakes. The act seeks to minimize loss of life and property by identifying and mitigating seismic hazards. The California Geological Survey prepares seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures, and provides them to local governments. SHMA requires responsible agencies to only approve projects within seismic hazard zones following a site-specific investigation to determine if the hazard is present. If the hazard is present, appropriate mitigation is necessary. In addition, SHMA requires real estate sellers and agents at the time of sale to disclose whether a property is within one of the designated seismic hazard zones.

#### California Building Code

The California Code of Regulations, Title 24 (California Building Code [CBC]) applies to applications for building permits. Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission, and the code is updated every 3 years. The current version of the CBC (2019) became effective in 2020. Local jurisdictions may add amendments based on local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and people by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC's provisions for earthquake safety are based on factors such as occupancy type, the types of soil and rock on site, and the strength of ground motion with a specified probability at the site.

CBC Section 1803 includes requirements for geotechnical investigations for subdivisions requiring tentative and final maps and for other types of structures. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of loadbearing soils, the

effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness.

### National Pollutant Discharge Elimination System Construction General Permit

The State of California adopted a Statewide National Pollutant Discharge Elimination System (NPDES) Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ), which has since been amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ. The permit has been administratively extended until a new order is adopted and becomes effective (State Water Resources Control Board 2021). The Construction General Permit regulates construction site storm water. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger development plan that in total disturbs 1 or more acres, are required to obtain coverage under the Construction General Permit for discharges of storm water associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes specific best management practices (BMPs) designed to prevent pollutants from contacting stormwater and being transported off site into receiving waters. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), nonstormwater management (e.g., water conservation), and waste management. The SWPPP also includes descriptions of BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs). Routine inspection of all BMPs is required under the provisions of the Construction General Permit. In addition, the SWPPP is required to include a visual monitoring program, a chemical monitoring program for nonvisible pollutants, and a sediment monitoring plan if the site discharges directly to a waterbody listed on the 303(d) list for sediment.

In the FFTOD Specific Plan Area, the Construction General Permit is implemented and enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB), which administers the stormwater permitting program. Dischargers are required to electronically submit a Notice of Intent and permit registration documents to obtain coverage under this Construction General Permit. Dischargers are responsible for notifying the LARWQCB of violations or incidents of noncompliance, as well as for submitting annual reports identifying deficiencies of the BMPs and how the deficiencies were corrected.

## 3.5.2.2 Local

### Los Angeles County Building Code

The Los Angeles County Building Code also contains rules and regulations that govern activities that could result in soil erosion or slope instability. These rules and regulations are in the Los Angeles County Grading Code Ordinance and Regulations, where provisions for excavation, grading, and earthwork construction have been established, permitting procedures are set forth, and plan approval and grading inspection protocols and procedures have been identified. The stated goal of these ordinances is to promote public safety and welfare by reducing the risk of

death or injury that could result from earthquake damage to certain types of older buildings during moderate or strong earthquakes. Based on the findings of required structural analyses, deficient buildings may need to be strengthened or demolished.

### County of Los Angeles Municipal Separate Storm Sewer System Permit

The FFTOD Specific Plan Area is subject to the waste discharge requirements of the NPDES Permit No. CAS004001 and the County of Los Angeles Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175), which was amended by Order R4-2012-0175-A01 on September 8, 2016 (LARWQCB 2016). The Los Angeles County Flood Control District, Los Angeles County, and 84 incorporated cities in Los Angeles County (except Long Beach) are permittees under the MS4 Permit. The permit contains requirements that are necessary to improve efforts to reduce the discharge of pollutants in stormwater runoff to the maximum extent practicable and achieve water quality standards. This permit requires that runoff is addressed during the major phases of urban development (planning, construction, and operation) in order to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit nonstormwater discharges and protect receiving waters. The MS4 Permit also includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, nonstormwater management and waste management on construction sites.

### Los Angeles County General Plan, Safety Element

The purpose of the Safety Element of the Los Angeles County General Plan is to reduce the potential risk of death, injuries, and economic damage resulting from natural and human-made hazards. The California Government Code requires the General Plan to address the protection of the community from unreasonable risks, including those associated with seismically induced surface rupture, ground shaking, ground failure, slope instability leading to mudslides and landslides, subsidence, liquefaction, and other seismic hazards (DRP 2015). The following goals and policies of the Safety Element that relate to geological and soil resources are applicable to the FFTOD Specific Plan Area:

- Goal S-1: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to seismic and geotechnical hazards
    - Policy S 1.1: Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones
    - Policy S 1.2: Prohibit the construction of most structures for human occupancy adjacent to active faults until a comprehensive fault study that addresses the potential for fault rupture has been completed
    - Policy S 1.3: Require developments to mitigate geotechnical hazards, such as soil instability and land sliding, in Hillside Management Areas through siting and development standards
    - Policy S 1.4: Support the retrofitting of unreinforced masonry structures to help reduce the risk of structural and human loss due to seismic hazards

### County of Los Angeles Low Impact Development Manual

Los Angeles County prepared the 2014 Low Impact Development (LID) Standards Manual to comply with the requirements of the NPDES MS4 Permit for stormwater and nonstormwater

discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4-2012-0175), which was amended by Order R4-2012-0175-A01 on September 8, 2016. The LID Standards provide guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of Los Angeles County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and nonstormwater discharges.

The LID Manual specifies requirements for development. According to the LID Manual, liquefaction-induced settlement of structures and lateral spreading will need to be evaluated if analyses indicate the potential for liquefaction may increase due to stormwater runoff infiltration. In addition, soil amendments must be implemented to avoid potential geotechnical hazards such as liquefaction if the hydraulic conductivity in the soil is not sufficient for the necessary water application rate.

## 3.5.3 Methodology

The following analysis considers the existing environmental setting and regulatory environment applicable to the proposed FFTOD Specific Plan Area related to geology and soils. The following plans and websites were consulted to determine what, if any, identified geologic hazards are situated in the FFTOD Specific Plan Area: Los Angeles County General Plan, U.S. Geological Survey, CGS, California Department of Conservation, LARWQCB, and National Resource Conservation Service.

### 3.5.3.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines and the Los Angeles County Environmental Checklist Form, the proposed project would have a significant impact on geology and soils if it would:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction
- Result in substantial soil erosion or the loss of topsoil
- Be situated on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse
- Be situated 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

The following thresholds were scoped out of the analysis in the Initial Study (Appendix A), and are only described in Chapter 5, Other CEQA Considerations:

- Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - 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 active fault trace?
    - Strong seismic ground shaking?
    - Landslides?

- Would the project have soils incapable of adequately supporting the use of on-site wastewater treatment systems where sewers are not available for the disposal of wastewater?
- Would the project conflict with the Hillside Management Area Ordinance (Los Angeles County Code, Title 22, Ch.22.104)?

## 3.5.4 Environmental Impacts

**GEO-1:** *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: seismic-related ground failure, including liquefaction?*

The project does not propose any new development. Future implementation of the project may involve new development and redevelopment of structures in an area classified as having potential for liquefaction and liquefaction-induced lateral spreading. Liquefaction can occur as a secondary effect of seismic shaking in areas of saturated, loose, fine-to-medium grained soils where the water table is 40 feet or less below ground surface. Seismic shaking temporarily eliminates the grain-to-grain support normally provided by the sediment grains. The waters between the grains assume the weight of the overlying material and the sudden increase in pore water pressure results in the soil losing its friction properties. The saturated material (with the frictionless properties of a liquid) will fail to support overlying structures. Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and slumping. Wells within and in the vicinity of the FFTOD Specific Plan Area range from approximately 160 to 200 feet below ground surface Liquefaction may occur in water-saturated sediment during a moderate to high acceleration of seismic shaking in the FFTOD Specific Plan Area. Furthermore, a certain depth at an individual site is not necessarily an indicator to the area-wide or regional depth to groundwater, and levels are variable.

Liquefaction susceptibility reflects the relative resistance of a soil to loss of strength when subjected to ground shaking. Physical properties of soil such as sediment grain size distribution, compaction, cementation, saturation, and depth govern the degree of resistance to liquefaction. According to the Soil Types Map created by DRP, the approximate northern portion of the FFTOD Specific Plan Area consists of Hanford Fine Sandy Loam soil, while the approximate southern portion consists of Chino Silt Loam soil (DRP 2020). In addition, the California Earthquake Hazards Zone Application Map shows the FFTOD Specific Plan Area is within the Inglewood and South Gate Liquefaction Zones.

Because Southern California is a seismically active area that can produce a high acceleration of seismic shaking, there is potential for exposure of people or structures to liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area. However, conforming to the CBC and Los Angeles County Building Code would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil (Tong 2014). Therefore, future implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading.

**GEO-2:** *Would the project result in substantial soil erosion or the loss of topsoil?*

Although the FFTOD Specific Plan Area is in a developed urban area, future construction activities may include excavation, grading, and other soil-disturbing activities that could result in soil erosion or loss of topsoil during rain or high-wind events. However, for projects disturbing more than 1 acre of ground surface, the Construction General Permit requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs such as sandbags and covering soil stockpiles, which would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Specific developments as part of the FFTOD Specific Plan that disturb less than 1 acre of ground surface would be required to implement at a minimum the BMPs identified in the Los Angeles County MS4 Permit, which includes erosion control and sediment control strategies for small construction sites. Compliance with the Construction General Permit and MS4 Permit requirements would ensure less-than-significant impacts related to erosion and topsoil during construction of specific developments in the FFTOD Specific Plan Area.

The FFTOD Specific Plan Area is completely developed with very few pervious surfaces; as such, new development and redevelopment projects proposed pursuant to the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system. Therefore, the chance of soil erosion and topsoil loss occurring during operation of the new development is low. Depending on the development proposed and the applicable zones with respect to setbacks and minimum landscape requirements, landscaped areas could erode and lose topsoil if not properly designed. However, as part of compliance with the LID Standards, any specific future development project under the FFTOD Specific Plan qualifying as a new development or a redevelopment project would be designed to reduce off-site runoff, promote rainwater harvesting, and reduce erosion and hydrologic impacts downstream. By reducing the velocity and quantity of stormwater on site, the potential for erosion and topsoil loss in landscaped areas caused by runoff is also reduced. The presence of vegetation on landscaped areas would reduce the ability of soil to be eroded and lost by wind erosion. Impacts related to erosion and topsoil loss during operation of proposed development would be less than significant.

**GEO-3:** *Would the project be situated on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

As described above, the FFTOD Specific Plan Area would have no impact related to landslides given that the area is relatively flat. The potential for liquefaction and lateral spreading is addressed in GEO-1. As stated in GEO-1, development in accordance with the FFTOD Specific Plan requires conformance with the CBC and Los Angeles County Building Code that would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil Therefore, the implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to liquefaction and liquefaction-induced lateral spreading.

Development under the FFTOD Specific Plan would be required to adhere to CBC and Los Angeles County Building Code requirements, which include the preparation of a geotechnical investigation by a state licensed geotechnical engineer. The required geotechnical report for any

future development project (new development or redevelopment) pursuant to the FFTOD Specific Plan would determine the susceptibility of the subject site to settlement, subsidence, or collapse and prescribe appropriate engineering techniques for reducing its effects. Site preparation measures such as use of engineered fill, surcharging, wick drains, compaction requirements, and structural slabs could be used. These measures would be evaluated and the most effective, feasible, and economical measures recommended in a geotechnical report would be incorporated into the site design in accordance with the building requirements. Therefore, with adherence to CBC and Los Angeles County Building Code requirements, the potential for unstable soils to adversely affect proposed structures and improvements resulting in settlement, subsidence, or collapse would be less than significant.

**GEO-4:** *Would the project be situated 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?*

Highly expansive soils swell when they absorb water and shrink as they dry and can cause structural damage to building foundations and roads. Therefore, they are less suitable for development than nonexpansive soils. According to the Soil Types Map created by DRP, the approximate northern portion of the FFTOD Specific Plan Area consists of Hanford Fine Sandy Loam soil, while the approximate southern portion consists of Chino Silt Loam soil (DRP 2020). Therefore, expansive soils could be present on site, and implementation of the FFTOD Specific Plan could exacerbate expansive soils hazards, such as by infiltration of stormwater or increasing the amount of irrigation on redevelopment sites.

However, future development project (new development or redevelopment) pursuant to the FFTOD Specific Plan would be required to comply with applicable ordinances set forth by CBC and Los Angeles County and the most recent CBC and Los Angeles County building and seismic codes in effect at the time of project design. In accordance with Section 1803A of the 2019 CBC, a geotechnical investigation is required and must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness as necessary, determined by the Los Angeles County building official. The geotechnical investigation must be prepared by registered professionals (e.g., geotechnical engineer). Recommendations of the report as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the project. Compliance with the CBC and Los Angeles County Building Code would ensure that FFTOD Specific Plan implementation would not substantially increase hazards from expansive soils.

## 3.5.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.5.6 Level of Significance After Mitigation

No programmatic mitigation measures are required.

## 3.5.7 Cumulative Impacts

The area for potential cumulative geology and soils impacts includes the FFTOD Specific Plan Area and immediately adjacent areas because the direct geology and soil impacts are site specific and people and structures within the FFTOD Specific Plan Area could be exposed to hazards from unstable structures immediately adjacent to the area. Future cumulative development could be situated in areas susceptible to strong seismic ground shaking, liquefaction, and lateral spreading, similar to the project. Because future development could be exposed to these impacts, people and structures could be exposed to a high potential for geology and soil impacts. However, as required for all new developments, conforming to the CBC and Los Angeles County Building Code would reduce impacts from strong seismic ground shaking, liquefaction, and liquefaction-induced lateral spreading for future cumulative development to the maximum extent practicable under currently accepted engineering practices. Therefore, cumulative development would result in less-than-significant impacts related to exposing people or structures to strong seismic ground shaking, liquefaction, or liquefaction-induced lateral spreading. Because both the project and cumulative development would result in less-than-significant impacts related to exposing people or structures to hazards from unstable structures the project's contribution to geology and soil impacts would not be cumulatively considerable, and therefore, less than significant.

Topsoil and erosion impacts are also typically site-specific. All cumulative projects adjacent to the FFTOD Specific Plan Area disturbing more than 1 acre of ground surface would be required to implement erosion control and sediment control BMPs as required by their site-specific SWPPPs per Construction General Permit requirements. Cumulative projects not under this disturbance category would be required—at a minimum—to implement erosion and sediment control BMPs listed in the Los Angeles County MS4 Permit. Therefore, cumulative developments would result in less-than-significant erosion and topsoil loss impacts because these projects would be required to comply with existing regulations. Because the projects that would be part of the FFTOD Specific Plan would result in less-than-significant soil erosion and loss of topsoil impacts as described above, the project's contribution to cumulative soil impacts would not be cumulatively considerable, and therefore, less than significant.

## 3.5.8 References

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# 3.6 GREENHOUSE GASES

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to cumulatively contribute to greenhouse gas (GHG) emissions. Because no single project is large enough to result in a measurable increase in global concentrations of GHG emissions, climate change impacts of a project are considered on a cumulative basis. The analysis in this section is based on buildout of the FFTOD Specific Plan, as modeled using the California Emissions Estimator Model (CalEEMod) and trip generation and vehicle miles traveled (VMT) provided by Fehr & Peers. The trip generation and VMT data and GHG emissions modeling for construction and operational phases are provided in Appendix B.

## 3.6.1 Environmental Setting

### 3.6.1.1 Greenhouse Gases and Climate Change

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide ($CO_2$), methane ($CH_4$), and ozone ($O_3$)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide ($N_2O$), sulfur hexafluoride ($SF_6$), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2014).[1] The major GHGs are briefly described below.

- **Carbon dioxide ($CO_2$)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane ($CH_4$)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities
- **Nitrous oxide ($N_2O$)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.
- **Fluorinated gases** are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as high global warming potential (GWP) gases.
    - ***Chlorofluorocarbons (CFCs)*** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere where, given suitable conditions, they

[1] Water vapor ($H_2O$) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, because it is considered part of the feedback loop rather than a primary cause of change.

break down the ozone layer. These gases are therefore being replaced by other compounds that are GHGs covered under the Kyoto Protocol.

- ***Perfluorocarbons (PFCs)*** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [$CF_4$] and perfluoroethane [$C_2F_6$]) were introduced as alternatives, along with hydrofluorocarbons (HFCs), to ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high GWP.
- ***Sulfur Hexafluoride ($SF_6$)*** is a colorless gas soluble in alcohol and ether, and slightly soluble in water. $SF_6$ is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.
- ***Hydrochlorofluorocarbons (HCFCs)*** contain hydrogen, fluorine, chlorine, and carbon atoms. Although they are ozone-depleting substances, they are less potent than CFCs. They have been introduced as temporary replacements for CFCs.
- ***Hydrofluorocarbons (HFCs)*** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high GWP gases. The GWP of GHG emissions are provided in Table 3.6-1, GHG Emissions and Their Relative Global Warming Potential Compared to $CO_2$. The GWP is used to convert GHGs to $CO_2$-equivalence ($CO_2e$) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fifth Assessment Report (AR5) GWP values for $CH_4$, a project that generates 10 metric tons (MT) of $CH_4$ would be equivalent to 280 MT of $CO_2$.[2]

**Table 3.6-1: GHG Emissions and Their Relative Global Warming Potential Compared to CO2**

| GHGs | Second Assessment Report Global Warming Potential Relative to $CO_2$[1] | Fourth Assessment Report Global Warming Potential Relative to $CO_2$[2] | Fifth Assessment Report Global Warming Potential Relative to $CO_2$[2] |
|---|---|---|---|
| Carbon Dioxide (CO2) | 1 | 1 | 1 |
| Methane2 (CH4) | 21 | 25 | 28 |
| Nitrous Oxide (N2O) | 310 | 298 | 265 |
| Hydrofluorocarbons: | | | |
| HFC-23 | 11,700 | 14,800 | 12,400 |
| HFC-32 | 650 | 675 | 677 |
| HFC-125 | 2,800 | 3,500 | 3,170 |
| HFC-134a | 1,300 | 1,430 | 1,300 |
| HFC-143a | 3,800 | 4,470 | 4,800 |

[2] $CO_2$-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

| GHGs | Second Assessment Report Global Warming Potential Relative to $CO_2$[1] | Fourth Assessment Report Global Warming Potential Relative to $CO_2$[2] | Fifth Assessment Report Global Warming Potential Relative to $CO_2$[2] |
|---|---|---|---|
| HFC-152a | 140 | 124 | 138 |
| HFC-227ea | 2,900 | 3,220 | 3,350 |
| HFC-236fa | 6,300 | 9,810 | 8,060 |
| HFC-4310mee | 1,300 | 1,030 | 1,650 |
| Perfluoromethane: CF4 | 6,500 | 7,390 | 6,630 |
| Perfluoroethane: C2F6 | 9,200 | 12,200 | 11,100 |
| Perfluorobutane: C4F10 | 7,000 | 8,860 | 9,200 |
| Perfluoro-2-methylpentane: C6F14 | 7,400 | 9,300 | 7,910 |
| Sulfur Hexafluoride (SF6) | 23,900 | 22,800 | 23,500 |

Notes:
GWP = global warning potential
HFC = hydrofluorocarbon
The IPCC has published updated GWP values in its Fifth Assessment Report (2014) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO2. However, GWP values identified in the Fourth Assessment Report are used by SCAQMD to maintain consistency in statewide GHG emissions modeling. In addition, the 2014 and 2017 Scoping Plan Updates are based on the GWP values in the Fourth Assessment Report.
[1] Based on 100-year time horizon of the GWP of the air pollutant compared to CO2.
[2] The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO2 is not included.
Source: IPCC 1995, 2007, 2014

### 3.6.1.2 California's GHG Emissions

In 2018, emissions from GHG emitting activities statewide were 425 million metric tons (MMT) of $CO_2e$. Combustion of fossil fuel in the transportation category was the single largest source of California's GHG emissions in 2018, accounting for 39.9 percent of total GHG emissions in the state. The transportation category was followed by the industrial and electric power (including in-state and out-of-state sources) categories, which account for 21.0 and 14.8 percent of the state's total GHG emissions, respectively. Other major sectors of GHG emissions include commercial and residential (9.7 percent), agriculture (7.7 percent), high-GWP GHGs (4.8 percent), and recycling and waste (2.1 percent) (CARB 2020).

### 3.6.1.3 Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities. The amount of $CO_2$ in the atmosphere has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million per year since 1960, mainly due to combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the earth's temperature changed the distribution of species, availability

of water, etc. However, human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are also hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas
- Warmer and more frequent hot days and nights over most land areas
- An increase in frequency of warm spells/heat waves over most land areas
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas
- Larger areas affected by drought
- Intense tropical cyclone activity increases
- Increased incidence of extreme high sea level (excluding tsunamis)

#### 3.6.1.4 Potential Climate Change Impacts for California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada. By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase from 4.1 to 8.6°F, depending on emissions levels (CCCC 2012).

In California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures; 2) a smaller fraction of precipitation falling as snow; 3) a decrease in the amount of spring snow accumulation in the lower and middle elevation mountain zones; 4) a shift in the timing of snowmelt of 5 to 30 days earlier in the spring; and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms (CAT 2006). According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, boards, and departments, led by the Secretary of the California Environmental Protection Agency—even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (Table 3.6-1), and the inertia of the Earth's climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks to California are provided in Table 3.6-2, Summary of GHG Emissions Risks to California, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy impacts.

**Table 3.6-2: Summary of GHG Emissions Risks to California**

| Impact Category | Potential Risk |
|---|---|
| Public Health Impacts | Heat waves will be more frequent, hotter, and longer<br>Fewer extremely cold nights<br>Poor air quality made worse<br>Higher temperatures increase ground-level ozone levels |
| Water Resources Impacts | Decreasing Sierra Nevada snowpack<br>Challenges in securing adequate water supply<br>Potential reduction in hydropower<br>Loss of winter recreation |
| Agricultural Impacts | Increasing temperature<br>Increasing threats from pests and pathogens<br>Expanded ranges of agricultural weeds<br>Declining productivity<br>Irregular blooms and harvests |
| Coastal Sea Level Impacts | Accelerated sea level rise<br>Increasing coastal floods<br>Shrinking beaches<br>Worsened impacts on infrastructure |
| Forest and Biological Resource Impacts | Increased risk and severity of wildfires<br>Lengthening of the wildfire season<br>Movement of forest areas<br>Conversion of forest to grassland<br>Declining forest productivity<br>Increasing threats from pest and pathogen<br>Shifting vegetation and species distribution<br>Altered timing of migration and mating habits<br>Loss of sensitive or slow-moving species |
| Energy Demand Impacts | Potential reduction in hydropower<br>Increased energy demand |

Source: CEC 2006; CEC 2009; CCCC 2012; CNRA 2014.

Specific climate change impacts that could affect the project include:

- **Water Resources Impacts.** By late this century, all projections show drying, and half of the projections suggest 30-year average precipitation will decline by more than 10 percent below the historical average. This drying trend is caused by an apparent decline in the frequency of rain and snowfall. Even in projections with relatively small or no declines in precipitation, central and southern parts of the state can be expected to be drier from the warming effects alone—the spring snowpack will melt sooner, and the moisture in soils will evaporate during long dry summer months (CCCC 2012).
- **Wildfire Risks.** Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate related changes in vegetation and ignition potential from lightning. Human activities will continue to be the biggest factor in ignition risk. The number of large fires statewide is estimated to increase from 58 percent to 128 percent above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57 percent to 169 percent, depending on location (CCCC 2012).

- **Health Impacts.** Many of the gravest threats to public health in California stem from the increase of extreme conditions, principally more frequent, more intense, and longer heat waves. Particular concern centers on the increasing tendency for multiple hot days in succession and heat waves occurring simultaneously in several regions throughout the state. Public health could also be affected by climate change impacts on air quality, food production, the amount and quality of water supplies, energy pricing and availability, and the spread of infectious diseases. Higher temperatures also increase ground-level ozone levels. Furthermore, wildfires can increase particulate air pollution in the major air basins of California (CCCC 2012).
- **Increase Energy Demand.** Increases in average temperature and higher frequency of extreme heat events combined with new residential development across the state will drive up the demand for cooling in the increasingly hot and longer summer season and decrease demand for heating in the cooler season. Warmer, drier summers also increase system losses at natural gas plants (reduced efficiency in the electricity generation process at higher temperatures) and hydropower plants (lower reservoir levels). Transmission of electricity will also be affected by climate change. Transmission lines lose 7 percent to 8 percent of transmitting capacity in high temperatures while needing to transport greater loads. This means that more electricity needs to be produced to make up for the loss in capacity and the growing demand (CCCC 2012).

#### 3.6.1.5 Existing Conditions

The vast majority of Los Angeles County's GHG emissions comes from the combustion of fossil fuels (including gasoline, diesel, and natural gas) in the processes used to propel motor vehicles, generate electric power, and produce heat and hot water for buildings and facilities. Sixty-two percent of GHG emissions in unincorporated areas come from the transportation sector, and most transportation emissions come from passenger vehicles that include cars and light trucks. Another 30 percent of GHG emissions is tied to energy use in buildings and facilities, including power plants, business, and homes. The remaining greenhouse gasses come from industry (product use), agriculture, and waste (Los Angeles County 2021).

The FFTOD Specific Plan Area currently generates direct and indirect GHG emissions from vehicle trips, energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), area sources (e.g., equipment used, consumer products, coatings), water/wastewater generation, and waste disposal.

### 3.6.2 Regulatory Setting

This section describes the federal, state, and local regulations applicable to GHG emissions.

#### 3.6.2.1 Federal Laws

The U.S. Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings did not themselves impose any emission reduction requirements, but

allowed the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (EPA 2009).

To regulate GHGs from passenger vehicles, EPA was required to issue an endangerment finding. The finding identifies emissions of six key GHGs—$CO_2$, $CH_4$, $N_2O$, hydrofluorocarbons, perfluorocarbons, and $SF_6$— that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world.

## U.S. Mandatory Report Rule for GHGs

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MT or more of $CO_2e$ per year are required to submit an annual report.

## Corporate Average Fuel Economy Standards

The current Corporate Average Fuel Economy standards (for model years 2011–2016) incorporate stricter fuel economy requirements promulgated by the federal government and California into one uniform standard. Additionally, automakers are required to cut GHG emissions in new vehicles by roughly 25 percent by 2016 (resulting in a fleet average of 35.5 miles per gallon by 2016). Rulemaking to adopt these new standards was completed in 2010. California agreed to allow automakers who show compliance with the national program to also be deemed in compliance with state requirements. The federal government issued new standards in 2012 for model years 2017–2025 that will require a fleet average of 54.5 miles per gallon in 2025. However, the EPA is reexamining the 2017–2025 emissions standards. However, on April 2, 2018, EPA issued a Mid-term Evaluation Final Determination, which finds that the model year 2022 through 2025 emissions standards are not appropriate and should be revised. This Mid-term Evaluation is not a final agency action; rather, this determination led to the rule making of the Safer Affordable Fuel Efficient (SAFE) Vehicles Rule (EPA 2018).

In September 2019, the National Highway Traffic Safety Agency (NHTSA) and the EPA published the SAFE Vehicles Rule Part One: One National Program. The SAFE Part One Rule revokes California's authority and vehicle waiver to set its own emissions standards and set zero emission vehicle mandates in California for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. On March 31, 2020, the EPA and NHTSA issued the second part of the proposed SAFE Vehicles Rule. This final rule became effective on June 29, 2020. The Final SAFE Rule relaxed the federal GHG emissions and fuel economy standards to increase in stringency at only about 1.5 percent per year from model year 2020 levels over model years 2021–2026. The previously established emission standards and related "augural" fuel economy standards would have achieved about 5 percent per year improvements through model year 2025 (NHTSA 2020). During the period the federal action is in effect, the California Air Resources Board (CARB) will administer the affected portions of its program on a voluntary basis. On January 20, 2021, President Biden signed an Executive Order directing consideration of labor unions, States, and industry views to propose suspension, revision, or rescindment of the SAFE Vehicles Rule (The White House 2021).

### EPA Regulation of Stationary Sources under the Clean Air Act (Ongoing)

Pursuant to its authority under the Clean Air Act, the EPA has been developing regulations for new stationary sources such as power plants, refineries, and other large sources of emissions. In 2015, EPA issued final regulations to limit GHG emissions from new fossil fuel-fired utility boilers and from natural gas-fired stationary combustion turbines. Those emission limits remain in place today. In 2018, EPA proposed to amend the limits for newly constructed coal-fired units. EPA did not propose to amend the standards of performance for newly constructed or reconstructed stationary combustion turbines. In January 2021, EPA issued a final rule for determining when standards are appropriate for GHG emissions from stationary source categories under Clean Air Act section 111(b)(1)(A). EPA did not take final action to revise the 2015 final rule. On March 17, 2021, in line with President Biden's Executive Order 13990 on "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis," EPA asked the D.C. Circuit to vacate and remand the "significant contribution" final rule. The rule was promulgated without public notice or opportunity to comment. On April 5, 2021, the D.C. Circuit vacated and remanded the January 2021 final rule.

## 3.6.2.2 State

The CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act.

### Executive Order S-03-05

Executive Order S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

The statewide GHG emissions in 2000 were approximately 466 MMT $CO_2e$ (CARB 2014). In 2010, overall statewide GHG emissions were approximately 453 MMT $CO_2e$, exceeding the 2010 goal established by Executive Order S-3-05 (CARB 2014).

### Assembly Bill 32, the Global Warming Solutions Act (2006)

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in the Global Warming Solutions Act. Assembly Bill (AB) 32 was passed by the California State Legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-03-05.

### Executive Order B-30-15

Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for

2050 in Executive Order S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, Safeguarding California, in order to ensure climate change is accounted for in state planning and investment decisions.

### Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed Senate Bill 32 and Assembly Bill 197 into law, making the Executive Order goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

### CARB 2017 Climate Change Scoping Plan

Executive Order B-30-15 and Senate Bill (SB) 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. In November 2017, CARB released the 2017 Climate Change Scoping Plan, which establishes a framework of action for California to reduce statewide emissions by 40 percent by 2030, compared to 1990 levels (CARB 2017b). The 2017 Scoping Plan builds upon the framework established by the 2008 Scoping Plan and the 2014 Scoping Plan Update, while also identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets. The 2017 Scoping Plan establishes a new emissions limit of 260 MMT $CO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 (CARB 2017).

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero emission vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conserve agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically situated adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero emission buses and trucks
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030)
- Implementation of SB 350, which expands the Renewables Portfolio Standard (RPS) to 50 percent RPS and doubles energy efficiency savings by 2030
- California Sustainable Freight Action Plan, which improves freight system efficiency, uses near-zero emissions technology, and deployment of zero emission trucks
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing methane and hydroflurocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030

- Continued implementation of SB 375
- Post-2020 Cap-and-Trade Program that includes declining caps
- 20 percent reduction in GHG emissions from refineries by 2030[3]
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink

In addition to the statewide strategies listed above, the 2017 Climate Change Scoping Plan also identified local governments as essential partners in achieving the state's long-term GHG reduction goals and identified local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 $MTCO_2e$ or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For California Environmental Quality Act (CEQA) projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the state's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible, or a performance-based metric using a climate action plan or other plan to reduce GHG emissions as appropriate (CARB 2017).

### Southern California Association of Governments Regional Transportation Plan and Sustainable Communities Strategy and Regional Transportation Improvement Program

The Southern California Association of Governments (SCAG) develops the Regional Transportation Plan (RTP), which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura counties. SB 375 was enacted to reduce GHG emissions from motor vehicles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, SCAG is tasked with developing a Sustainable Communities Strategy (SCS), an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. The SCS outlines the plan for integrating 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 SCS focuses the majority of new housing and job growth in high quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The Regional Transportation Improvement Programs, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements within the next 5 to 7 years. To qualify for CEQA streamlining benefits under SB 375, a project must be consistent with the RTP/SCS.

The 2020–2045 RTP/SCS, also known as Connect SoCal, is a long-range visioning plan that builds on and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a

[3] The plan includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources in accordance with AB 197. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources.

more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020). The SCAG Regional Council adopted Connect SoCal on September 3, 2020.

### Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards under Federal Laws, above). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. However, as described above, the SAFE Part One Rule revoked California's authority and vehicle waiver to set its own emissions standards and set zero emission vehicle mandates in California for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. During the period the federal action is in effect, the CARB will administer the affected portions of its program on a voluntary basis. On January 20, 2021, President Biden signed an Executive Order directing consideration of labor unions, States, and industry views to propose suspension, revision, or rescindment of the SAFE Vehicles Rule (The White House 2021).

### Executive Order S-01-07

On January 18, 2007, the state set a new low carbon fuel standard (LCFS) for transportation fuels sold within the state. Executive Order S-01-07 sets a declining standard for GHG emissions measured in carbon dioxide equivalent gram per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applies to refiners, blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the "fuel cycle" using the most economically feasible methods.

### Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

A major component of California's Renewable Energy Program is the RPS established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SBX1-2). Renewable

sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects, because electricity production from renewable sources is generally considered carbon neutral.

### Senate Bill 350

Senate Bill 350 (de Leon), was signed into law September 2015. SB 350 establishes tiered increases to the RPS of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

### Executive Order B-16-2012

On March 23, 2012, the state identified that CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). The executive order also directs the number of zero-emission vehicles in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are zero-emission by 2015 and at least 25 percent by 2020. The executive order also establishes a target for the transportation sector of reducing GHG emissions from the transportation sector 80 percent below 1990 levels.

### California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2016 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which went into effect on January 1, 2020.

The 2019 Standards continues to improve upon the previous 2016 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2019 Standards, residential and nonresidential buildings are 53 and 30 percent more energy efficient than the 2016 Standards, respectively (CEC 2018).

### California Building Code: CALGreen

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation,

and internal air contaminants.[4] The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011, and were last updated in 2019. The 2019 Standards became effective on January 1, 2020.

### 2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and nonfederally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

### Solid Waste Regulations

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code Section 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses.

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code Section 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Section 5.408 of the 2013 California Green Building Standards Code also requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

In October of 2014 Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings that consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

[4] The green building standards became mandatory in the 2010 edition of the code.

### Water Efficiency Regulations

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

## 3.6.2.3 Local

### Los Angeles County General Plan

The General Plan guides growth countywide through goals, policies, and programs that discourage sprawling development patterns; protect areas with hazard, environment and resource constraints; encourage infill development in areas near transit, services and existing infrastructure; and make a strong commitment to ensuring sufficient services and infrastructure. It also lays the foundation for future community-based planning initiatives that will identify additional opportunities for accommodating growth. The General Plan includes the following climate change-related policies:

- **Policy AQ 3.1:** Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that Los Angeles County reaches its climate change and greenhouse gas emission reduction goals
- **Policy AQ 3.3:** Reduce water consumption in Los Angeles County operations
- **Policy AQ 3.5:** Encourage energy conservation in new development and municipal operations
- **Policy AQ 3.6:** Support rooftop solar facilities on new and existing buildings

### Los Angeles County Community Climate Action Plan

Los Angeles County prepared a Final Unincorporated Los Angeles County Community Climate Action Plan 2020 (CCAP). The CCAP was adopted as part of the Los Angeles County General Plan 2035 on October 6, 2015. The plan addressed Los Angeles County's local GHG reduction goals for 2020 pursuant to AB 32. The purpose of the CCAP is to: 1) establish a baseline emissions inventory and reduction needed to meet Los Angeles County goals; 2) identify specific actions that will measurably reduce GHG emissions consistent with AB 32; 3) establish a framework for implementing state and local level actions; and 4) provide a mechanism for ongoing tracking and updates to the CCAP.

As part of the CCAP, Los Angeles County identified a GHG reduction target of at least 11 percent below 2010 levels by 2020. The CCAP identified 26 local actions to reduce community-wide GHG reductions in 2020 to reach the GHG reduction goal for the unincorporated areas of Los Angeles County (unincorporated areas). As identified in the CCAP, the community and statewide actions would reduce GHG emissions in the unincorporated areas by more than 1.95 MMT $CO_2e$. This CCAP expired in 2020 and is in the process of being updated as described below.

### Los Angeles County Climate Action Plan (In Progress)

Los Angeles County adopted the 2020 Community Climate Action Plan (CCAP), which describes Los Angeles County's plan to reduce the impacts of climate change by reducing GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. Los Angeles County's existing CCAP document was adopted by the Board of Supervisors in 2015 as a component of the Los Angeles County General Plan 2035; it expired in 2020 and will be replaced by the Los Angeles County Climate Action Plan (CAP). The Los Angeles County CAP will tie together existing climate change initiatives and provide a blueprint for deep carbon reductions. Through this updated CAP, Los Angeles County is targeting carbon neutrality by 2045 in unincorporated Los Angeles County.

The Los Angeles County CAP will outline actions that Los Angeles County plans to take to reduce GHG emissions and adapt to a changing climate in unincorporated areas. The Los Angeles County CAP will include a GHG inventory and a roadmap for addressing emissions from stationary energy (used by buildings and other facilities), transportation, waste, industrial, agricultural, and land use sectors. Mitigation measures identified in the plan will also yield community co-benefits, including improvements in air quality, public health, mobility, and resilience.

## 3.6.3 Methodology

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely to occur in conjunction with the project. The South Coast Air Quality Management District (SCAQMD) has published guidelines that are intended to provide local governments with guidance for analyzing and mitigating environmental impacts and which were used in this analysis. Modeling of GHG was conducted using CalEEMod, version 2020.4.0. Industrial sources of emissions that require a permit from SCAQMD (permitted sources) are not included in the FFTOD Specific Plan community inventory because they have separate emission reduction requirements. GHG modeling is provided in Appendix B.

The analysis in this section is based on buildout of the proposed project as modeled using CalEEMod, version 2020.4.0, for the following sectors:

- Transportation—On-road transportation sources are based on trip generation rates and VMT provided by Fehr and Peers (see Appendix B).
- Energy Use—Electricity and natural gas use is based on the rates identified in the most recent version of CalEEMod version 2020.4.0, which includes updated carbon intensity for Southern California Edison's electricity and incorporation of the 2019 Building Energy Efficiency Standards.
- Water/Wastewater—GHG emissions from this sector are associated with the embodied energy used to supply water, treat water, distribute water, and then treat wastewater and

fugitive GHG emissions from wastewater treatment. Emissions are based on wastewater consumption defaults in CalEEMod.

- Solid Waste Disposal—Indirect emissions from waste generation are based on the solid waste generation rates provided by CalEEMod defaults, which are based on annual waste disposal rates identified by CalRecycle.
- Area Sources—GHG emissions from this sector are from use of landscaping equipment used for property maintenance and consumer products (e.g., cleaning supplies).
- Construction—GHG emissions are from construction-related vehicle and equipment use are based on a worst-case emissions scenario for buildout of the FFTOD Specific Plan. Because there is no defined development schedule for these future projects at this time, the maximum daily emissions are based on a very conservative scenario, where 25 percent of all land uses within the FFTOD Specific Plan Area could be developed within the earliest possible construction year (2022). Due to the size of the FFTOD Specific Plan Area and variability of land uses, as well as the uncertainty of the construction timing, it was assumed that different types of construction activities (e.g., site preparation, grading, paving, building construction, and application of architectural coatings) could occur simultaneously at various locations in the FFTOD Specific Plan Area.

#### 3.6.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on GHG emissions if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs

As stated in the CEQA Guidelines, these questions are "intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance" (Title 14, Division 6, Chapter 3 Guidelines for Implementation of the CEQA, Appendix G, VII Greenhouse Gas Emissions). The CEQA Guidelines require lead agencies to adopt GHG thresholds of significance. When adopting these thresholds, the Guidelines allow lead agencies to develop their own significance threshold and/or to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence.

Section 15064.4 of the CEQA Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

> (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

> (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
>
> (2) Rely on a qualitative analysis or performance-based standards.

Typically, the lead agency adopts the thresholds of the air district which has jurisdiction over a project. While SCAQMD has issued proposed standards and guidelines, there is no adopted state or local standard for determining the cumulative significance of the proposed Specific Plan's GHG emissions. Additionally, SCAQMD has proposed, but not adopted, a 3,000 MT/year $CO_2e$ threshold for mixed-use developments, a 3,500 MT/year $CO_2e$ threshold for residential developments, and a 1,400 MT/year $CO_2e$ threshold for commercial developments. As an alternative to the aforementioned proposed thresholds for residential, commercial, and mixed-use developments, SCAQMD has also recommended the use of a single numerical threshold of 3,000 $MTCO_2e$/year for all non-industrial projects (SCAQMD 2010). These thresholds were developed for individual land use projects and are not effective for larger projects such as specific plans.

As stated above, for larger projects that do not meet any of the above screening thresholds, the SCAQMD has proposed efficiency thresholds for planning level documents of 6.6 MT $CO_2e$ per service population (SP) annually for 2020, and 4.1 MT $CO_2e$ per SP annually for 2035. However, these SCAQMD thresholds have not been formally adopted and were based on dividing the statewide GHG emissions target goal (from applicable land use sectors) by the estimated 2020 population and employment, thereby determining the level of GHG efficiency for projects that would achieve the goals of AB 32. Implementation of the FFTOD Specific Plan would begin post-2020; therefore, emissions associated with development of the FFTOD Specific Plan should also be analyzed in the SB 32 statewide framework (which established a 2030 GHG emissions reduction target of 40% below 1990 levels). The SCAQMD has not proposed a service population efficiency metric or threshold of significance consistent with SB 32 goals. To provide this additional information to put the project-generated GHG emissions in the appropriate statewide context, this analysis updates the service population threshold that would meet the State's 2030 and 2050 emissions targets.

As such, this analysis relies on the FFTOD Specific Plan's ability to demonstrate consistency with California's GHG emissions reduction goals as a threshold for determining significance with regard to determining if the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. AB 32 and SB 32 demonstrate California's commitment to reducing GHG emissions and the state's associated contribution to climate change, without intending to limit population or economic growth within the state. Table 3.6-3 shows California's 2020, 2030, and 2050 emissions targets based on the approved 1990 limit of 431 MMT $CO_2e$.

**Table 3.6-3: Statewide Emissions Inventory and Reduction Targets**

| | 1990 | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Statewide Emissions Targets (MMT $CO_2e$) | 431.0 [1] | 431.0 [1] | 258.6 [2] | 86.2 [3] |
| Amount below 1990 Levels | 0% | 0% | 40% | 80% |

Note: MMT $CO_2e$ = million metric tons of carbon dioxide equivalent
[1] California 1990 Greenhouse Gas Emissions Level and 2020 Limit, ARB: http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm
[2] 40% below 1990 levels (i.e., 2020 target levels) per SB 32
[3] 80% below 1990 levels (i.e., 2020 target levels) per Executive Order S-3-05

To achieve the goals of AB 32 and SB 32, which are tied to statewide GHG emission levels of a specific benchmark year (i.e., 1990), California would have to achieve a lower rate of emissions per unit of population (per person) and/or per level of economic activity (e.g., per job) than its current rate. The "per capita" or "per service population" metrics represent the rates of emissions needed to achieve a fair share of California's emission reduction mandate.[5] Fair share indicates the level of GHG efficiency that, if applied statewide or to a defined geographic area, such as the FFTOD Specific Plan Area, would meet the state's emissions targets for 2030 and future years.

For this reason, land uses need to be GHG "efficient" to attain AB 32 and SB 32 goals while also accommodating population and job growth. Therefore, this analysis focuses on the annual GHG emissions for the FFTOD Specific Plan Area per service population (annual GHG emissions divided by the service population), where service population is the number of FFTOD Specific Plan residents plus the number of FFTOD Specific Plan employees.[6]

To develop the service-population-based efficiency threshold for the FFTOD Specific Plan, land use-related sectors in California's 1990 GHG Emissions Inventory were identified and GHG emissions were separated to tailor the inventory to emission sources that are relevant to the FFTOD Specific Plan proposed land uses. This exercise was completed to identify the emissions sources over which Los Angeles County can have some influence through planning and development approval. For example, it would be infeasible for Los Angeles County to develop emissions strategies that address the full scope of statewide emissions. Emissions sources not within the FFTOD Specific Plan are not included in the development of the GHG efficiency threshold. For example, this approach excludes emissions associated with agriculture, mining, ships and commercial boats, and other emissions sources not associated with FFTOD Specific Plan activities.

Tailoring the reduction target to the specific local context speaks to the direction from the California Supreme Court's 2015 decision in *Center for Biological Diversity v. California Department of Fish and Wildlife,*[7] commonly referred to as "Newhall Ranch." In Newhall Ranch, the Court indicated that the use of a state-legislation–based significance threshold could be acceptable, so long as the administrative record supports how this threshold is appropriate for a

[5] Per-capita emissions are total emissions divided by the residential population of the proposed project or plan. Per-service population emissions are total emissions divided by the residential population plus the employment accommodated by the project or plan.
[6] The service population associated with the net new development under the FFTOD Specific Plan is estimated to be 37,441 in 2035.
[7] 62 Cal. 4th 204.

specific project at a specific location. The following tables and paragraphs provide further detail on tailoring state guidance to local conditions.

If the FFTOD Specific Plan emissions per service population are less than the efficiency threshold, the impact would be less than cumulatively considerable for the target years. A revised version of the 1990 statewide emissions (Table 3.6-3) that includes only the sectors and subsectors relevant to the FFTOD Specific Plan is provided in Table 3.6-4.

**Table 3.6-4: Adjusted Statewide Emissions Inventory—Land Use-Related Sectors**

| Main Sector / Sub Sector Level 1 | Total Emissions (MMT $CO_2e$/yr) [1] | Adjusted Land Use-Related Emissions (MMT $CO_2e$/yr) | Notes/Adjustments |
|---|---|---|---|
| Agriculture & Forestry | **18.9** | 0.0 | Not included in land use sector |
| Commercial | **14.4** | 13.9 | Excludes National Security emissions |
| Electricity Generation (Imports) | **61.5** | 61.5 | Land use sector includes all emissions |
| Electricity Generation (In State) | **49.0** | 34.4 | Excludes CHP: Industrial |
| Industrial | **105.3** | 11.7 | Industrial emissions excluded from land use sector, except as described in sub sectors below |
| *CHP: Industrial* | **9.7** | 0.0 | Not included, included CHP in electricity generation and commercial sector |
| *Flaring* | **0.1** | 0.0 | |
| *Landfills* | **7.4** | 7.4 | |
| *Manufacturing* | **32.1** | 0.7 | Construction emissions included in land use sector |
| *Mining* | **0.0** | 0.0 | |
| *Not Specified* | **2.7** | 0.0 | |
| *Oil & Gas Extraction* | **14.8** | 0.0 | |
| *Petroleum Marketing* | **0.0** | 0.0 | |
| *Petroleum Refining* | **32.8** | 0.0 | |
| *Pipelines* | **1.9** | 0.0 | |
| *Wastewater Treatment* | **3.6** | 3.6 | Waste water treatment emissions are included in community-wide GHG inventory |
| Not Specified | **1.3** | 1.3 | Land use sector includes all emissions |
| Residential | **29.7** | 29.7 | Land use sector includes all emissions |
| Transportation | **150.6** | 140.9 | Excludes Aviation, Rail, and Water-borne emissions |
| **Total** | **431.0** | **293.5** | |

Notes:
CHP = combined heat and power
Sectors/sub sectors may not sum exactly due to rounding
[1] California 1990 Greenhouse Gas Emissions Level and 2020 Limit, ARB: http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm

The statewide inventory was tailored to emissions sources that are relevant to the FFTOD Specific Plan so that emissions in future years can be compared with California's own targets for the relevant land uses—namely, for 2030, under SB 32; and for 2050, under Executive Order S-3-05. After culling the emissions sources to those that are relevant for the FFTOD Specific Plan, the second step is developing an appropriate "rate" of emissions. In this case, because the FFTOD Specific Plan would have both a residential component and an employment component, "service population" was the selected metric used to convert mass emissions to a rate of emissions.

California has mass emissions targets for future years. State agencies also forecast future residential population and employment for future years. If one simply divides the mass emissions target by the total residential population and employment, this yields emissions "budget" per population plus employment that is consistent with state GHG goals. If a project or plan has a rate of GHG emissions per service population that is equal to, or less than the state's GHG rate for future years, then that project or plan can demonstrate consistency with the state's GHG goals. In this case, if the FFTOD Specific Plan's emissions rates are consistent with the state's goals, it can be concluded that implementation of the FFTOD Specific Plan would make substantial progress toward the state's 2030 goals and set a trajectory that is consistent with the state's 2050 goal. The application of an efficiency-based metric as is described herein is consistent with the discussion in CARB's 2017 Scoping Plan (ARB 2017) of the importance of GHG efficiency in land use planning. The 2017 Scoping Plan provides the following guidance on the application of an efficiency-based metric:

> Since the statewide per capita targets are based on the statewide GHG emissions inventory that includes all emissions sectors in the State, it is appropriate for local jurisdictions to derive evidence-based on local per capita goals based on local emissions sectors and population projections that are consistent with the framework used to develop the statewide per capita targets. The resulting GHG emissions trajectory should show a downward trend consistent with the statewide objectives.

Thus, future development would have to improve efficiency to be consistent with the goals SB 32 and Executive Order S-3-05.

The estimated statewide land use-related GHG emissions per service population target in 2035 are provided in Table 3.6-5. The 2035 GHG emissions target for the FFTOD Specific Plan was selected to coincide with the 2035 planning horizon of the FFTOD Specific Plan, and represents a linear extrapolation between the state's 2030 and 2050 targets. The 2035 efficiency target was derived using the state targets for 2030, under SB 32, and for 2050, under Executive Order S-3-05. Therefore, meeting the 2035 efficiency target would demonstrate a downward GHG emissions trajectory and progress consistent with statewide goals, including the statewide 2050 goal.

**Table 3.6-5: Local Service Population Efficiency Target[1]**

| | 2035 |
|---|---|
| Emissions Targets (MT $CO_2e$/yr) | 146,735,783 |
| Population [2] | 42,718,403 |
| Employment [3] | 19,575,042 |
| Service Population (SP) | 62,293,445 |
| Emissions per Service Population (MT $CO_2e$/SP) | 2.36 |

Note:
MT $CO_2e$ = million metric tons of carbon dioxide equivalent; Service population defined as the sum of population and employees.
Sources:
[1] Based on FFTOD Specific Plan-specific land uses
[2] California Department of Finance 2021.
[3] California Employment Development Department 2020. Long Term Projections 2018-2028 https://www.labormarketinfo.edd.ca.gov/data/employment-projections.html. 2035 Data is extrapolated based upon Employment to Population Ratio for 2028, and assumes consistent ratio. Sorted to remove jobs from: 11-9013 Farmers, Ranchers, and Other Agricultural Managers; 19-4041 Geological and Petroleum Technicians; 19-4093 Forest and Conservation Technicians; 45-000 Farming, Fishing, and Forestry Occupations; 47-5000 Extraction Workers; 49-3011 Aircraft Mechanics and Service Technicians; 49-3041 Farm Equipment Mechanics and Service Technicians; 49-9041 Industrial Machinery Mechanics; 49-9043 Maintenance Workers, Machinery; 49-9044 Millwrights; 51-0000 Production Occupations; 53-2000 Air Transportation Workers; 53-4000 Rail Transportation Workers; and 53-5000 Water Transportation Workers.

After 2035, it is projected that GHG emissions will continue to decrease due to a mix of voluntary, incentive-based, and regulatory actions. However, as noted in *Cleveland National Forest Foundation, et al. v. San Diego Association of Governments* (SANDAG) (2017),[8] SANDAG has concluded that "there are presently no reliable means of forecasting how future technological developments or state legislative actions to reduce greenhouse gas emissions may affect future emissions in any one planning jurisdiction…lead agencies can only guess how future technical developments or state (or federal or international) actions may affect emissions from the myriad of sources beyond their control." As noted by the Court in this decision, "CEQA does not require analysis of potential impacts from possible future development that are too speculative to evaluate." The Court determined in this case that SANDAG did not abuse its discretion in declining to adopt a 2050 reduction goal.

Construction activities associated with buildout of the FFTOD Specific Plan would also generate GHG emissions from the use of construction equipment, haul trucks, and worker vehicles. The SCAQMD has not adopted thresholds for evaluating GHG emissions from construction activities. Direct comparison of construction GHG emissions with long-term thresholds would not be appropriate because these emissions cease on completion of construction. The SCAQMD recommends that construction emissions associated with a project be amortized over the life of the project (typically assumed to be 30 years). Therefore, this analysis includes a quantification of the total construction-related GHG emissions (which includes the worst-case assumption that 25 percent of all land uses would be constructed in a single year and is multiplied by 4 to estimate total construction-related emissions). Those emissions are then amortized over the life of the project (assumed to be 30 years) and added to the operational emissions associated with the project

[8] 3 Cal.5th 497, 517

for comparison with the threshold of 2.36 MT $CO_2e$ per SP designed for this analysis and provided in Table 3.6-5.

## 3.6.4 Environmental Impacts

**GHG-1:** *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Implementation of the FFTOD Specific Plan would contribute to global climate change through direct and indirect emissions of GHG from construction and operation of the land uses within the FFTOD Specific Plan Area. Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the proposed project would result in exhaust-related GHG emissions. As described previously, GHG emissions from construction activities are amortized into the operational phase GHG emissions inventory to account for one-time emissions from construction in accordance with SCAQMD methodology.

After construction, day-to-day activities associated with operation of the project would generate emissions from a variety of sources. The analysis estimated operational GHG emissions from sources such as mobile, electricity and natural gas, solid waste, water and wastewater, and area-source emissions associated with implementation of the FFTOD Specific Plan. Buildout of the FFTOD Specific Plan would result in 12,110 dwelling units and approximately 1,183,013 nonresidential square feet. Buildout of the FFTOD Specific Plan is not linked to a specific development time frame, but the horizon year for the Project is 2035 (build out assumed over approximately 15 years).

The amortized construction-related, total and net increase of GHG emissions that are associated with the buildout of the FFTOD Specific Plan are provided in Table 3.6-6. Operation of the FFTOD Specific Plan would result in a net increase of 95,613 MT $CO_2e$ per year at buildout of the project. As shown in the table, the FFTOD Specific Plan would exceed the local service population efficiency 2035 target of 2.36 MT $CO_2e$.

**Table 3.6-6: FFTOD Specific Plan Net New GHG Emissions**

| Source/Category | GHG Emissions (MT $CO_2e$) |
|---|---|
| Amortized Construction | 865 |
| Area | 13,248 |
| Energy | 18,076 |
| Mobile | 55,278 |
| Waste | 3,726 |
| Water | 4,420 |
| **Total Net New GHG Emissions** | **95,613** |
| **Net Emissions Per Service Population (MT $CO_2e$/SP)[1]** | **2.55** |
| 2035 Efficiency Threshold (MT $CO_2e$/SP) | 2.36 |
| **Exceeds Threshold?** | Yes |

Notes: Estimated by AECOM in 2021. Additional details provided in Appendix B. Totals may not add due to rounding.
[1]Net emissions per service population calculated by dividing the net new emissions associated with buildout of the FFTOD Specific Plan by the number of employees and residents within the Specific Plan. The net new service population associated with the net new development under the FFTOD Specific Plan is approximately 37,441.
MT $CO_2e$ = metric tons of carbon dioxide equivalent; SP = service population; GHG = greenhouse gas

As shown in the table, the FFTOD Specific Plan would exceed the local service population efficiency 2035 target of 2.36 MT $CO_2e$. Therefore, the FFTOD Specific Plan's cumulative contribution to the long-term GHG emissions in the state would be considered potentially significant.

**GHG-2:** *Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, SCAG's 2020–2045 RTP/SCS, and the Los Angeles County CCAP. A consistency analysis with these plans is presented below:

### 3.6.4.1 CARB Scoping Plan

In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the state's strategy established by AB 32, which is to return to the state's GHG emissions inventory to 1990 levels by year 2020. In September 2016, SB 32 was signed into law, requiring the state's GHG emissions to return to 40 percent below 1990 levels by 2030. Executive Order B-30-15 and SB 32 require CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. In November 2017, CARB adopted the 2017 Climate Change Scoping Plan to address the new interim GHG emissions target under Senate Bill 32.

The FFTOD Specific Plan and its objectives would directly support the goals of AB 32 and SB 32. For example, the State's 2017 Scoping Plan update includes VMT reduction goals that call for promotion of land use and community design that reduce VMT, transit-oriented development, and complete street design policies that prioritize transit, biking, and walking. As discussed in Section 3.14, Transportation, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline.

In addition, the FFTOD Specific Plan would comply with the most current Building Energy Efficiency Standards and CALGreen requirements. The CALGreen requirements include mandatory measures for all new building construction, which would result in energy conservation, and make a major contribution in meeting the State's goals established by AB 32 and SB 32 for reduction in GHG emissions. Further, future buildings constructed over the lifetime of the project would be subject to the future triannual updates to the Building and Energy Efficiency Standards, which will ultimately require zero net energy construction. Therefore, implementation of the FFTOD Specific Plan would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

### 3.6.4.2 Connect SoCal, the SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The FFTOD Specific Plan would be consistent with SCAG's regional goals of providing infill housing, improving the jobs-housing balance, and integrating land uses near major transportation corridors. Building upon the recommendations of the RTP/SCS, the intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMTs, and streamline the environmental review of future development projects. The FFTOD Specific Plan

includes Guiding Principles and Concepts for each station and that serve as criteria for decision making. The proposed zones in the FFTOD Specific Plan Area along with the proposed Guiding Principles and Concepts are consistent with Los Angeles County policies and are provided to ensure land use designation compatibility and minimization of potential environmental impacts as build-out of the FFTOD Specific Plan occurs. The Guiding Principles for the community-wide transit oriented development and development concepts for each station are as follows:

## Guiding Principles

Guiding Principle 1: Promote pedestrian-friendly, active transit-oriented districts and corridors that support land uses that provide a variety of local services, employment, and housing.

Guiding Principle 2: Increase housing supply near transit that includes a variety of options for residents and families at different income levels.

Guiding Principle 3: Support a green community through enhanced streetscapes, a variety of publicly accessible open spaces, landscaping, and sustainability.

Guiding Principle 4: Encourage placemaking that embraces the vibrant culture of the community.

Guiding Principle 5: Support local jobs and opportunities through a variety of employment-generating uses.

Guiding Principle 6: Improve safety, connectivity, access, and ease of use for all modes of transportation.

Guiding Principle 7: Collaborate to promote equitable outcomes and inclusive economic development.

Guiding Principle 8: Collaborate with other local and regional entities to implement plan objectives efficiently and comprehensively.

## Community-Wide Transit Oriented Development Concepts

- Focus mixed use zoning (mix of services and homes) around Metro stations to activate those areas
- Support the Metro Rail-to-River corridor and future West Santa Ana Branch light rail extension through Slauson Station improvements
- Enhance and expand the public realm through setbacks that expand the sidewalk, pedestrian crossing upgrades, and bicycle facility upgrades
- Blend new development with existing neighborhoods through massing and setback requirements
- Combine improvements in sidewalks, bicycle facilities, and setback conditions to create active transit corridors that make accessing stations easier

### Slauson Station Concept

- Focus the highest densities, to enable more homes, businesses, and services, in walking distance of the Slauson Station
- Enhance pedestrian access with wayfinding and improved street crossings
- Formalize the pathway to the station from 60th Street
- Extend mixed use corridors to Compton Avenue and Homes Avenue to create a connected transit oriented development area around the station

### Florence Station Concept

- Reinforce and enhance the "Florence Mile" as an active mixed-use corridor and central destination for the community
- Blend new homes and services with the neighborhood context
- Improve station access with a new pedestrian bridge and upgraded street crossing
- Scale infill development for a variety of housing options to support family-oriented neighborhoods

### Firestone Station Concept

- Preserve the character and stability of the residential neighborhoods
- Maintain existing neighborhood density while increasing opportunities for accessory dwelling units and duplex housing options
- Allow neighborhood-scaled mixed use along the Firestone and Compton corridors
- Improve pedestrian station access through upgrading of the rail undercrossing

Mobility is an important component of sustainability and integrated planning in Connect SoCal. The FFTOD Specific Plan would be consistent with the policy framework and goals of Connect SoCal. The overall goals of Connect SoCal are to:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase people and goods movement and travel choices in the transportation system
5. Reduce GHG emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce vehicles miles traveled by cars, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. The

socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan Area include higher densities and more growth than is assumed in Connect SoCal (but is consistent with its goals for focusing higher-density development in transit-rich areas). As such, the FFTOD Specific Plan would be consistent with and would not conflict with SCAG's regional planning goals and policies.

In addition, the FFTOD Specific Plan includes strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The recommended mobility infrastructure improvements identified support transit, pedestrian, and bicycle mobility, and improve parking conditions. Examples of these strategies include:

- Transit stop amenities improve the transit experience (e.g., shelters, benches, lighting, transit information, trash bins, bicycle racks, and public art)
- Installation of new signage and wayfinding
- Traffic calming measures such as curb extensions, speed bumps, raised crosswalks, traffic circles, and roundabouts help slow the speed of traffic, improve the pedestrian environment, and minimize safety concerns associated with cut-through traffic
- Adding Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street

As identified in Section 3.14, Transportation, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. As such, the FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population, which is consistent with regional goals to reduce passenger VMT. Therefore, the FFTOD Specific Plan would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS. No impact would occur and no programmatic mitigation measures are required.

### Los Angeles County CCAP

Los Angeles County adopted a CCAP on October 6, 2015. The CCAP identifies and evaluates feasible and effective policies to reduce GHG emissions in order to reduce energy costs, protect air quality, and improve the economy and the environment. Although the policies identified in the CCAP represent Los Angeles County's actions to achieve the GHG reduction targets of AB 32 for target year 2020 and is now being updated in a new CCAP, continued implementation of Los Angeles County's existing actions would continue to reduce GHG emissions in the future. A consistency analysis with the FFTOD Specific Plan to the applicable measures in the CCAP is provided in Table 3.6-7, Consistency with the Unincorporated Los Angeles County CCAP. As identified in the table, the FFTOD Specific Plan would be consistent with the measures in the CCAP. Therefore, the FFTOD Specific Plan would not conflict with the CCAP and impacts are considered less than significant.

**Table 3.6-7: Consistency with the Unincorporated Los Angeles County Community Climate Action Plan**

| # | Applicable Measure | Consistency |
|---|---|---|
| BE-1 | Green Building Development. Promote and incentivize at least Tier 1 voluntary standards within CALGreen for all new residential and nonresidential buildings. Develop a heat island reduction plan and facilitate green building development by removing regulatory and procedural barriers. | Consistent: The 2016 Building and Energy Efficiency Standards would be applicable to the FFTOD Specific Plan. Pursuant to the Los Angeles County's Green Building Ordinance, nonresidential buildings over 25,000 square feet and residential buildings seven stories high and taller would be required to achieve the Tier 1 energy standards. New buildings would replace existing structures that were constructed prior to adoption of the California Building and Energy Efficiency Code; these newer facilities would achieve the latest Building and Energy Efficiency Standards (Title 24, Parts 6 and 11. |
| BE-3 | Solar Installations. Promote and incentivize solar installations for new and existing homes, commercial buildings, carports and parking areas, water heaters, and warehouses. | Consistent: The current Building and Energy Efficiency Standards do not mandate that new homes have solar panels. However, they require that new buildings be constructed to accommodate the rooftop load and wiring necessary to support solar panels. In accordance with Executive Order B-30-15, approximately 50 percent of total energy demand in the state would be through renewable resources in order to achieve the 50 percent RPS goal by 2030. |
| LUT-1 | Bicycle Programs and Supporting Facilities. Construct and improve bicycle infrastructure to increase biking and bicyclist access to transit and transit stations/hubs. Increase bicycle parking and "end-of-trip" facilities offered through the unincorporated County | Consistent: The FFTOD Specific Plan provides appropriate accommodations for pedestrian and bicycle facilities by developing sidewalk and intersection improvements and bicycle routes, including adding Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street, and implementing complete street strategies with traffic calming measures. The FFTOD Specific Plan includes various accommodations to improve pedestrian and bicycle facilities and comply with the Los Angeles County 2012 Bicycle Master Plan. |
| LUT-2 | Pedestrian Network. Construct and improve pedestrian infrastructure to increase walking and pedestrian access to transit and transit stations/hubs. Program the construction of pedestrian projects toward the goal of completing 15,000 linear feet of new pedestrian improvements/amenities per year. | Consistent: The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment of the FFTOD Specific Plan Area to generate a mixed use community, where employment, housing, retail, and multi-modal mobility uses are developed in proximity to one another and to the existing Slauson, Florence, and Firestone stations. Consistent with this policy, the project would incorporate pedestrian-oriented circulation infrastructure (such as sidewalks and crossings), landscaping, wayfinding signage, street lighting, and street amenities along pedestrian and bicycle routes. Specifically, three major improvements have been identified to improve access to the Metro A Line Stations in the FFTOD Specific Plan Area (and to Roosevelt Park), with a focus on pedestrian accessibility:<br>• Southern Slauson Station Access Point. Formalizing the informal pedestrian pathway leading from 60th Street to Slauson Avenue will connect the neighborhoods south of the Slauson Station to the station entrance. This pathway is already used as an informal access point to the station and provides a more direct path of travel to the station entrance.<br>• Pedestrian Bridge at 76th Street. Replacement and reconstruction of the pedestrian bridge connecting the west side of the community at East 76th Street to Roosevelt Park at Graham Avenue would improve neighborhood pedestrian connectivity, access to community assets, and access to transit.<br>• Florence Station and Firestone Station Access. At the Florence Station, the community suggested creation of a |

| # | Applicable Measure | Consistency |
|---|---|---|
| | | second at-grade access point at the south end of the station to minimize out-of-direction travel to access the platform. At the Firestone Station, additional amenities under the elevated rail line would improve the pedestrian and transit rider experience. |
| LUT-3 | Transit Expansion. Collaborate with the Los Angeles County Metropolitan Transportation Authority (Metro) on a transit program that prioritizes transit by creating bus priority lanes, improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs. | Consistent: The FFTOD Specific Plan recognizes that station access is a key element in successful transit oriented design station area planning and has identified strategies that focuses on improving accessibility during the first and last miles of a transit rider's journey. These strategies include streetscape improvements, bicycle and pedestrian infrastructure improvements, and signage and wayfinding improvements. |
| LUT-4 | Travel Demand Management. Encourage ride- and bike- sharing programs and employer sponsored vanpools and shuttles. Encourage market-based bike sharing programs that support bicycle use around and between transit stations/hubs. Implement marketing strategies to publicize these programs and reduce commute trips. | Consistent: Refer to responses to LUT-1 through LUT-3, above. The FFTOD Specific Plan includes sufficient parking to ensure the economic viability and success of the community, to provide parking in convenient locations to users, and to efficiently manage parking in a manner that supports a walkable and pedestrian-friendly environment. Considering the unique context of the Florence-Firestone community, which includes an older housing stock that may have fewer parking spaces per unit, a higher number of people per unit than Los Angeles County average, and concerns about rising cost of living that may induce displacement in the community, the FFTOD Specific Plan recommends a comprehensive parking study as the most immediate implementation action. Some initial ideas that will be explored further in the comprehensive parking study include in-lieu parking fees for projects having difficulty meeting parking requirements, flexible parking standards to set upper and lower limits, Los Angeles County-managed off-street parking structures and lots, on-street flex zones, EV carshare parking, and parking sensor technology. The implementation of these design strategies would facilitate transit use and reduce automobile dependence while addressing the needs of the Florence-Firestone community. |
| LUT-5 | Car Sharing Program. Implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles | Consistent: This measure is not directly applicable to the FFTOD Specific Plan. However, car-sharing services are available to residents, employees, and visitors in the FFTOD Specific Plan area (e.g., ZipCar), as are service-based vehicle programs (e.g., Uber, Lyft) The FFTOD Specific Plan would not conflict with this GHG reduction measure. |
| LUT-6 | Land Use Design and Density. Promote sustainability in land use design, including diversity of urban and suburban developments. | Consistent: The FFTOD Specific Plan introduces mixed-use and higher density residential development within the FFTOD Specific Plan Area to encourage more pedestrian, bicycle, and transit activity. The FFTOD Specific Plan would accommodate mixed-use and higher density adjacent to Metro A Line Stations to lay the foundation for a more livable and sustainable community. |
| LUT-7 | Transportation Signalization Program. Improve the network of traffic signals on the major streets throughout Los Angeles County. | Consistent: This measure is not directly applicable to the FFTOD Specific Plan. Los Angeles County maintains a TSSP to improve the network of traffic signals. The typical TSSP project involves upgrading all the traffic signals along a route to keep the signals synchronized, placing vehicle detectors in the pavement, coordinating the timing of the signals between successive intersections, and automatically adjusting the traffic signals to facilitate the movement of vehicles through the intersections. The FFTOD Specific Plan would not conflict with this measure. |

| # | Applicable Measure | Consistency |
|---|---|---|
| LUT-8 | Electric Vehicle Infrastructure. Install 500 EV charging facilities at County owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) and ensure that at least one-third of these charging stations will be available for visitor use. | Consistent: This measure is not directly applicable to the FFTOD Specific Plan as it pertains to Los Angeles County-owned facilities. However, CALGreen now requires installation of electric vehicle charging spaces in nonresidential development based on the total number of spaces (2016 CALGreen Table 5.106.5.3.3). With an increase in nonresidential uses, the FFTOD Specific Plan would result in an increase in electric vehicle charging stations within the FFTOD Specific Plan Area. |
| LUT-9 | Idling Reduction Goal. Encourage idling limits of 3 minutes for heavy-duty construction equipment, as feasible within manufacturer's specifications. | Consistent: The current idling limit adopted by CARB and local air district regulations is 5 minutes. Compliance with CARB airborne toxic control measures that reduce diesel emissions and Programmatic Mitigation Measure AQ-1 would also reduce construction vehicle exhaust associated with the project to the extent feasible |
| LUT-11 | Sustainable Pavements Program. Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation. | Consistent: This measure is not directly applicable to the FFTOD Specific Plan. However, pavement maintenance and rehabilitation within the FFTOD Specific Plan Area would be conducted in accordance with the latest Los Angeles County policies and procedures. The Los Angeles County Public Works applies a 3-pronged sustainable approach in the rehabilitation, construction, and maintenance of its road network. This approach incorporates principles that (1) focus on taking care of roads that are in good condition first; (2) use recycled materials from recycled tires or aggregates from existing pavement in the treatment selections; and (3) reuse the existing materials in place by recycling the pavement or adding cement to the subgrade beneath the pavement to improve its strength. The FFTOD Specific Plan would not conflict with this measure. |
| LUT-12 | Electrify Construction and Landscaping Equipment. Use electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment. | Consistent: Pursuant to the California Building Code (Title 24), buildings are now required to include electrical outlets on the exterior of buildings to support the use of electric landscaping equipment. |
| WAW-1 | Per Capita Water Use Reduction Goal. Meet the State established per capita water use reduction goal, as identified by SB X7-7 for 2020. | Consistent: The nonresidential buildings that are 25,000 square feet and larger and residential buildings seven stories or higher would comply with Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet, which requires implementation of the Tier°1 voluntary standards (30 percent reduction) for indoor potable water use and 60 percent of reference evapotranspiration (ETo) for outdoor potable water use; Section 5.106.4, Low Impact Development; and Section 4.106.5, Landscape Design, which requires use of noninvasive drought-tolerant plants, which would reduce per capita urban water use. |
| WAW-2 | Recycled Water Use, Water Supply Improvement Programs, and Stormwater Runoff. Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes. Manage stormwater, reduce potential treatment, and protect local groundwater supplies. | Consistent: The FFTOD Specific Plan would not introduce new sources of agriculture or industrial manufacturing. Water used for landscape irrigation would be minimized through implementation of Los Angeles County's Water Efficient Landscape Ordinance. |

| # | Applicable Measure | Consistency |
|---|---|---|
| SW-1 | Waste Diversion Goal. For the County's unincorporated areas, adopt a waste diversion goal to comply with all state mandates associated with diverting from landfill disposal at least 75% of the waste by 2020. | Consistent: In accordance with Los Angeles County's Construction & Demolition (C&D) Debris Recycling and Reuse Ordinance, Chapter 20.87 of the Los Angeles County Code, development within the FFTOD Specific Plan Area would be required to divert a minimum of 65 percent of the C&D debris by weight and submit a Recycling and Reuse Plan to Los Angeles County's Construction & Demolition Unit for review and approval. Additionally, according to the County's Green Building Ordinance, which requires implementation of CALGreen Tier°1 voluntary standards, the proposed project building materials will include a minimum of 10 percent of recycled content based on estimated cost. |
| LC-1 | Develop Urban Forests. Support and expand urban forest programs within the unincorporated areas | Consistent. The FFTOD Specific Plan encourages installation of street trees, especially along pathway arterials. All street trees are required to be planted in accordance with established Los Angeles County planting standards. Street tree standards are identified in the design guidelines for streetscape design. |

Notes:
CARB = California Air Resources Board
EV = electric vehicle
RPS = renewables portfolio standard
TSSP = traffic signal signalization program
Measure BE-2 is a program for existing development and is not applicable to the project. Measure BE-4 is a County-wide program that promotes alternative renewable energies and is not applicable to the project. Measures BE-5 and BE-6 are a County-wide program to encourage use of biogas and energy efficiency retrofits at wastewater treatment facilities and is not applicable to the project. Measure LUT-10 is a County-wide program for goods movement and it not applicable to the project. Measures LC-2, LC-3, and LC-4 are not applicable to the project because they are County-wide programs that focus on creating and protecting open space areas and promoting the sale of locally grown produce.
Source: Los Angeles County 2015.

## 3.6.5 Programmatic Mitigation Measures

The following programmatic mitigation measure in Section 3.2, Air Quality, applies here and would reduce project-related GHG emissions impacts.

**MM-AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

## 3.6.6 Level of Significance After Mitigation

### Impact GHG-1

Compliance with the applicable building and transportation energy and efficiency standards and codes, water efficiency standards, and construction demolition and debris recycling and reuse standards would reduce emissions associated with transportation, energy, and water use within the FFTOD Specific Plan Area. In addition, implementation of Programmatic Mitigation Measure AQ-7, which would ban fireplaces in new residential development would also reduce GHG emissions. The estimated emissions with implementation of Programmatic Mitigation Measure AQ-7 and building energy and efficiency standards (e.g., 2019 Building Energy Efficiency Standards [Title 24]) are provided in Table 3.6-8.

**Table 3.6-8: FFTOD Specific Plan Mitigated Net New GHG Emissions**

| Source/Category | GHG Emissions (MT $CO_2e$) |
|---|---|
| Amortized Construction | 865 |
| Area | 209 |
| Energy | 18,076 |
| Mobile | 55,278 |
| Waste | 3,726 |
| Water | 4,420 |
| **Total Net New GHG Emissions** | 82,574 |
| **Net Emissions Per Service Population (MT $CO_2e$/SP)[1]** | **2.20** |
| 2035 Efficiency Threshold (MT $CO_2e$/SP) | 2.36 |
| **Exceeds Threshold?** | No |

Notes:
Estimated by AECOM in 2021. Additional details provided in Appendix B. Totals may not add due to rounding.
[1]Net emissions per service population calculated by dividing the net new emissions associated with buildout of the FFTOD Specific Plan by the number of employees and residents within the Specific Plan. The net new service population associated with the net new development under the FFTOD Specific Plan is approximately 37,441.
MT $CO_2e$ = metric tons of carbon dioxide equivalent; SP = service population; GHG = greenhouse gas

The buildout of the FFTOD Specific Plan would generate 2.20 MT$CO_2e$ per SP and would not exceed the efficiency target of 2.36 MT$CO_2e$ per SP (Table 3.6-7). Therefore, with implementation of Programmatic Mitigation Measures AQ-7, GHG emissions associated with construction and operation of the FFTOD Specific Plan would be less than cumulatively considerable.

## 3.6.7 Cumulative Impacts

The geographic scope of consideration for GHG emissions is on a global scale, because such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By their nature, GHG evaluations under CEQA are a cumulative study. (See *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204). The GHG emissions impact analysis above constitutes a cumulative analysis, in that it considers global, statewide, and regional projections of GHG emissions, as well as the contribution of the project, to GHG emission impacts. Therefore, the significance conclusions reached above with regard to Impacts GHG-1 and GHG-2 also constitute this Environmental Impact Report's significance conclusions with regard to cumulative GHG emissions impacts. This impact would be less than cumulatively considerable.

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# 3.7 HAZARDS AND HAZARDOUS MATERIALS

This section provides an evaluation of the anticipated hazards and hazardous materials impacts from implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan). This analysis identifies existing hazards and hazardous materials within the FFTOD Specific Plan Area and surrounding vicinity, as well as hazards and hazardous materials resulting from construction and operation of the project.

### Hazardous Materials Definition

The term "hazardous materials" refers to both hazardous substances and hazardous wastes. Under federal and state laws, materials—including wastes—may be considered hazardous if they are specifically listed by statute as such or if they exhibit one of the four characteristics: are poisonous (toxicity);can be ignited by open flame (ignitability); can corrode other materials (corrosivity); or can react violently, explode or generate vapors when mixed with water (reactivity). The term "hazardous material" is defined in law as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment (California Health and Safety Code [HSC], Section 25501[o]). In some cases, past industrial or commercial activities could have resulted in spills or leaks of hazardous materials, resulting in soil and/or groundwater contamination. The presence of certain hazardous materials can also lead to the buildup of methane gas that can become an explosive hazard if trapped under structures. Hazardous materials may also be present in building materials and released during building demolition activities.

Federal and state laws require that hazardous materials be specially managed. Excavated soils having concentrations of contaminants such as lead, gasoline, or industrial solvents that are higher than certain acceptable levels must be managed, treated, transported, and/or disposed of as a hazardous waste. The California Code of Regulations (CCR), Title 22, Section 66261.20 through 66261.24, contains technical descriptions of characteristics that would cause a soil to be designated a hazardous waste. California regulations are compliant with federal regulations and are more stringent in most cases. Regulations also govern the management of potentially hazardous building materials such as asbestos, lead-based paint, and polychlorinated biphenyls (PCBs) during demolition activities that could potentially disturb existing building materials.

## 3.7.1 Environmental Setting

The FFTOD Specific Plan Area is predominantly residential but industrial uses are the second most common land use. Industrial areas of Florence-Firestone are primarily clustered along Slauson Avenue, Wilmington Avenue, and Alameda Street, as well as along the LA Metro A Line and railroad rights-of-way along Graham, Beach, and Maie avenues. Existing industrial uses generally consist of outside storage, warehouses, auto-related uses, recycling, and limited manufacturing. Auto-related and outdoor storage uses are the most prevalent industrial uses in the FFTOD Specific Plan Area. The more intensive uses (e.g., materials recycling and auto-dismantling) are clustered along Alameda Street (also known as the Alameda Corridor), which is the largest industrial area in the FFTOD Specific Plan Area and one of the largest in Los Angeles County (DRP 2019b). Residential uses are in proximity to industrial uses because the residential areas historically provided worker housing for the local industries, as further described below.

### 3.7.1.1 Historical Land Uses

The land that now comprises the FFTOD Specific Plan Area was historically used for farmland, with farms ranging in size from 40 to several hundred acres. In 1869, a rail line paralleling Alameda Street from Los Angeles to Wilmington was completed by the Southern Pacific Railroad. In 1876, the transcontinental rail line was completed, connecting the Florence-Firestone area to the nationwide rail system. Southern Pacific and Pacific Electric railroads had stops along Florence Avenue and Graham Avenue. With the construction of the Pacific Electric inter-urban line red cars, which ran from Los Angeles to Long Beach along Graham Avenue, the Florence-Firestone area had additional regional rail connections by 1902. Development initially occurred around the rail and streetcar lines. The 1960 U.S. Census indicated that 72 percent of all housing in the community was constructed before 1940. Many of the structures built between the 1920s and 1940s remain today (DRP 2019a).

The rail line and proximity to ocean ports made Florence-Firestone and its surrounding areas an ideal location for factories, with abundant manufacturing jobs in the early 1920s. Tire and rubber plants, steel manufacturers, automobile assembly plants, derrick and equipment companies, and other manufacturing companies provided a variety of good jobs for the community. The onset of World War II brought additional manufacturing jobs to the area with the growth of the defense industry. However, after World War II the defense industry declined, and manufacturers transitioned to the auto industry. In the 1960s, the community was affected by deindustrialization. Factories began to move to outlying areas where there was more space, cheaper land, and less of the perceived social ills of the urban core. Deindustrialization continued into the 1970s and 1980s, resulting in widespread unemployment in the area (DRP 2019a).

In 1990, the Los Angeles County Metropolitan Transportation Authority (LA Metro) opened the 22-mile LA Metro A Line, connecting Downtown Los Angeles and the city of Long Beach. The LA Metro A Line runs through the FFTOD Specific Plan Area, with three stops at Slauson, Florence, and Firestone (DRP 2019a).

### 3.7.1.2 Environmental Database Search

The EnviroStor database, which includes Cortese sites and is maintained by the California Department of Toxic Substances Control (DTSC), identifies sites that have known contamination or sites where there may be reasons to investigate further. The database includes federal Superfund sites, state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. It also includes sites that are being investigated for suspected but unconfirmed contamination. A search of this database found 87 active sites (or with action required) within the FFTOD Specific Plan Area. A list of the locations, types, and statuses of each site is provided in Table 3.7-1.

**Table 3.7-1: EnviroStor Sites in the FFTOD Specific Plan Area**

| EnviroStor ID | Site Name | Site Status | Site Type | Site Address |
|---|---|---|---|---|
| 80001478 | American Labs Inc | Active | Corrective Action | 5701 S Compton |
| 80001575 | Blue Coral In, Mckay Chemical Div | Active | Corrective Action | 1920 Randolph Street |

| EnviroStor ID | Site Name | Site Status | Site Type | Site Address |
|---|---|---|---|---|
| 80001406 | Clean Harbors Los Angeles LLC | Inactive - Needs Evaluation | Corrective Action | 5756 Alba Street |
| 60002326 | Avon Rubber Company | Refer: EPA | Evaluation | 2001 Belgrave Avenue |
| 19320198 | Bauhaus Group | Inactive - Action Required | Evaluation | 1316 East Slauson Avenue |
| 19281224 | Four Star Chemical | Inactive - Action Required | Evaluation | 5701 Compton Avenue |
| 60001734 | Gluall Wood Products | Refer: EPA | Evaluation | 5877 Compton Avenue |
| 60002327 | L & B Industries Inc. | Inactive - Action Required | Evaluation | 7412 Maie Avenue |
| 60002793 | Lee's Plating | Active | Evaluation | 6225 Wilmington Avenue |
| 60001121 | Martin Wells Inc | Inactive - Needs Evaluation | Evaluation | 5886 South Compton Avenue |
| 60002094 | Master Body Shop | Refer: EPA | Evaluation | 1322 East Slauson Avenue |
| 60002091 | Moreno Transmission Shop | Refer: EPA | Evaluation | 6021-6023 South Compton Avenue |
| 19340778 | Plating Shop | Inactive - Needs Evaluation | Evaluation | 5816 Hooper Avenue |
| 60002336 | Sanders Services | Refer: EPA | Evaluation | 5921 Wilmington Avenue |
| 60002332 | Waymire Drum Company Inc | Inactive - Action Required | Evaluation | 7702 Maie Avenue |
| CAD982465841 | Advanced Technology Incineration | Protective Filer | Nonoperating | 5756 Alba Street #A |
| CAD981459175 | American Labs Inc | Undergoing Closure | Nonoperating | 5701 S Compton |
| CAD008381360 | Former Blue Coral Facility | Undergoing Closure | Nonoperating | 1920 Randolph Street |
| CAD009522988 | Talley Brothers Inc Site | Undergoing Closure | Nonoperating | 2007 Laura Avenue |
| CAT000618991 | Waymire Drum Co Inc | Protective Filer | Nonoperating | 7702 Maie Avenue |
| CAD050806850 | Emerald Transformer Los Angeles, LLC | Operating Permit | Operating | 5756 Alba Street |
| 60002166 | Service Plating Company Inc | Active | State Response | 1855 East 62nd Street |
| 19290138 | Talley Brothers Inc | Active | State Response | 2007 Laura Avenue |
| 71002923 | West Coast Metal Finishing Co. | Refer: Other Agency | Tiered Permit | 5742 Bandera Street |
| 60000434 | Former Southland Steel Facility | Active | Voluntary Cleanup | 5959, 5969, 6011, 6161, and 6169 South Alameda Street |
| 80001660 | Lonza Inc | Inactive - Needs Evaluation | Corrective Action | 2031 E 65th Street |
| 80001421 | Marvin Electric MFG Co Inc | Active | Corrective Action | 6100 S Wilmington Avenue |
| 80001485 | Master Wash Products Inc | Inactive - Needs Evaluation | Corrective Action | 8122 Alameda Street |
| 19340787 | Advanced Aluminium & Brass Sales | Inactive - Action Required | Evaluation | 1001 E. Slauson Avenue |
| 19750098 | American Bumper Sales | Inactive - Action Required | Evaluation | 1150 East Slauson Avenue |

| EnviroStor ID | Site Name | Site Status | Site Type | Site Address |
|---|---|---|---|---|
| 60001122 | American Superior Vintage | Inactive - Action Required | Evaluation | 1001 East 62nd Street |
| 19281221 | Atomic Rags #1 | Inactive - Needs Evaluation | Evaluation | 859 East 60th Street |
| 19281220 | Atomic Rags #2 | Inactive - Needs Evaluation | Evaluation | 909 East 60th Street |
| 19281219 | Atomic Rags #3 | Inactive - Needs Evaluation | Evaluation | 851 East 60th Street |
| 19550028 | Bike Shop | Inactive - Action Required | Evaluation | 5201 South Compton Avenue |
| 60002410 | California Aerodynamics | Refer: EPA | Evaluation | 911 East 59th Street |
| 60002829 | Chinchilas Tire Services | Inactive - Needs Evaluation | Evaluation | 5870 Hooper Avenue |
| 60002329 | Damille Metal SVC | Refer: EPA | Evaluation | 8201 Santa Fe Avenue |
| 19760023 | Dependable Refrigeration | Inactive - Action Required | Evaluation | 5201 South Central Avenue |
| 60001728 | Easy Sewing Co. | Refer: Other Agency | Evaluation | 5716 Mckinley Avenue |
| 19281222 | Fox Trading | Inactive - Needs Evaluation | Evaluation | 901 East 61st Street |
| 60001741 | H.C. Lien Rubber Company | Refer: EPA | Evaluation | 1201/1171 East 63rd Street |
| 60001744 | Hall's Store Fixtures | Refer: EPA | Evaluation | 5890 South Central Avenue |
| 60001739 | I & J Body and Paint Transmission Inc. | Refer: EPA | Evaluation | 6221 Hooper Avenue |
| 60001715 | J C Holderness | Refer: EPA | Evaluation | 5732 South Central Avenue |
| 60001716 | Julies Trading Co. | Refer: EPA | Evaluation | 931 East 61st Street |
| 19340789 | K. J. Welding & Iron Works | Inactive - Action Required | Evaluation | 1202 East Slauson Avenue |
| 19390062 | L.A. Crank & Engine Rebuild | Inactive - Action Required | Evaluation | 5728 S. Cenral Avenue |
| 60002093 | LA Parkerizing Company | Inactive - Needs Evaluation | Evaluation | 8205 South Alameda Street |
| 60001788 | Madison Industries | Inactive - Needs Evaluation | Evaluation | 1900 E. 64th Street |
| 60002411 | Maran Wurzell Glass and Mirror | Refer: EPA | Evaluation | 2300 East Slauson Avenue |
| 60002092 | Modine Western Inc. | Refer: EPA | Evaluation | 6309 South Central Avenue |
| 60000390 | Proposed South Region High School #13, Site 3 | Inactive - Needs Evaluation | Evaluation | East 85th Street and South Alameda Street |
| 60001683 | Puckett Lucille M. TR. | Refer: EPA | Evaluation | 1206 Slauson Avenue |
| 60001687 | Ramirez Property | Refer: EPA | Evaluation | 1420 East 62nd Street |
| 60001686 | Recycling Center (Basic Fibers) | Refer: Other Agency | Evaluation | 6355 Compton Avenue |
| 60002331 | Salsbury Industries | Refer: EPA | Evaluation | 1010 E 62nd Street |

| EnviroStor ID | Site Name | Site Status | Site Type | Site Address |
|---|---|---|---|---|
| 60002232 | Slauson/Gage Corridor Discovery Project | Refer: EPA | Evaluation | Slauson Avenue Gage Avenue |
| 60001681 | Sun Supply Co. | Refer: EPA | Evaluation | 918 E. 60th Street |
| 60002337 | Western Fabricators | Refer: EPA | Evaluation | 2055 Randolph Street |
| 60000312 | Williams Recycling | Inactive - Action Required | Evaluation | 2225 E 92nd Street |
| CAL000099147 | American Labs & Recovery Inc | Nonoperating | Nonoperating | 1116 E 58th Street |
| CAD070635669 | Lonza Inc | Protective Filer | Nonoperating | 2031 E 65th Street |
| 19880016 | Jefferson New Elementary School No. 7 | Certified | School Cleanup | Wadworth Avenue/52nd Place |
| 60000808 | South Region Elementary School #12, Site 5A | Certified | School Cleanup | East 60th Street/Hooper Avenue/East 61st Street |
| 60000092 | South Region ES #2, Site 6a 5640015 | Certified | School Cleanup | S. Central/East Florence |
| 60000114 | South Region High School #7 (Site 11a) | Certified / Operation & Maintenance | School Cleanup | Northeast of South Alameda Street And Gage Avenue |
| 60000076 | South Region HS #2, Site #8 | Certified O&M - Land Use Restrictions Only | School Cleanup | Central Avenue/Gage Avenue |
| 60000870 | South Region Middle School #3 Site 12F | Certified | School Cleanup | Santa Fe Ave/Walnut Terrace/Mabrisa Avenue |
| 60000266 | South Region Middle School #3, Site 1 | Inactive - Action Required | School Investigation | Leota Street/Nadeau Avenue |
| 19370360 | ESKIMO RADIATOR | Certified | State Response | 6135 South Central Avenue |
| 70000165 | Firestone - Engle Southern Parcel | Active | State Response | 8440 Alameda Street |
| 19300231 | Firestone - Parcel 1a | Active | State Response | 2323 Firestone Blvd |
| 70000167 | Firestone - Parcel 3N | Certified | State Response | 8809 Calden Avenue, South Gate |
| 70000168 | Former Firestone - Parcel 3S | Certified O&M - Land Use Restrictions Only | State Response | 2405 Southern Avenue, South Gate |
| 70000049 | Navarro Property | Certified | State Response | 1250-1256 East 57th Street |
| 71003351 | Alloys Cleaning, Inc. | Refer: Other Agency | Tiered Permit | 1945 E 64th Street |
| 71003824 | Graybill Metal Plating & Polishing | Inactive - Action Required | Tiered Permit | 1245 E Florence Avenue |
| 71002387 | Punch Press Products, Inc./All Bright Pltg | Refer: Other Agency | Tiered Permit | 1916 E. 51st Street |
| 19330384 | Alloy Metals Inc. | Inactive - Action Required | Voluntary Cleanup | 1000 E. 60th Street |
| 60000644 | Engle Northern Parcel | Active | Voluntary Cleanup | 8440 South Alameda Street |
| 60002984 | Jordan Downs Village | Active | Voluntary Cleanup | 9800 Grape Street |

| EnviroStor ID | Site Name | Site Status | Site Type | Site Address |
|---|---|---|---|---|
| 70000166 | Los Angeles Community College District | Active | Voluntary Cleanup | 2525 East Firestone Boulevard |
| 19380056 | Sargent Industries | Active | Voluntary Cleanup | 2501-2533 East 56th Street |
| 19300240 | Slauson-Central Shopping Center Redevelopment Project | Certified O&M - Land Use Restrictions Only | Voluntary Cleanup | Slauson, S. Central, E. Gage, Avalon |
| 60000767 | South Gate Townhomes Project | Certified / O&M | Voluntary Cleanup | 8901 Calden Avenue |
| 19340754 | United Alloys, Inc. | Active | Voluntary Cleanup | 900 East Slauson Avenue |

Notes:
For a glossary of terms with definitions of the various site types and other terms related to the EnviroStor Database refer to DTSC's Glossary of Terms at www.envirostor.dtsc.ca.gov
Note: This table does not include sites with site status of 'inactive – withdrawn', 'closed', 'no further action', or 'no action required'.
EPA = U.S. Environmental Protection Agency
O&M = Operation & Maintenance
Source: DTSC 2021.

The GeoTracker database, maintained by the State Water Resources Control Board (SWRCB), lists a range of types of hazardous materials sites that could affect groundwater quality, including leaking underground storage tank (LUST) sites, cleanup program sites, land disposal sites, and military sites. A search of this database found 15 sites within the FFTOD Specific Plan Area. Sites listed in both the GeoTracker and EnviroStor databases include Lonza, Inc., at 2031 East 65th Street; Service Plating Company, Inc., at 1855 East 62nd Street; United Alloys, Inc., at 900 East Slauson Avenue; and Waymire Drum Company, Inc., at 7702 South Maie Avenue. A list of the locations, types, and statuses of each site is provided in Table 3.7-2.

**Table 3.7-2: GeoTracker Sites in the FFTOD Specific Plan Area**

| Geotracker ID | Site Name | Site Type | Site Status | Site Address |
|---|---|---|---|---|
| T0603702754 | Service Plating Company Inc | Cleanup Program Site | Open - Inactive | 1855 E 62nd Street |
| SL0603783051 | Exxon/Mobil Pipeline Co. Line M-8 | Cleanup Program Site | Open - Site Assessment | South Alameda Street and Florence Avenue |
| T10000016518 | Former Mobil Station #99laf | LUST Cleanup Site | Open - Inactive | 1347 Florence Avenue W |
| SL092516 | Pacific Pipeline 2000 | Cleanup Program Site | Open - Site Assessment | South Alameda Street and Florence Avenue |
| SL204AC1742 | Waymire Drum Co | Cleanup Program Site | Open - Site Assessment | 7702 South Maie Avenue |
| T10000016056 | Auto Repair Facility | LUST Cleanup Site | Open - Eligible For Closure | 2111 Firestone Boulevard |
| SLT43647645 | Essef - Main Parcel | Cleanup Program Site | Open - Remediation | 8825 Beach Street |
| SLT43645643 | Essef - Parcel A | Cleanup Program Site | Open - Remediation | 8906 Graham Avenue |

| Geotracker ID | Site Name | Site Type | Site Status | Site Address |
|---|---|---|---|---|
| SLT43646644 | Essef - Parcel B | Cleanup Program Site | Open - Site Assessment | 9000 Graham Avenue |
| SL204BX2363 | JFL Electric Co/United Chemical (Former) | Cleanup Program Site | Open - Site Assessment | 8251-8257 Compton Avenue |
| T0603700406 | LA City Dept Water & Power | LUST Cleanup Site | Open - Remediation | 8627 Fir Avenue |
| SL2042T1544 | Lonza Inc | Cleanup Program Site | Open - Inactive | 2031 East 65th Street |
| SL2049C1722 | United Alloys | Cleanup Program Site | Open - Site Assessment | 900 East Slauson Avenue |
| SL204BX2363 | JFL Electric Co/United Chemical (Former) | Cleanup Program Site | Open - Site Assessment | 8251-8257 Compton Avenue |
| SL2049A1721 | Jack Engle Co | Cleanup Program Site | Open - Inactive | 8440 South Alameda Street |

Notes:
LUST = leaking underground storage tank
Source: SWRCB 2021

### 3.7.1.3 Schools

Schools are one of the land use designations that are normally sensitive to hazardous materials. The FFTOD Specific Plan Area includes a total of nine elementary schools, five middle schools, three high schools, and two private schools. Students can attend schools in either Los Angeles Unified School District District 6 or District 7. A list of public, charter, and private schools in the FFTOD Specific Plan Area is provided in Table 3.7-3. All schools are under the jurisdiction of the Los Angeles Unified School District.

**Table 3.7-3: Schools in the FFTOD Specific Plan Area**

| Name and Address | Address |
|---|---|
| **Elementary Schools** | |
| Graham Elementary School | 8407 South Fir Avenue |
| Miramonte Elementary School | 1400 East 68th Street |
| Parmelee Avenue Elementary School | 1338 East 76th Street |
| Russell Elementary School | 1263 Firestone Boulevard |
| Florence Avenue Elementary School | 7211 Bell Avenue |
| Lillian Elementary School | 5909 Lillian Street |
| Dr. Lawrence H. Moore Math, Science, Technology Academy | 1321 East 61st Street |
| Judith F. Baca Arts Academy | 1536 E 89th Street |
| Wisdom Elementary | 1125 E 74th Street |
| **Middle Schools** | |
| Charles Drew Middle School | 8511 Compton Avenue |
| Thomas A. Edison Middle School | 6500 Hooper Avenue |
| Walnut Park Middle School | 7500 Marbrisa Avenue |
| Alliance Kory Hunter Middle School (Charter) | 5886 Compton Avenue |
| KIPP Philosophers Academy School (Charter) | 8300 South Central Avenue |

| Name and Address | Address |
|---|---|
| **High Schools** | |
| Diego Rivera Learning Complex | 6100 South Central Avenue |
| Alliance Margaret M. Bloomfield Technology Academy High School (Charter) | 7907 Santa Fe Avenue |
| Animo Pat Brown School (Charter) | 8255 Beach Street |
| **Private Schools** | |
| St. Malachy Catholic Elementary (Pre–K) | 1200 East 81st Street |
| St. Aloysius School (TK–8) | 2023 East Nadeau Street |

Source: CDE 2021

#### 3.7.1.4 Emergency Response Planning

The Los Angeles County Office of Emergency Management (OEM) maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazards Mitigation Plan. The Office of Emergency Management leads and coordinates disaster plans and disaster preparedness exercises for all cities and special districts in Los Angeles County (OEM 2002, 2014). Disaster Routes designated by the Los Angeles County Public Works are freeways, highways, or arterial routes identified for use during times of crisis. These routes bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property, and minimize impact to the environment (Los Angeles County Public Works 2012). During a disaster, these routes have priority over all other roads for clearing, repairing, and restoration. Florence Avenue and Alameda Street are designated Secondary Disaster Routes; they run east-west and north-south, respectively, through the FFTOD Specific Plan Area (Los Angeles County Public Works 2012).

### 3.7.2 Regulatory Setting

#### 3.7.2.1 Federal

##### Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act (29 Code of Federal Regulations [CFR] Parts 70 to 2400) is implemented by the Federal Occupational Safety and Health Administration (OSHA) and contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 CFR Section 1910 et seq., are designed to promote worker safety, worker training, and a worker's right-to-know. In California, OSHA has delegated the authority to administer OSHA regulations to the State of California.

##### Hazardous Materials Transportation Act of 1975

The Hazardous Materials Transportation Act (Title 49 U.S. Code [USC] Sections 5101–5127) is the principal federal law regulating the transportation of hazardous materials. Its purpose is to "protect against the risks to life, property, and the environment that are inherent in the transportation of hazardous material in intrastate, interstate, and foreign commerce" under the authority of the U.S. Secretary of Transportation. Regulations implementing the Hazardous Materials Transportation Act of 1975 specify additional requirements and regulations with respect to the transport of hazardous materials.

### Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 USC 2) was the first major federal act regulating the potential health and environmental problems associated with hazardous and nonhazardous solid waste. The RCRA and the implementation of regulations developed by the U.S. Environmental Protection Agency (EPA) provide the general framework for the national hazardous and nonhazardous waste management systems. This framework includes the determination of whether hazardous wastes are being generated, the techniques for tracking wastes to eventual disposal, and the design and permitting of hazardous waste management facilities. The RCRA amendments enacted in 1984 and 1986 began the process of eliminating land disposal as the principal hazardous waste disposal method. Hazardous waste regulations promulgated in 1991 address site selection, design, construction, operation, monitoring, corrective action, and closure of disposal facilities. Additional regulations addressing solid waste issues are contained in 40 CFR Part 258.

### Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA; 1980; 42 USC Section 1906 et seq.), also known as the Superfund Act, outlines the potential liability related to the cleanup of hazardous substances; available defenses to such liability; appropriate inquiry into site status under Superfund, which is the federal government's program to clean up the nation's uncontrolled hazardous waste sites; statutory definitions of hazardous substances and petroleum products; and the petroleum product exclusion under CERCLA. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also establishes the National Contingency Plan, which provides guidelines and procedures necessary to respond to releases and threatened releases of hazardous substances.

### Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 (42 USC 116, Sections 9601 et seq.), also known as the Superfund Amendment and Reauthorization Act (SARA) Title III, was created to help communities plan for emergencies involving hazardous substances. EPCRA requires hazardous chemical emergency planning by federal, state, and local governments; Native American tribes; and industry. It also requires industry to report on the storage, use, and releases of hazardous chemicals to federal, state, and local governments.

### Toxic Substances Control Act

The Toxic Substances Control Act of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The Toxic Substances Control Act addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon and lead-based paint.

### 3.7.2.2 State

#### Hazardous Waste Control Act

The Hazardous Waste Control Act (HSC Section 25100 et seq.) created the state hazardous waste management program, which is similar to but more stringent than the federal RCRA program. The act is implemented by regulations in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

#### Hazardous Materials Release Response Plans and Inventory Law of 1985

The Hazardous Materials Release Response Plans and Inventory Law of 1985 (HSC Division 20 Chapter 6.95 [25500–25547.8]) governs hazardous materials handling, reporting requirements, and local agency surveillance programs.

#### California Vehicle Code

The California Vehicle Code (Title 13 of the CCR) establishes regulations for motor carrier transport of hazardous materials. For example, all motor carrier transporters of hazardous materials are required to have a Hazardous Materials Transportation license issued by the California Highway Patrol. In addition, placards identifying that hazardous materials are being transported must be displayed on the vehicle.

#### California Health and Safety Code

##### *Section 25163*

The transport of hazardous waste materials is further governed by California HSC Section 25163 and Title 22, Chapter 13, of the CCR. Specifically, Section 25163 of the HSC requires transporters of hazardous waste to hold a valid registration issued by the DTSC in their possession while transporting hazardous waste. In addition, Title 22, Chapter 13, of the CCR outlines a number of requirements including—but not limited to—the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued
- To be registered as a hazardous waste transporter, an application must be submitted
- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter
- Hazardous waste shall be delivered to authorized facilities only

#### *Section 25249.5*

California HSC Section 25249.5 et seq., Safe Drinking Water and Toxics Enforcement Act, law identifies chemicals that cause cancer and reproductive toxicity, provides information for the public, and prevents discharge of the chemicals into sources of drinking water. Lists of the chemicals of concern are published and updated periodically. Businesses are required to notify Californians about the chemicals in products they purchase, in the workplace, or that are released to the environment. By being provided with this information, individuals are able to make informed decisions about protecting themselves from exposure to these chemicals.

#### *Section 25500*

California HSC Section 25500 et seq. and the related regulations in 19 CCR 2620, et seq., require local governments to regulate local business storage of hazardous materials in excess of certain quantities. The law also requires that entities storing hazardous materials be prepared to respond to releases. Those using and storing hazardous materials are required to submit a Hazardous Materials Business Plan to their local Certified Unified Program Agency (CUPA). They must also report releases to their CUPA and the State Office of Emergency Services (OES).

#### *Section 25531*

California HSC Section 25531 et seq. and the California Accidental Release Program outline the registration and handling of regulated substances. Regulated substances are any chemicals designated as an extremely hazardous substance by EPA as part of its implementation of SARA Title III. HSC Section 25531 overlaps or duplicates some of the requirements of SARA and the Clean Air Act. Facilities handling or storing regulated substances at or above threshold reportable quantities must register with their local CUPA and prepare a risk management plan.

### California Emergency Services Act

The California Emergency Services Act (Assembly Bill [AB] 38) gave the California Emergency Management Agency (CalEMA) responsibility for overseeing and coordinating emergency preparedness, response, recovery, and homeland security activities in the state. The governor's OES mission statement is to "Protect lives and property, build capabilities, and support our communities for a resilient California." OES goals include:

- **Goal 1:** Anticipate and enhance prevention and detection capabilities to protect our state from all hazards and threats.
- **Goal 2:** Strengthen California's ability to plan, prepare for, and provide resources to mitigate the impacts of disasters, emergencies, crimes, and terrorist events.
- **Goal 3:** Effectively respond to and recover from both human-caused and natural disasters.
- **Goal 4:** Enhance the administration and delivery of all state and federal funding and maintain fiscal and program integrity.
- **Goal 5:** Develop a united and innovative workforce that is trained, experienced, knowledgeable, and ready to adapt and respond.
- **Goal 6:** Strengthen capabilities in public safety communication services and technology enhancements.

### 2018 State Hazard Mitigation Plan

Approved by the Federal Emergency Management Agency (FEMA) on September 28, 2018, as an Enhanced State Mitigation Plan, the 2018 State Hazard Mitigation Plan update continues to build on California's commitment to reduce or eliminate the impacts of disasters caused by natural, technological, accidental, and adversarial/human-caused hazards; it further identifies and documents progress made in hazard mitigation efforts, new or revised state and federal statutes and regulations, and emerging hazard conditions and risks that affect the state of California. Resilience depends on the whole community and is a shared responsibility for all levels of government, private and nonprofit sectors, and individuals.

### Hazardous Materials Release Cleanup

Passed into law in 2013, the Hazardous Materials Release Cleanup (AB 440 Chapter 588) authorizes a local agency to take clean-up action (similar to under the Polanco Redevelopment Act) that the local agency determines is necessary and consistent with other state and federal laws to remedy or remove a release of hazardous substances within the boundaries of the local agency. AB 440 allows the local agency to designate another agency—in lieu of the department or the regional board—to review and approve a cleanup plan and to oversee the cleanup of hazardous material from a hazardous material release site under certain conditions. It also provides immunity to the local agency as long as the action is in accordance with a cleanup plan prepared by a qualified independent contractor; approved by the department, a regional board, or the designated agency; and the cleanup is undertaken and properly completed. Finally, AB 440 authorizes the local agency to recover cleanup costs from the responsible part.

### Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a CUPA. The Program Elements consolidated under the Unified Program are: Hazardous Waste Generator and On-Site Hazardous Waste Treatment Programs (i.e., Tiered Permitting); Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan; Hazardous Materials Release Response Plans and Inventory Program (i.e., Hazardous Materials Disclosure or "Community-Right-To-Know"); California Accidental Release Prevention Program (CalARP); underground storage tank (UST) Program; and Uniform Fire Code Plans and Inventory Requirements. The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency that implements one or more Program Elements in coordination with the CUPA. The Los Angeles County Fire Department (LACoFD) is the certified CUPA for the FFTOD Specific Plan Area as well as many cities throughout Los Angeles County.

### California Accidental Release Prevention Program

The main objective of the California Accidental Release Prevention Program (CalARP; CCR Title 19, Division 2, Chapter 4.5) is to prevent accidental releases of those substances determined to potentially pose the greatest risk of immediate harm to the public and the environment, and to

minimize the consequences if releases do occur. These substances are called regulated substances and include both flammable and toxic hazardous materials listed on the Federal Regulated Substances for Accidental Release Prevention and on the State of California Regulated Substances lists. Businesses that handle regulated substances in industrial processes above threshold quantity levels are subject to CalARP program requirements.

The CalARP program requires businesses to have planning activities that are intended to minimize the possibility of an accidental release by encouraging engineering and administrative controls. It is further intended to mitigate the consequences of an accidental release, by requiring owners or operators of facilities to develop and implement an accident prevention program.

### California Building Code

The State of California provides a minimum standard for building design through the California Building Code (CBC; Part 2 of Title 24 of the CCR). It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to modification based on local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas. The CBC is updated on a 3-year cycle; it took effect on January 1, 2020.

### California Fire Code

The California Building Standards Code also contains the California Fire Code (CFC), included as Part 9 of 24 CCR. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. The LACoFD provides fire protection services for the unincorporated areas of Los Angeles County—including the FFTOD Specific Plan Area—and implements and enforces the CFC on site. The CFC is updated on a 3-year cycle; it took effect on January 1, 2020.

### Asbestos-Containing Materials Regulations

Asbestos is a naturally occurring fibrous material that was used as a fireproofing and insulating agent in building construction before being banned by EPA in the 1970s; some nonfriable use of asbestos in roofing materials still exists. In conjunction with the EPA and OSHA, State-level agencies regulate removal, abatement, and transport procedures for asbestos-containing materials (ACMs). Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations; medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. In addition, the regulations include warnings and practices to reduce the risk for asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos. Due to the age of the buildings within the FFTOD Specific Plan Area, it is likely that ACMs are present.

### Polychlorinated Biphenyls

The EPA prohibited the use of PCBs in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (U.S. Code, Title 15, Section 2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline highly specific safety procedures for their disposal. The state likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed accordingly. At lower concentrations for nonliquids, regional water quality control boards may exercise discretion over the classification of such wastes. Due to the age of the buildings within the FFTOD Specific Plan Area, it is likely that PCBs are present.

### Lead-Based Paint

Cal/OSHA's Lead in Construction Standard (8 CCR Section 1532.1) addresses permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification. Due to the age of the buildings within the FFTOD Specific Plan Area, it is likely that lead-based paints (LBPs) are present in the existing structures.

### Government Code Section 65962.5, Cortese List

The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List" (after the legislator who authored and enacted the legislation). The list—or a site's presence on the list—has bearing on the local permitting process as well on compliance with the California Environmental Quality Act (CEQA). The DTSC compiles and updates as appropriate—at least annually—and shall submit a list of the following to the Secretary for Environmental Protection:

1. All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the HSC
2. All land designated as hazardous waste property or border zone property pursuant to Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the HSC
3. All information received by the DTSC pursuant to Section 25242 of the HSC on hazardous waste disposals on public land
4. All sites listed pursuant to Section 25356 of the HSC
5. All sites included in the Abandoned Site Assessment Program

The State Department of Health Services compiles and updates as appropriate—but at least annually—and shall submit a list of all public drinking water wells that contain detectable levels of organic contaminants and are subject to water analysis pursuant to Section 116395 of the HSC to the Secretary for Environmental Protection:

The SWRCB compiles and updates as appropriate—but at least annually—and shall submit a list of all of the following to the Secretary for Environmental Protection,:

1. All underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the HSC
2. All solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the DTSC pursuant to subdivision (e) of Section 13273 of the Water Code
3. All cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, that concern the discharge of wastes that are hazardous materials

The local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the CCR, compiles as appropriate—but at least annually—and shall submit a list of all solid waste disposal facilities from which there is a known migration of hazardous waste to the California Integrated Waste Management Board. The California Integrated Waste Management Board compiles the local lists into a statewide list, which is submitted to the Secretary for Environmental Protection and available to any person who requests the information.

The Secretary for Environmental Protection consolidates the information submitted pursuant to this section and distributes it in a timely fashion to each city and county where sites on the lists are located. The information can be distributed to any other person on request. The secretary may charge a reasonable fee to people requesting the information, other than cities, counties, or cities and counties, to cover the cost of developing, maintaining, and reproducing and distributing the information.

### 3.7.2.3 Local

#### Los Angeles County Code, Title 11—Health and Safety

Title 11, Health and Safety, of the Los Angeles County Code contains regulations addressing issues such as public health, hazardous commercial and residential operations, water hazards, and storage of hazardous materials. Division 2, General Hazards, covers a variety of hazardous industrial and residential conditions by providing "minimum standards to safeguard life, limb, safety and public welfare by requiring protections from hazardous bodies of water, wells and other defined excavations and abandoned chests, not presently covered by statutes of the state of California" (Los Angeles County Code, Section 11.40.020). Division 4, Underground Storage of Hazardous Materials, prevents and controls unauthorized discharges of hazardous materials from underground storage tanks (Los Angeles County Code, Section 11.72.020).

#### Los Angeles County General Plan 2035 Safety Element

The Safety Element of the Los Angeles County General Plan, in conjunction with the All-Hazard Mitigation Plan prepared by the Chief Executive Office, Office of Emergency Management, sets strategies for natural and human-made hazards in Los Angeles County (DRP 2015). The All-Hazard Mitigation Plan, which has been approved by FEMA and the CalEMA, includes a compilation of known and projected hazards in Los Angeles County. The following policies of the Safety Element pertain to the project:

- **Policy S 3.9:** Adopt by reference the County of Los Angeles Fire Department Strategic Fire Plan, as amended.

- **Policy S 4.1**: Ensure that residents are protected from the public health consequences of natural or human-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- **Policy S 4.2**: Support Los Angeles County emergency providers in reaching their response time goals.
- **Policy S 4.3:** Coordinate with other Los Angeles County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.
- **Policy S 4.4:** Encourage the improvement of hazard prediction and early warning capabilities.

***Los Angeles County All-Hazard Mitigation Plan***

The Los Angeles County All-Hazard Mitigation Plan covers mitigation responsibilities of Los Angeles County departments and unincorporated communities, including Florence-Firestone. It establishes Los Angeles County's emergency policies and procedures in the event of a disaster. It ensures the most effective allocation of resources for the maximum benefit and protection of the public during an emergency. It conforms to the requirements of FEMA Disaster Mitigation Act of 2000. The law requires extensive documentation of the community, the region, its hazards, history, and future plans.

## 3.7.3 Methodology

To determine if hazardous waste sites exist in the FFTOD Specific Plan area, a search of available environmental records was conducted. The DTSC's EnviroStor Data Management System was reviewed for the FFTOD Specific Plan Area. The GeoTracker database operated by the Regional Water Quality Control Board (RWQCB) is the SWRCB's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup as well as permitted facilities such as operating USTs and land disposal sites. DTSC's EnviroStor Data Management System provides all existing information on permits and corrective action at hazardous waste facilities, as well as cleanup projects. Based on the above review, the presence of land uses that generate hazardous materials or the presence of hazardous materials within soils and/or groundwater could affect existing residents, students and/or employees within and directly adjacent to the FFTOD Specific Plan Area. If corrective actions are currently underway, it is unlikely for potentially significant impacts to occur because a federal, state, or local agency involved is resolving the issue.

### 3.7.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
- 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

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school
- Be situated on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

The thresholds listed below were scoped out of the analysis in the Initial Study (Appendix A), and are only described in Chapter 5, Other CEQA Considerations:

- For a project situated in 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 or excessive noise for people residing or working in the project area
- Expose people or structures—either directly or indirectly—to a significant risk of loss, injury or death involving fires, because the project:
    - Is in a high fire hazard area with inadequate access
    - Is in an area with inadequate water and pressure to meet fire flow standards
    - Is in proximity to land uses that have the potential for dangerous fire hazard
    - Constitutes a potentially dangerous fire hazard

## 3.7.4 Environmental Impacts

**HAZ-1:** *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Construction in accordance with implementation of the FFTOD Specific Plan would involve demolition, grading, and construction of new buildings. Potentially hazardous materials used during typical construction activities include substances such as paints, sealants, solvents, adhesives, cleaners, and diesel fuel. There is potential for these materials to spill or to create hazardous conditions. However, the materials used typically would not be in such quantities or stored in a manner that would pose a significant safety hazard. These activities would also be short-term or one-time in nature. Project construction workers would be trained in safe handling and hazardous materials use.

To prevent hazardous conditions, existing local, state, and federal laws (such as those listed in Section 3.7.3, Regulatory Setting) are enforced at the construction sites. For example, compliance with existing regulations would ensure that construction workers and the general public are not exposed to any risks related to hazardous materials during demolition and construction activities. Cal/OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

In addition, although construction activities would be in and near existing sensitive uses, including residences and schools, strict adherence to all emergency response plan requirements set forth by LACoFD would be required throughout the duration of project construction. Any hazardous materials and hazardous wastes associated with construction and operation of future development projects related to implementation of the FFTOD Specific Plan would be transported to and/or from the project site in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation (DOT) regulations listed in 49 CFR, Hazardous Materials Transportation Act; California Department of Transportation standards; California Vehicle Code (Title 13 of the CCR); and Cal/OSHA standards. Any project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with Subtitle C of the RCRA (40 CFR Part 263), including the management of nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances.

Operation of the FFTOD Specific Plan would include new or different land use designations that may involve the routine use of substances classified as hazardous materials including fuels, pesticides, paints, and other materials. Hazardous materials would be required to be used, transported, and disposed of in compliance with existing regulations and guidelines.

Upon compliance with federal, state, and Los Angeles County regulatory requirements, construction and operation activities of future development projects related to implementation of the FFTOD Specific Plan would not pose substantial hazards to the public or the environment, and impacts would be less than significant.

**HAZ-2:** *Would the project 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?*

The use, storage, and transport of hazardous materials and hazardous wastes in compliance with the laws and regulations described above would minimize the potential for releases of hazardous materials that could pose substantial hazards to the public or the environment and would entail prompt containment and cleanup of spills.

The FFTOD Specific Plan Area currently contains properties that store, generate, and/or dispose of hazardous materials. While most known soil and/or groundwater contamination sites have been remediated or are in the process of remediation, some sites that have been identified require evaluation and it is possible that implementation of infill projects within the FFTOD Specific Plan Area could expose unknown soil contamination during construction activities. If any unidentified sources of contamination are encountered during grading or excavation, identification and removal work would be required according to federal, state, and local standards. Adherence to the regulatory requirements would reduce potential impacts related to unknown contaminated sites to less than significant.

Several LUST sites were identified in the GeoTracker database search. It is also possible that old USTs that were in use prior to permitting and recordkeeping requirements may be present in the FFTOD Specific Plan Area. If an unidentified UST is uncovered or disturbed during construction activities, it would be closed in place or removed. Removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank

contents or vapors. Potential risks—if any—posed by USTs would be minimized by managing the tank according to existing state and local regulations.

Because of the age of buildings within the FFTOD Specific Plan Area and because the area has land uses that could generate a variety of potential sources of contamination, a variety of potential sources of contamination exists. These uses include cleaners, auto-repair facilities, and gas stations that are typically associated with hazardous materials. However, any new development activities that identify undocumented hazardous materials would be required to remediate and cleanup under the regulations and supervision of the DTSC and/or the RWQCB. Any new developments that identify undocumented contamination would be required to be remediated and cleaned up under the regulations and supervision of the DTSC and/or the RWQCB, which would reduce potential impacts to less than significant.

Construction contractors would maintain equipment and supplies on their construction sites for containing and cleaning up hazardous materials spills and would train their staff on such containment and cleanup. In addition, regulatory requirements, including those listed above in HAZ-1, would further enforce compliance with U.S. DOT, Cal/OSHA, and LACoFD pertaining to hazardous materials and wastes.

Still, the demolition of buildings has the potential to expose and disturb asbestos containing ACMs and LBP. Demolition can cause encapsulated ACMs (if present) to become friable; they are considered a carcinogen once airborne. Demolition of the existing buildings and structures can also release lead into the air if LBP is not properly removed and handled. Such releases could pose significant risks to people living and working in and around the project site as well as to project construction workers. Abatement of all ACM and LBP encountered during any future building demolition would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and South Coast Air Quality Management District (SCAQMD).

The EPA requires that all asbestos work performed in regulated areas be supervised by a competent person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, 40 CFR Part 763). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACMs prior to any demolition or renovation activities. Should ACMs be identified, Rule 1403 requires that ACMs be safely removed and disposed of at a regulated site, if possible. If it is not possible to safely remove ACMs, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of asbestos. In addition, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of CCR Title 8, Section 1529 (Asbestos), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

Cal/OSHA regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, as well as the safe demolition of buildings containing LBP or other lead materials. In addition, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of CCR Title 8, Section 1532.1 (Lead), which establishes exposure limits, exposure

monitoring, respiratory protection, and good working practice by workers exposed to lead. The potential exposure of construction workers to ACMs or LBP is a potentially significant impact.

In addition, construction activities of future development projects related to implementation of the FFTOD Specific Plan would not result in accident conditions involving the release of hazardous materials into the environment upon compliance with federal, state, and Los Angeles County regulatory requirements; impacts would be less than significant.

During operation, businesses handling reporting quantities of hazardous or extremely hazardous materials would maintain business plans with procedures in the event of a hazardous materials release, including immediate notification of all appropriate agencies and personnel, identification of local emergency medical assistance, contact information for company emergency coordinators, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. Upon compliance with federal, state, and Los Angeles County regulatory requirements, operational activities of future development projects related to implementation of the FFTOD Specific Plan would not result in accident conditions involving the release of hazardous materials into the environment; impacts would be less than significant.

**HAZ-3:** *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The FFTOD Specific Plan Area includes a total of nine elementary schools, five middle schools, three high schools, and two private schools. There are an additional two schools within 0.25 mile of the Change Area (Aspire Titan Academy and Alliance Collins Family College-Ready High School). Industrial uses are currently the second most common land use within the FFTOD Specific Plan Area; implementation of the FFTOD Specific Plan would result in infill development with comparable uses. Specifically, the proposed IF Zone allows uses focused on light industrial, neighborhood-serving commercial and office and does not allow residential uses. Therefore, project buildout would result in usage and storage of hazardous materials on site and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions. Project operation could emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur; impacts would be less than significant.

**HAZ-4:** *Would the project be situated on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would it create a significant hazard to the public or the environment as a result?*

Lists of hazardous materials sites found on lists compiled pursuant to Government Code Section 65962.5 that occur within or in the vicinity of the FFTOD Specific Plan Area are provided in Table 3.7-1 and Table 3.7-2. A list of 116 sites within the FFTOD Specific Plan that have varying degrees of known contamination or reasons to investigate further is provided in Table 3.7-1. These sites include state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. The list also includes sites that are being investigated for suspected but unconfirmed contamination. A list of the 15 sites within the FFTOD Specific Plan Area that could affect groundwater quality is provided in Table 3.7-2. Future redevelopment of individual properties within the FFTOD Specific Plan Area could have unknown

recognized environmental conditions related to soils, groundwater, and vapors/gases that could create a significant hazard to the public or the environment.

**HAZ-5:** *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Implementation of the FFTOD Specific Plan is not anticipated to include any roadway changes and improvements that would result in inadequate emergency access. It is possible that during the construction phase of future transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access to and within the FFTOD Specific Plan Area. Final roadway changes and improvements are not anticipated to result in inadequate emergency access. Similarly, for development projects, future development pursuant to implementation of the FFTOD Specific Plan would also require construction, which may result in construction traffic that could impede emergency access to and within the FFTOD Specific Plan Area. However, this impediment would also be temporary (Section 3.14, Transportation). Many construction projects are required to submit construction traffic management plans to the Los Angeles County Public Works Traffic and Lighting Division for review and approval. Based on this analysis and with compliance to any requirements deemed necessary for approval of the Traffic and Lighting Division, impacts to emergency access would be less than significant.

## 3.7.5 Programmatic Mitigation Measures

In order to reduce the impacts to ACMs or LBP and redevelopment on a site included on a list of hazards materials pursuant to Government Code Section 65962.5 to less than significant, the following programmatic mitigation measures would need to be implemented:

**MM HAZ-1** Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant.

**MM HAZ-2** Applicants for future development projects on former or industrial sites shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall

be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.

Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.

Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to Los Angeles County evidencing that all site remediation activities have been completed.

## 3.7.6 Level of Significance After Mitigation

The programmatic mitigation measures identified above would reduce potential impacts associated with hazards and hazardous materials to less than significant. Implementation of programmatic mitigation measure MM-HAZ-1 would require a survey prior to any demolition to characterize the potential exposure and potential release of ACM or LBPs. Implementation of programmatic mitigation measure MM-HAZ-2 would require the project applicant to prepare and submit a Phase I ESA to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present, would reduce the impacts of redevelopment on a site that is included on a list of hazards materials site, to less than significant. Therefore, no significant unavoidable adverse impacts relating to hazards and hazardous materials have been identified for the project.

## 3.7.7 Cumulative Impacts

Cumulative impacts occur when the potential impacts of one project are compounded with impacts of other development projects or from growth in the FFTOD Specific Plan Area. Hazards and hazardous materials impacts are compounded when multiple development projects would increase the presence of hazardous materials near the FFTOD Specific Plan Area or the potential for hazardous accidents to occur; however, use, transport, storage, and disposal of hazardous materials for all future projects within the FFTOD Specific Plan Area would be governed by the same regulations and agencies listed in this impact analysis. Implementation of existing regulations would minimize potential hazards from accidental release of hazardous materials. Other projects outside of the FFTOD Specific Plan Area would be subject to independent CEQA review, and projects that could expose people at schools within 0.25 mile to substantial hazards through emissions of hazardous substances would be required to implement feasible mitigation measures to reduce those hazards.

Projects adjacent to the FFTOD Specific Plan Area may be proposed on sites listed on environmental databases. CEQA review for these projects would include environmental site assessments (e.g., Phase I, II, or III ESAs). For projects within the FFTOD Specific Plan Area, when contaminated soil, soil vapor, or water are discovered on a site, cleanup to appropriate regulatory levels would be required before proposed land uses could be approved where people could come into contact with the contaminated material. Overall, continued compliance with laws and regulations governing hazardous materials and hazardous wastes described in Section 3.7.3

and implementation of regulatory requirements would ensure impacts on hazards and hazardous materials are not cumulatively considerable for buildout of the project. Such regulatory requirements would include practices in compliance with the U.S. DOT and Cal/OSHA standards for hazardous materials and hazardous waste transportation; the requirement that all hazardous waste generation, transportation, treatment, storage, and disposal be in compliance with the RCRA and the LACoFD as the designated CUPA; the requirement that all UST repairs or removals be conducted in accordance with the California Underground Storage Tank Regulations with oversight from the RWQCB, DTSC, LACoFD, SCAQMD and/or other regulatory agencies, as needed; the requirement that project construction within 10 feet of or crossing existing high-pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts be designed in accordance with CCR, Title 9, Section 1541; and the requirement that any project-related demolition activities that have the potential to expose construction workers and/or the public to ACMs or lead-based LBP will be conducted in accordance with applicable regulations, including—but not limited to—SCAQMD's Rule 1403, California HSC Section 39650 et seq., and CCR Title 8, Section 1529.

In addition to existing regulations, Programmatic Mitigation Measures HAZ-1 through HAZ-2 would reduce potentially significant impacts of the project related to hazardous materials to a level that is less than significant with mitigation incorporated. Therefore, the project's contribution to cumulative hazards to the public or environment would be less than cumulatively considerable.

## 3.7.8 References

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# 3.8 HYDROLOGY AND WATER QUALITY

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact hydrology and water quality conditions. Hydrology deals with the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface and groundwater. Surface water includes lakes, rivers, streams, and creeks; groundwater is under the Earth's surface.

## 3.8.1 Environmental Setting

### 3.8.1.1 Surface Water Hydrology

#### Regional Drainage

The FFTOD Specific Plan Area is within the Los Angeles River Watershed, which covers 834 square miles of land, spanning from its headwaters that originate in the Santa Monica, Santa Susana, and San Gabriel mountains in the west and north to San Pedro Bay. The watershed is shaped by the path of the Los Angeles River, which flows from its headwaters in the mountains east to the northern corner of Griffith Park; the channel then turns south and passes through the Glendale Narrows before flowing across the coastal plain and into San Pedro Bay near Long Beach.

As a result of intense urban development, the Los Angeles River has been transformed from an uncontrolled, meandering river providing a valuable source of water for early inhabitants to a mostly channelized flood protection waterway (Los Angeles County Public Works 2015).

#### Local Drainage

The FFTOD Specific Plan Area is completely developed and urbanized, occupied by residential, commercial, retail, and industrial land uses; the ground surface is generally flat, sloping gently from approximately 175 feet above mean sea level (amsl) in the northwest to 115 feet amsl in the southeast (Yamazaki et al. 2017). Stormwater in the FFTOD Specific Plan Area is managed by open channel flow in curb and gutter as the primary conveyance. The storm drainage system is a combination of public and privately maintained channels, including a majority of segments that are maintained by Los Angeles County Public Works within the Los Angeles County Flood Control District, a segment running along Nadeau Street east from Graham Avenue that is maintained by Los Angeles County Road Maintenance Division, and several drains in the area being maintained by private entities (AECOM 2021).

The entire system is gravity fed, reinforced concrete pipe from 18 inch to 90 inch, mostly 24 inches to 48 inches in diameter. Each branch empties into higher flow reinforced concrete boxes (RCBs) ranging 51 inches to 84 inches high and 54 inches to 105 inches wide running under Hooper Avenue on the western side of the FFTOD Specific Plan Area and under Crockett Boulevard and Hickory Street on the eastern side; comprising the Hooper Avenue Drain and Glen Avenue Drain systems, respectively. Both drains empty into Compton Creek Upper before emptying into the Los Angeles River.

Stormwater flow is typically north to south in the FFTOD Specific Plan Area. West of Graham Avenue, the flow is from east to west along Florence Avenue, Nadeau Street, and Firestone

Boulevard. East of Graham Avenue, the flow is west to east along same roads. The drains eventually outlet to Compton Creek, approximately 1.3 miles south of the FFTOD Specific Plan Area. Compton Creek flows southeast and discharges into Reach 2 of the Los Angeles River approximately 8 miles southeast of the FFTOD Specific Plan Area. Reach 2 of the Los Angeles River drains to Reach 1, which then discharges into the Los Angeles River Estuary at the River-Pacific Ocean interface. The overall stormwater system in the FFTOD Specific Plan Area is shown in Figure 3.8-1.

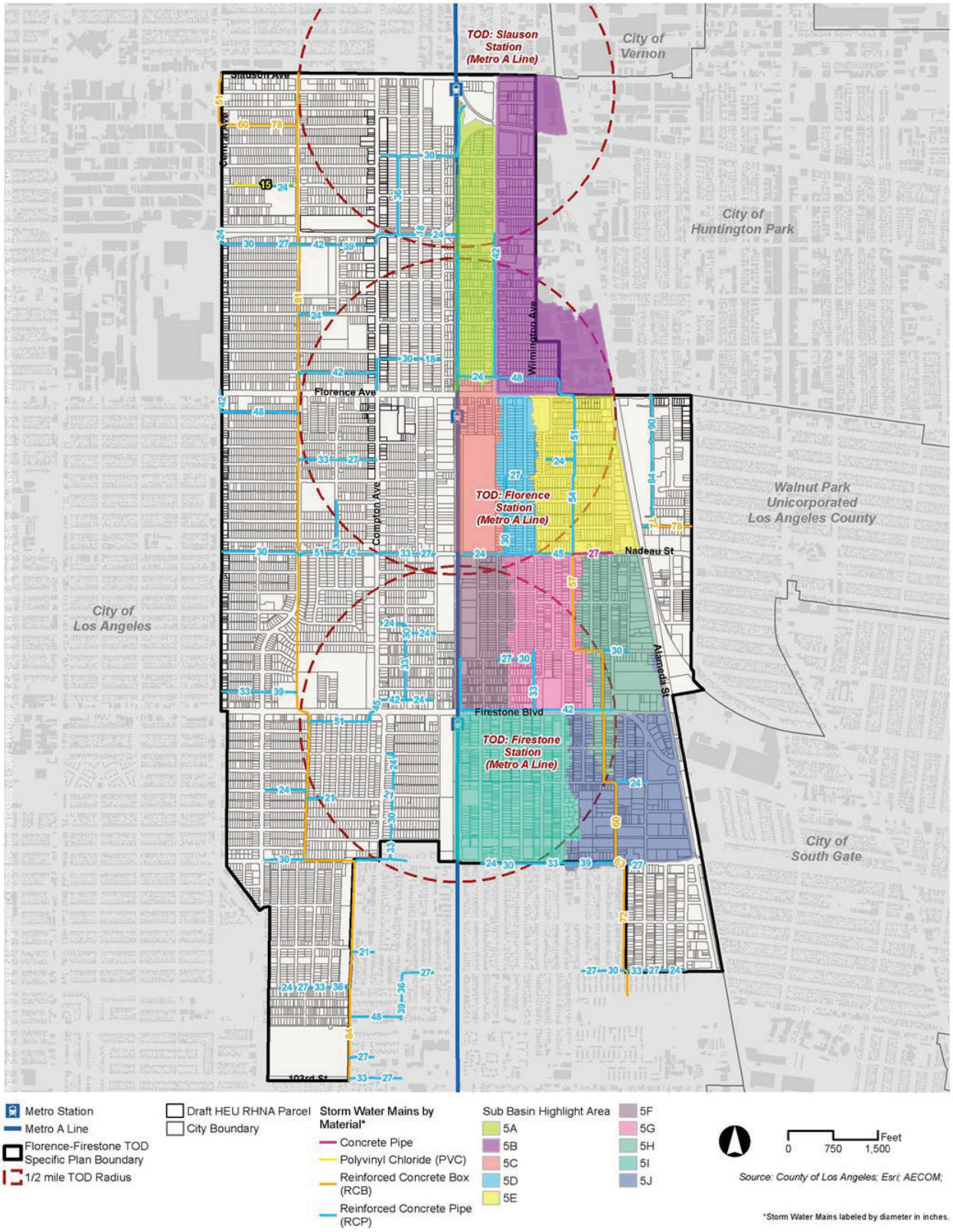
Section 303(d) of the federal Clean Water Act (CWA) requires states to identify waterbodies that are "impaired," or those that do not meet water quality standards and are not supporting their beneficial uses. Total Maximum Daily Loads (TMDLs) are then designed to serve as pollution control plans for these specific pollutants. As provided in Table 3.8-1, all bodies of water are impaired with various pollutants and some TMDLs have already been developed for these impairments (CalEPA 2019).

**Table 3.8-1: TMDLs for Bodies of Water in Vicinity of FFTOD Specific Plan Area**

| Reach | Impairment(s) | Source(s) | TMDL Date of Completion |
|---|---|---|---|
| Compton Creek | • Benthic macroinvertebrate bioassessments<br>• Coliform bacteria<br>• Copper<br>• Lead<br>• Trash<br>• pH | • Source Unknown<br>• Point and nonpoint<br>• Point and nonpoint<br>• Point and nonpoint<br>• Nonpoint<br>• Point and nonpoint | • 2021<br>• 2009<br>• 2005<br>• 2005<br>• 2008<br>• 2004 |
| Los Angeles River Reach 2 (Carson Street to Figueroa Street) | • Ammonia<br>• Coliform bacteria<br>• Copper<br>• Lead<br>• Nutrients<br>• Oil<br>• Trash | • Point and nonpoint<br>• Point and nonpoint<br>• Unknown<br>• Point and nonpoint<br>• Point and nonpoint<br>• Nonpoint<br>• Urban runoff/storm sewers, nonpoint, surface runoff | • 2004<br>• 2009<br>• 2005<br>• 2005<br>• 2004<br>• 2009<br>• 2008 |
| Los Angeles River Reach 1 (Estuary to East Carson Street) | • Ammonia<br>• Cadmium<br>• Coliform bacteria<br>• Copper, dissolved<br>• Cyanide<br>• Diazinon<br>• Lead<br>• Nutrients (Algae)<br>• Trash<br>• Zinc, Dissolved<br>• pH | • Unspecified point and nonpoint<br>• Unknown source<br>• Point and nonpoint<br>• Point and nonpoint<br>• Unknown source<br>• Unknown source<br>• Point and nonpoint<br>• Point and nonpoint<br>• Urban runoff/storm sewers, surface runoff, nonpoint<br>• Point and nonpoint<br>• Point and nonpoint | • 2004<br>• 2005<br>• 2009<br>• 2005<br>• 2019<br>• 2019<br>• 2005<br>• 2004<br>• 2008<br>• 2005<br>• 2003 |
| Los Angeles Estuary | • Chlordane, sediment<br>• DDT, sediment<br>• PCBs<br>• Sediment Toxicity<br>• Trash | • Nonpoint<br>• Nonpoint<br>• Nonpoint<br>• Source unknown<br>• Nonpoint, urban runoff/storm sewers, surface runoff | • 2019<br>• 2019<br>• 2019<br>• 2019<br>• 2008 |

Notes: DDT = dichlorodiphenyltrichloroethane; PCB = polychlorinated biphenyl; TMDL = Total Maximum Daily Load

**Figure 3.8-1: Stormwater System in FFTOD Specific Plan Area**



## Groundwater

Los Angeles County is in the Coastal Plain of Los Angeles Groundwater Basin, which is composed of four groundwater subbasins: the Santa Monica, Hollywood, West Coast, and Central subbasins (DWR 2013). The FFTOD Specific Plan Area is underlain by the Central Subbasin (Central Basin), which is 270 square miles and underlies portions of the Los Angeles River, Upper San Gabriel, and San Gabriel River/Rio Hondo Enhanced Watershed Management Program areas (DWR 2003). Recharge to the Central Basin occurs primarily by engineered recharge of stormwater, imported water, and reclaimed water along the upper reaches of the San Gabriel River and the Rio Hondo via the San Gabriel River Water Conservation System. This system is a series of dams, spreading grounds, and instream recharge systems that facilitate groundwater recharge into the Main San Gabriel Basin and Montebello Forebay of the Central Basin. Recycled water has been also delivered for recharge in the Montebello Forebay since 1962. Finally, the Central Basin includes one seawater intrusion barrier, the Alamitos Gap Seawater Intrusion Barrier, fed by treated imported water along with advanced water treatment recycled water (WRD 2016).

Groundwater quality reflects current and historical land uses. As a highly urban area, commercial and industrial activities have resulted in contamination due to leaking aboveground and underground storage tanks, leaking sewer and oil pipelines, spills, and illegal discharges. Many groundwater contamination plumes consist of priority contaminants such as petroleum fuels and additives (e.g., methyl tert-butyl ether), solvents (e.g., trichloroethylene and perchloroethylene), herbicides (e.g., atrazine, simazine, prometon), and other hazardous/toxic substances (e.g., arsenic, perchlorate). In general, contaminated plumes are found in shallow groundwater; however, as the aquifers and confining layers in these alluvial basins are typically interfingered, the quality of groundwater in the deeper production aquifers is threatened by the migration of pollutants from the upper aquifers (WRD 2016).

Between the 1900s and 1950s, groundwater was an important factor in urbanization of the Central basins. Excessive overpumping in the basins caused severe overdraft (i.e., lowered groundwater levels) and created a hydraulic gradient that resulted in seawater intrusion, which contaminated the coastal groundwater aquifers. To address this problem and halt the intrusion, three seawater intrusion barriers were constructed. While the water injection activities at the barriers were successful in halting further seawater intrusion, these efforts could not address the seawater that had already intruded into the Central and West Coast Basins before the barriers were constructed. These large plumes of saline water, referred to as “saline plumes,” are trapped inland of the injection wells, thereby degrading significant volumes of groundwater with high concentrations of chloride and total dissolved solids and decreasing the ability of affected aquifers to provide groundwater storage (WRD 2016).

In general, groundwater is of good quality in the main producing aquifers of the Central Basins. Localized areas of marginal to poor quality water exist, primarily at the basin margins where seawater intrusion occurred in the past and also in mostly shallow groundwater near environmental release sites. Groundwater has also been impacted by industrial activities that have introduced highly mobile human-made organic compounds such as solvents and fuel additives. These contaminated groundwater plumes are well documented. Areas of these contaminant plumes are designated to restrict recharge activities that may create an increased driver for contaminant migration (WRD 2016).

According to the Groundwater Wells map managed by the Los Angeles County Public Works, the groundwater level measured by wells within and in the vicinity of the FFTOD Specific Plan Area ranges from approximately 160 to 200 feet below ground surface (Los Angeles County Public Works 2021).

## 3.8.2 Regulatory Setting

### 3.8.2.1 Federal

#### Clean Water Act

The federal Water Pollution Control Act (or CWA) is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the Waters of the United States (U.S.) and gives the U.S. Environmental Protection Agency (EPA) authority to implement pollution control programs, such as setting wastewater standards for industries. The statute's goal is to completely end all discharges and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates direct and indirect discharge of pollutants, sets water quality standards for all contaminants in surface waters, and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges; requires states to establish site-specific water quality standards for navigable bodies of water; and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA funds the construction of sewage treatment plants and recognizes the need for planning to address nonpoint sources of pollution. Section 402 of the CWA requires a permit for all point source (i.e., a discernible, confined, and discrete conveyance, such as a pipe, ditch, or channel) discharges of any pollutant (except dredge or fill material) into Waters of the U.S.

#### National Pollutant Discharge Elimination System

Under the National Pollutant Discharge Elimination System (NPDES) program (under Section 402 of the CWA), all facilities that discharge pollutants from any point source into Waters of the U.S. must have a NPDES permit. The term "pollutant" broadly applies to any type of industrial, municipal, and agricultural waste discharged into water. Point sources can be publicly owned treatment works (POTWs), industrial facilities, and urban runoff. The NPDES program addresses certain agricultural activities, but the majority are considered nonpoint sources and are exempt from NPDES regulation. Direct sources discharge directly to receiving waters, and indirect sources discharge to POTWs, which in turn discharge to receiving waters. Under the NPDES program, permits are issued only for direct, point-source discharges. The National Pretreatment Program addresses industrial and commercial indirect dischargers. Municipal sources are POTWs that receive primarily domestic sewage from residential and commercial customers. Specific NPDES program areas applicable to municipal sources are the National Pretreatment Program, the Municipal Sewage Sludge Program, Combined Sewer Overflows, and the Municipal Storm Water Program. Nonmunicipal sources include industrial and commercial facilities. Specific NPDES program areas applicable to these industrial/commercial sources are: Process Wastewater Discharges, Nonprocess Wastewater Discharges, and the Industrial Storm Water Program. NPDES issues two basic permit types: individual and general. The EPA has focused on integrating the NPDES program further into watershed planning and permitting (EPA 2012).

The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All counties with storm drain systems that serve a population of 100,000 or more, as well construction sites 1 acre or more in size, must file for and obtain an NPDES permit. Another measure for minimizing and reducing pollutant discharges to a publicly owned conveyance or system of conveyances (including roadways, catch basins, curbs, gutters, ditches, human-made channels, and storm drains designed or used for collecting and conveying stormwater) is the EPA's Storm Water Phase I Final Rule. The Phase I Final Rule requires an operator (such as a city) of a regulated municipal separate storm sewer system (MS4) to develop, implement, and enforce a program (e.g., best management practices [BMPs], ordinances, or other regulatory mechanisms) to reduce pollutants in postconstruction runoff to Los Angeles County's storm drain system from new development and redevelopment projects that result in land disturbance greater than or equal to 1 acre.

The MS4 Permit in effect for the FFTOD Specific Plan Area is Order No. R4-2012-0175-A01 issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) in 2012 and amended in 2016 (LARWQCB 2016). The Los Angeles County Public Works enforces conditions of the MS4 NPDES permit on development and redevelopment projects under Los Angeles County's jurisdiction.

### 3.8.2.2 State

#### Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Section 13000 et seq.) is the basic water quality control law for California. Under this act, the State Water Resources Control Board (SWRCB) has ultimate control over state water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The state is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine Regional Water Quality Control Boards, carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a water quality control plan or basin plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The FFTOD Specific Plan Area is in the jurisdiction of LARWQCB Region 4, which encompasses the Los Angeles and Santa Monica Bay watersheds. The Basin Plan for Region 4 was adopted in 1995 and amended in 2020 (LARWQCB 2014). This Basin Plan gives direction on the beneficial uses of the state waters in Region 4, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the standards in the Basin Plan.

#### Construction General Permit Order No. 2009-0009-DWQ

Pursuant to the CWA, the SWRCB issued a statewide general NPDES permit for stormwater discharges from construction sites in 2001 (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ and 2012-0006-DWQ; NPDES No. CAS000002). The permit has been administratively extended until a new order is adopted and becomes effective (SWRCB 2021). Under this Statewide General Construction Activity permit, discharges of stormwater from construction sites with a disturbed area of one acre or more are required to either obtain individual NPDES permits for stormwater discharges or be covered by the General Permit. Coverage by the

General Permit is accomplished by completing and filing a Notice of Intent with the SWRCB and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). Each applicant under the General Construction Activity Permit must ensure that a SWPPP is prepared prior to grading and is implemented during construction. The SWPPP must list BMPs implemented on the construction site to protect stormwater runoff and must contain a visual monitoring program, a chemical monitoring program for "nonvisible" pollutants to be implemented if there is a failure of BMPs, and a monitoring plan if the site discharges directly to a waterbody listed on the state's 303(d) list of impaired waters.

#### 3.8.2.3 Local

##### NPDES Permit No. CAS004001 (Municipal Separate Storm Sewer System Permit)

The FFTOD Specific Plan is subject to the waste discharge requirements of the NPDES permit no. CAS004001 and the Los Angeles County MS4 permit (Order No. R4-2012-0175), which was amended by Order R4-2012-0175-A01 on September 8, 2016 (LARWQCB 2016). The Los Angeles County Flood Control District, Los Angeles County, and 84 incorporated cities in Los Angeles County (except Long Beach) are permittees under the MS4 permit. The permit covers approximately 3,100 square miles and serves a population of about 10 million. Permittees are required to comply with applicable water quality effluent limitations, develop and implement procedures necessary to reduce the discharge of pollutants into the MS4s to the maximum extent practicable, and implement BMPs. The FFTOD Specific Plan is required to comply with the Los Angeles County MS4 permit and Los Angeles County's stormwater management program.

Los Angeles County's MS4 permit also requires new development and redevelopment projects to retain a specified volume of stormwater runoff on site from a design storm event. Los Angeles County has adopted a low impact development (LID) ordinance and prepared a LID manual as a guideline for implementation of these requirements.

##### Los Angeles County Low Impact Development Standards Manual

Los Angeles County prepared the 2014 Low Impact Development Standards Manual (LID Standards Manual) to comply with the requirements of the MS4 permit (Los Angeles County Public Works 2014). The LID Standards Manual is an update and compilation of the following documents:

- Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (September 2002)
- Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (2004 Design Manual, February 2004)
- Stormwater Best Management Practice Design and Maintenance Manual (2010 Design Manual, August 2010)
- Low Impact Development Standards Manual (2009 LID Manual, January 2009)

The LID manual addresses the following objectives and goals:

- Lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other waterbodies

- Minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs, and other LID strategies
- Minimize erosion and other hydrologic impacts on all projects within natural drainage systems that have not been improved by requiring projects to incorporate properly designed, technically appropriate hydromodification control development principles, and technologies

Projects that are identified as "designated projects" are required to implement site design/LID and source control BMPs applicable to their specific designated project categories and treatment control BMPs where necessary. Designated projects include new industrial or commercial developments 10,000 square feet or more; restaurants, gas stations, or parking lots 5,000 square feet or more; and projects creating or replacing 5,000 square feet or more of impervious surfaces. Selection of LID and additional treatment control BMPs is based on the pollutants of concern for the specific project site and the BMP's ability to effectively treat those pollutants.

The LID Standards Manual also has requirements for nondesignated projects. For small-scale nondesignated projects (residential development and redevelopment of four units or less), at least two of the following simple BMPs are to be incorporated into the site design: porous pavement, downspout routing, disconnection of impervious surfaces, dry wells, landscaping and landscape irrigation interception of runoff, or green roofs. For large-scale nondesignated projects (all nondesignated residential developments of five units or greater and all nonresidential, nondesignated projects), the change in Stormwater Quality Design Volume (SWQDv) must be retained through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless technically infeasible. To meet these requirements, large-scale nondesignated projects must conduct site assessment and identify design considerations, apply site-specific source control measures, calculate the change in SWQDv, implement stormwater quality control measures, implement any necessary hydromodification requirements, and develop a maintenance plan, if necessary.

### Green Infrastructure Guidelines

The Green Infrastructure Guidelines provide guidance for new construction and reconstruction of road and flood projects. The goal of the guidelines is to incorporate sustainable practices into the design, construction, and operation of Los Angeles County Public Works infrastructure. The guidelines provide LID design options to consider during planning or designing of road and flood projects intended to manage stormwater runoff.

All new development under the FFTOD Specific Plan shall:

- Demonstrate that site improvements do not introduce new flooding concerns upstream or downstream from the project
- Submit LID and/or SWPPPs—as required by the NPDES thresholds— to ensure preservation of water quality and mitigation of environmental impacts
- Incorporate BMPs, as appropriate to the project and parcel, consistent with the LID Manual and Green Infrastructure Guidelines

## 3.8.3 Methodology

The following analysis considers the existing environmental setting and regulatory environment applicable to the FFTOD Specific Plan Area. The analysis determines whether implementation of the FFTOD Specific Plan could adversely affect the quality of waterbodies during construction activities or result in a long-term increase in pollutant levels in stormwater originating from the FFTOD Specific Plan Area. The SWRCB 303(d) list was consulted to determine existing impairments in receiving waterbodies in the vicinity of the FFTOD Specific Plan Area. (these impairments are provided in Table 3.8-1). Considering the project characteristics and existing conditions, the following potential impacts were evaluated.

### 3.8.3.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines and the Los Angeles County Environmental Checklist Form, the project would have a significant impact on hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces in a manner which would:
    - result in substantial erosion or siltation on or off site;
    - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
    - 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
    - Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The following thresholds listed below were scoped out of the analysis in the Initial Study (Appendix A), and are only discussed in Chapter 5, Other CEQA Considerations:

- Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:
    - Impede or redirect flood flows which would expose existing housing or other insurable structures in a federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?
- Would the Project otherwise place structures in federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?

- Would the project conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?
- Would the project use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?
- Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

## 3.8.4 Environmental Impacts

**HWQ-1:** *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

### 3.8.4.1 Construction

Demolition of existing structures, removal of existing vegetation and trees, pavement and concrete replacement, grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities could expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving-water quality. Furthermore, construction generally requires the use of heavy equipment and construction-related substances and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. Because each future development project pursuant to implementation of the FFTOD Specific Plan would be required to comply with NPDES requirements, BMPs would be in place to prevent potentially harmful materials from being accidentally spilled or improperly disposed of during construction activities. These BMPs would also substantially reduce the potential for contaminated surface water to wash into and pollute surface waters or groundwater. Although the receiving waters of the FFTOD Specific Plan Area (Compton Creek, Reach 2 of the Los Angeles River, Reach 1 of the Los Angeles River, and the Los Angeles River Estuary) are impaired for several pollutants, compliance with the NPDES would substantially reduce the potential for pollutants from construction sites to exacerbate the current impairment of downstream receiving waters.

Each future development project would be assessed individually to ensure compliance with applicable NPDES requirements. Future development projects disturbing more than 1 acre of ground surface would be required to develop a SWPPP as part of compliance with the Construction General Permit that implements BMPs designed to prevent water quality degradation. Types of BMPs include erosion control, sediment control, waste management, and post-construction, all of which would prevent the introduction of pollutants into runoff, and consequentially, receiving waters. Projects disturbing less than 1 acre of ground surface during construction would not be required to prepare a SWPPP but would be required to implement the minimum BMPs required by the Los Angeles County MS4 permit, thereby protecting water quality. Further, all permitted construction activities in the FFTOD Specific Plan Area would be required to implement the BMPs specified in the County Stormwater Pollution Control Requirements for Construction Activities. As a result, construction impacts related to water quality standards or waste discharge requirements from implementation of the FFTOD Specific Plan would be less than significant.

### 3.8.4.2 Operation

As described above, the receiving waters of the FFTOD Specific Plan Area are impaired by several pollutants. Future development in the FFTOD Specific Plan Area would include residential, mixed use, commercial, and industrial uses; pollutants associated with these land uses typically include sediments, trash, petroleum products, metals, and chemicals. Development of a satisfying designated project characterization per the LID Standards Manual would retain the estimated SWQDv through implementation of retention, biofiltration, vegetation-based, and/or treatment-based stormwater quality control measures. If retainment of the SWQDv is not technically feasible, designated projects would be required to treat the SWQDv prior to its release or contribute to groundwater recharge. Large-scale nondesignated projects would implement stormwater quality control measures to retain the change in SWQDv and small-scale nondesignated projects would be required to implement specific site design BMPs to filter and/or reduce runoff. By retaining and/or treating runoff on site, the amount of potentially pollutant-laden runoff leaving the site and contaminating receiving waters would be substantially reduced. As specified by LID practices, the FFTOD Specific Plan would incorporate retention-based stormwater quality control measures (e.g., bioretention, infiltration basin, dry well, permeable pavement), biofiltration measures, and vegetation-based stormwater quality control measures (e.g., stormwater planter or planter box, vegetated swale, green roof).Compliance with regulations and implementation of LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines would minimize pollutants being transported off site into downstream receiving waters, and projects implemented in accordance with the FFTOD Specific Plan would not violate water quality standards or waste discharge requirements.

Buildout of the FFTOD Specific Plan will generate little increase in runoff to the existing drainage system because the area is completely developed and projects will be required to incorporate LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines. However, based on existing infrastructure within the two drain systems, existing and Specific Plan buildout infrastructure capacities differ.

The Hooper Avenue Drain, composed of the current underground drainage system west of the Southern Pacific railroad line, has adequate capacity to carry the peak flow of the 25-year storm, inclusive of FFTOD Specific Plan buildout. However, any future development project having a direct connection to the Hooper Avenue Drain would require a drainage analysis, that is part of an individual infrastructure assessment, to confirm the need for any upgrades.

The Glen Avenue Drain originates at 63rd Street and Gage Avenue. The drain leaves the FFTOD Specific Plan Area heading south under Croesus Avenue and carries the runoff from the entire eastern half of the FFTOD Specific Plan Area. Preliminary study results showed this 72-inch by 72-inch RCB has insufficient capacity to carry the peak flow runoff generated by the 25-year storm. As such, future development projects tributary to the Glen Avenue Drain may need to implement drainage solutions to allow the drain to function within its designed capacity, or implement capacity improvements to the system. A drainage analysis that would be part of an individual infrastructure assessment would be required for all future development projects to determine the necessary upgrades.

As shown in Figure 3.8-1, each highlighted section represents basins served by the Glen Avenue Drain that may experience underground drainage system overflows due to deficient underground

flow capacity, with associated stress placed on curb and gutter drainage to carry the excess. Although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity.

**HWQ-2:** *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Implementation of the FFTOD Specific Plan would include infill and redevelopment that would result in population growth; thereby increasing demand on water supplies. The FFTOD Specific Plan would result in a net increase of approximately 42,518 additional people associated with new housing units and 2,734 new jobs associated with new commercial development to the FFTOD Specific Plan Area. The FFTOD Specific Plan Area receives water from the Golden State Water Company (GSWC), which provides water to the Central Basin West service area (GSWC 2019). Water supplied to the Central Basin West service area is composed of groundwater pumped from the Central Groundwater Basin and water from the Colorado River Aqueduct and the State Water Project that is imported and distributed by the Metropolitan Water District of Southern California. GSWC has pumping rights to obtain their groundwater from the Central Groundwater Basin. These pumping rights were established as part of the adjudication of the Central Groundwater Basin in 1965 and amended in 1991. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies that will serve the proposed FFTOD Specific Plan to substantially impact the groundwater aquifer. Therefore, implementation of the FFTOD Specific Plan would result in less-than-significant impacts on the Central Groundwater Basin from groundwater use.

As described above, the Central Basin underlies the FFTOD Specific Plan Area; however, the area is completely developed, and therefore does not have much groundwater recharge potential. Buildout of the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system because of the area's developed condition, and because future development projects would be required to incorporate LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines. The Central Basin is recharged mainly by stormwater, imported water, and reclaimed water along the upper reaches of the San Gabriel River and the Rio Hondo via the San Gabriel River Water Conservation System, which is several miles away from the FFTOD Specific Plan Area. Therefore, the FFTOD Specific Plan would not reduce the groundwater recharge potential of the FFTOD Specific Plan Area. In addition, the depth to groundwater in the vicinity of the FFTOD Specific Plan Area is approximately 160 to 200 feet below ground surface. Therefore, excavation for development in the FFTOD Specific Plan Area would not come into contact with groundwater or require dewatering during excavation activities to an extent that groundwater levels would be adversely affected. Furthermore, because groundwater is not present close to the ground surface, stormwater infiltration BMPs (as described in the County LID Standards Manual) would be technically feasible on site, the use of which could increase the amount of groundwater recharge in the FFTOD Specific Plan Area compared to existing conditions. Therefore, implementation of the FFTOD Specific Plan would result in less-than-significant impacts to the existing recharge capabilities of the area overlying the Central Groundwater Basin.

**HWQ-3:** *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off site?*

### 3.8.4.3 Construction

Construction of future development projects within the FFTOD Specific Plan Area would include excavation and the disturbance of the existing ground surface, thereby exposing bare soil and temporarily altering surface drainage patterns with the potential to cause erosion and siltation. However, construction activities would be required to implement erosion and sediment control BMPs required by the Construction General Permit and MS4 Permit regulations. Compliance with these regulations would ensure that substantial erosion or siltation does not occur on site. These requirements would include the implementation of BMPs as required by the County Pollution Control Requirements for Construction Activities. With implementation of erosion and sediment control BMPs, construction activities associated with future development projects pursuant to implementation of the FFTOD Specific Plan would result in less-than-significant erosion and siltation impacts.

### 3.8.4.4 Operation

Future development within the FFTOD Specific Plan Area would not involve the alteration of a stream or river. Because the area is completely developed, buildout of the FFTOD Specific Plan development is expected to generate little or no increase in runoff to the existing stormwater drainage system. The County LID Standards Manual requires the use of stormwater quality control measures to reduce the potential for erosion and siltation. The measures include the use of retention, biofiltration, vegetation-based, and/or treatment-based stormwater quality measures. Because future development projects would be required to implement the County LID Standards Manual and Green Infrastructure Guidelines, implementation of development within the FFTOD Specific Plan Area would result in a less-than-significant erosion and siltation impact during operations.

**HWQ-4:** *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?*

The majority of the FFTOD Specific Plan Area is built out with urban land uses. Each future development project pursuant to implementation of the FFTOD Specific Plan would be required to have site-specific hydrology and hydraulic studies to determine capacity of the existing storm drain systems and project-specific impacts on such systems prior to approval by the Los Angeles County Public Works. Each future development project would be required to comply with site-specific "allowable discharge rates," as identified by the Los Angeles County Public Works, which limit peak flow discharges compared to existing conditions, thereby minimizing potential for flooding on- or off site.

Future development projects would be constructed and operated in accordance with the Los Angeles County MS4 permit (Order No. R4-2012-0175), which was amended by Order R4-2012-0175-A01. The MS4 permit requires new development and redevelopment projects to retain a specified volume of stormwater runoff from a design storm event on site. The LID Standards Manual provides guidance on how new development and redevelopment projects can meet these on-site retention requirements through stormwater quality control measures. In addition, future development projects that are identified as designated projects are required to implement site design/LID and source control BMPs applicable to their specific designated project categories and treatment control BMPs where necessary. Selection of LID and additional treatment control BMPs is based on the pollutants of concern for the specific project location and the BMP's ability to effectively treat those pollutants.

As such, buildout of the FFTOD Specific Plan would not cause a substantial increase in stormwater runoff and would not result in flooding on- or off site with compliance of the Los Angeles County MS4 permit and site-specific allowable discharge rates. Impacts would be less than significant.

**HWQ-5:** *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner that would create or contribute to runoff water and exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Storm drains within the FFTOD Specific Plan Area currently drain to different portions of Compton Creek. However, as stated previously, buildout of the FFTOD Specific Plan is expected to generate little or no increase in runoff to the existing drainage system because the area is completely developed. Compliance with regulations and implementation of LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines would minimize pollutants being transported off site into downstream receiving waters, which would stabilize and/or even reduce runoff in the area. Impacts related to exceeding the capacity of existing and planned storm drains would be less than significant.

As described under Impact HWQ-1, the FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. However, although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff.

**HWQ-6:** *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described, construction activities associated with the FFTOD Specific Plan would be required to comply with the NPDES permit that would include typical BMPs for erosion control, sediment control, and waste management. Operational activities associated with future development projects of the FFTOD Specific Plan would be required to meet MS4 permit requirements through

compliance with the County LID Standards Manual. In addition, GSWC has pumping rights to obtain their groundwater from the Central Groundwater Basin. These pumping rights were established as part of the adjudication of the Central Groundwater Basin in 1965 and amended in 1991. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies, that will serve the proposed FFTOD Specific Plan, to substantially impact the groundwater aquifer. Therefore, the implementation of the FFTOD Specific Plan would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

## 3.8.5 Programmatic Mitigation Measures

Potential impacts to drainage capacity would be mitigated by implementing the following programmatic mitigation measure:

**MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

## 3.8.6 Level of Significance after Mitigation

Implementation of programmatic mitigation measure MM HYD-1 that would require developers provide a site-specific infrastructure assessment with detailed drainage analysis would ensure sufficient drainage capacity, such that impacts would be reduced to a level that is less than significant.

## 3.8.7 Cumulative Impacts

### 3.8.7.1 Surface Water, Drainage, and Flood Hazards

The geographic scope considered for cumulative impacts to surface water, drainage, and flood hazards is the Los Angeles River watershed. Implementation of cumulative development would be required to comply with all pertinent regulations, such as the Construction General Permit, County Stormwater Pollution Control Requirements for Construction Activities, the County LID Standards Manual, and the MS4 NPDES permit. Compliance with these regulations would require the implementation of BMPs to ensure surface water quality, drainage patters, and flood hazards would not be substantially impacted. Therefore, the project's contribution to cumulative impacts would be less than cumulatively considerable with regulatory compliance and BMP implementation.

### 3.8.7.2 Groundwater

The geographic scope for cumulative impacts related to groundwater impacts includes the approximately 227-square-mile service area of the Central Groundwater Basin. As cumulative development growth occurs within the Central Groundwater Basin, the water purveyors that will serve the future development will use groundwater as well as other water supplies to meet the future demand. However, each water purveyor that has rights to groundwater from the Central Groundwater Basin are limited based on the adjudication that established the pumping rights for each purveyor. Because groundwater withdrawals from the Central Groundwater Basin are limited based on that adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies that will serve cumulative development growth to substantially impact the groundwater aquifer. Therefore, the implementation of cumulative development would result in less-than-significant impacts on the Central Groundwater Basin from groundwater use. As stated previously, groundwater recharge for the Central Groundwater Basin occurs along the upper reaches of the San Gabriel River and the Rio Hondo via the San Gabriel River Water Conservation System. These areas have been established as groundwater recharge areas. Much of the remaining area overlying the Central Groundwater Basin contains impervious surfaces. Therefore, cumulative development would not substantially impact groundwater recharge capabilities within the Central Groundwater Basin. As a result, the implementation of cumulative development would result in less-than-significant impacts to recharge capabilities. Because the FFTOD Specific Plan would result in less-than-significant impacts on the Central Groundwater Basin and the recharge capabilities of the basin, the project's contribution to impacts on the Central Groundwater Basin is less than cumulatively considerable.

### 3.8.7.3 Water Quality

The geographic scope for cumulative impacts related to water quality includes the Los Angeles River watershed. Implementation of cumulative development would be required to comply with all pertinent regulations, such as the Construction NPDES General Permit, County Stormwater Pollution Control Requirements for Construction Activities, and the County LID Standards Manual. Compliance with these regulations would result in the implementation of BMPs to reduce impacts on water quality and potential cumulative impacts on water quality would be less than cumulatively significant. Because the FFTOD Specific Plan would be required to implement the NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the LID Ordinance requirements, the project would minimize its impact on water quality. Therefore, the project's contribution to cumulative water quality impacts would be less than cumulatively considerable.

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# 3.9 LAND USE AND PLANNING

This section evaluates potential impacts to land uses from implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan).

## 3.9.1 Environmental Setting

### *Regional*

The proposed FFTOD Specific Plan Area is in Los Angeles County, which encompasses approximately 4,000 square miles. Approximately 64 percent of Los Angeles County is unincorporated with the majority of this area in the northern portions of the County that includes the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of Los Angeles County consist of many noncontiguous land areas, including Florence-Firestone, which are often referred to as Los Angeles County's unincorporated urban islands.

### *Local*

The FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The FFTOD Specific Plan Area is surrounded on the north, south, and west by the city of Los Angeles and on the east by the city of Huntington Park, the city of South Gate, and the unincorporated community of Walnut Park. The community is between downtown Los Angeles and downtown Long Beach in proximity to major employment centers, including downtown Los Angeles, the ports of Long Beach and Los Angeles, and the industrial sector in southeast Los Angeles County. The area surrounding the FFTOD Specific Plan Area is heavily urbanized with residential, commercial, and industrial land uses. Specifically, the city of Los Angeles land uses surrounding the FFTOD Specific Plan Area to the north, west, and south include commercial, industrial, single-family, and multifamily residential, open space, and public facilities. The city of Huntington Park land uses bordering the FFTOD Specific Plan Area to the east include manufacturing and general commercial. The city of South Gate land uses bordering the FFTOD Specific Plan Area to the east include regional commercial, neighborhood medium residential, and light industrial. The unincorporated community of Walnut Park land uses bordering the FFTOD Specific Plan Area to the east include mixed commercial and general commercial.

Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street. Three freeways (I-110, I-105, I-10) are within a 2.5-mile radius of the community. The existing setting of the FFTOD Specific Plan Area includes three Metro A (Blue) Line Stations that connect the community to major job centers and regional destinations spanning from downtown Los Angeles to Long Beach. In addition, Metro bus routes and Los Angeles Department of Transportation DASH routes serve the area. While multiple public transit options can be found in the community, access to transit is hindered by critical safety barriers for pedestrians and cyclists, including narrow and damaged sidewalks, poor lighting, lack of transit-supportive wayfinding signage, lack of connecting bikeways, and few station access points to the elevated platform (at

the Slauson Station). Land uses near the Metro stations are predominantly industrial, including land dedicated for railroad operations and a large open storage facility adjacent to Slauson Station. This existing land use pattern is a barrier for connecting jobs and housing more closely to the transit services. Current access points to the stations are narrow and difficult to navigate. Bus stops in the station area also lack basic accommodations such as benches, shelters, and sufficient lighting. Cyclists in the area lack safe, separated bicycle facilities and must instead travel in mixed-traffic, high-stress, and dangerous conditions that are not safe for children, elderly, or inexperienced cyclists. One Class II bicycle lane is disconnected to the local and regional bikeway network. Overall, the FFTOD Specific Plan Area is not conducive to facilitating robust transit access and lack the community-serving land uses needed to increase transit use and encourage new transit oriented development.

The FFTOD Specific Plan Area is currently regulated by the Florence-Firestone Community Plan (FFCP) that was updated in 2019 to reflect the associated land use designations from the Los Angeles County 2035 General Plan. Residential uses are the dominant use by land area in the existing FFTOD Specific Plan Area. A summary of existing General Plan Land Use Designations for the FFTOD Specific Plan Area is provided in Table 3.9-1:

**Table 3.9-1: Existing General Plan Land Use Designations in the FFTOD Specific Plan Area**

| General Plan Land Use Designation | Acres | Percentage of FFTOD Specific Plan Area |
|---|---|---|
| Residential 9 (H9, single-family residences) | 46.47 | 2.77% |
| Residential 18 (H18, single-family and two-family residences) | 785.46 | 46.79% |
| Residential 30 (H30, single-family and multi-family residences) | 164.08 | 9.77% |
| General Commercial (CG) | 178.42 | 10.63% |
| Heavy Industrial (IH) | 111.06 | 6.62% |
| Light Industrial (IL) | 108.37 | 6.46% |
| Mixed Use (MU) | 26.08 | 1.55% |
| Parks and Recreation (OS-PR) | 68.78 | 4.10% |
| Public and Semi-Public (P) | 190 | 11.32% |

Source: Florence-Firestone Community Plan (DRP 2019)

Zones for the FFTOD Specific Plan Area are regulated by Los Angeles County Code of Ordinances Title 22; base zones in Division 3 of the code apply, with additional Florence-Firestone Community Standards District (FFCSD) in Division 12 Chapter 22.324 applicable. Residential zones comprise the majority of zones in the proposed FFTOD Specific Plan Area, totaling approximately 61 percent of all land. The largest overall zone, including residential, is the Limited Density Multiple Residence zone (R-3), making up approximately 32 percent of land in the FFTOD Specific Plan Area. A summary of the existing zones for the FFTOD Specific Plan Area is provided in Table 3.9-2:

**Table 3.9-2: Existing Zones**

| Zones | Acres | Percentage of FFTOD Specific Plan Area |
|---|---|---|
| Single-Family Residence (R-1) | 46.47 | 2.77% |
| Two-Family Residence (R-2) | 368.41 | 21.95% |
| Limited Density Multiple Residence (R-3) | 540.69 | 32.21% |
| Medium Density Multiple Residence (R-4) (listed as Unlimited Residential in the FFCP) | 62.58 | 3.73% |
| Residential Planned Development (RPD) | 5.48 | 0.33% |
| Light Agricultural (A-1) | 0.28 | 0.02% |
| Neighborhood Business (C-2) | 33.46 | 1.99% |
| General Commercial (C-3) | 164.53 | 9.80% |
| Unlimited Commercial Development Program (C-3-DP) | 0.18 | 0.01% |
| Commercial Manufacturing (C-M) | 16.07 | 0.96% |
| Institutional (IT) | 86.15 | 5.13% |
| Light Manufacturing (M-1) | 112.17 | 6.68% |
| Restricted Heavy Manufacturing (M-1.5) | 1.33 | 0.08% |
| Restricted Heavy Manufacturing (M-2) | 134.21 | 7.99% |
| Unlimited Manufacturing (M-3) | 6.73 | 0.40% |
| Open Space (O-S) | 99.96 | 5.95% |

Source: Florence-Firestone Community Plan (DRP 2019)

## 3.9.2 Regulatory Setting and Regional/Local Advisory Documents

### State

#### *California Global Warming Solutions Act*

The California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32 and Senate Bill [SB] 535) required a sharp reduction in greenhouse gas (GHG) emissions, reducing to 1990 levels by 2020. AB 32 recognizes that climate change is a threat to the well-being, public health, natural resources, and the environment of California.18 AB 32 is a cap-and-trade program and is one of several strategies that California uses to the reduce GHG emissions that cause climate change. The funds must be used for programs that further reduce GHG emissions. Under the 2012 SB 525 (de Leon), disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program, directing that 25 percent of the proceeds from the GHG reduction fund go to projects that provide a benefit to disadvantaged communities. These investments are aimed at improving public health, quality of life, and economic opportunity in California's most burdened communities while simultaneously reducing the pollution that causes climate change. The legislation gave CalEPA responsibility for identifying those communities and CalEPA released its list of disadvantaged communities for the purpose of SB 535 in April 2017 using CalEnviroScreen 3.0 results. The results included the communities of the unincorporated areas of Los Angeles County. The Green Zones Program is a step taken by Los Angeles County to use land use planning to improve the health and quality of life of its residents while working

toward the goals established by the California Global Warming Solutions Act through reduction of the pollution that causes climate change.

### *California Planning and Zoning Law*

California Planning and Zoning Law requires the legislative body of each county to prepare and adopt a comprehensive, long term general plan for the physical development of the county (Government Code Section 65300-66499.58). Under Government Code Section 65302, each adopted General Plan must include a Land Use Element. The Land Use Element designates the proposed general distribution, location, and extent of the uses of the land for housing, business, industry, open space, education, public buildings and grounds, and other categories of public and private uses of land. Government Code section 65300.5 requires a General Plan to be "integrated and internally consistent and compatible state of policies." In addition, a General Plan must not only be internally consistent but vertically consistent with other land use and development approvals such as specific plans and the agency's zoning and development regulations.

### *Planning for Healthy Communities Act*

The Planning for Healthy Communities Act (SB 1000) is a State environmental justice initiative taken to improve local planning efforts to reduce environmental and health impacts and ensure that communities consider environmental and pollution impacts on local residents. SB 1000 requires cities and counties with disadvantaged communities to address certain health considerations within an environmental justice element or through related goals, policies, and objectives. This includes the communities of the unincorporated areas of Los Angeles County that have been disproportionately impacted by pollution from industrial uses, particularly in communities where zoning and land use patterns resulted in incompatible land uses in close proximity to each other. Therefore, the Green Zones Program has been developed both in alignment with SB 1000 by including relevant policies in the general plan and to develop targeted land use policies and zoning standards that improve the health and quality of life for residents.

### *Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy*

The Southern California Association of Governments (SCAG) develops the Regional Transportation Plan (RTP), which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura counties. SB 375 was enacted to reduce GHG emissions from motor vehicles and light trucks through integrated transportation, land use, housing, and environmental planning. Under the law, SCAG is tasked with developing a Sustainable Communities Strategy (SCS), an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. The SCS outlines the plan for integrating 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 SCS focuses the majority of new housing and job growth in high quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit oriented development. This overall land use development pattern

supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The 2016 RTP/SCS identifies priorities for transportation planning in the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area (SCAG 2016). The Regional Transportation Improvement Programs, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements within the next 5 to 7 years. To qualify for California Environmental Quality Act (CEQA) streamlining benefits under SB 375, a project must be consistent with the RTP/SCS.

The 2020–2045 RTP/SCS, also known as Connect SoCal, is a long-range visioning plan that builds on and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020). The SCAG Regional Council adopted Connect SoCal on September 3, 2020.

## Local

### *Los Angeles County Code of Ordinances – Title 22 Planning and Zoning*

Los Angeles County's Code of Ordinances Title 22 – Planning and Zoning (Zoning Code) regulates all land uses, buildings, structures, and land in the unincorporated area of Los Angeles County based on the designated zoning and land use category. The Zoning Code regulates permitted uses, minimum required areas, maximum height limits, minimum required parking, building setbacks, maximum lot coverage, floor area ratio, and other standards that limit the type and intensity of use for a given zone (see Table III.E-1, Planning and Permitting Requirements). A particular land use in a designated zone may be allowed (i.e., permitted)—pursuant to the requirements of a Conditional Use Permit—if a site plan has been reviewed and approved. Governmental and quasi-governmental agencies may be exempt from portions of Title 22 pursuant to provisions of the California Government Code. Currently the zones and land use designations that permit sensitive uses do not have requirements for remediating the effects of incompatible adjacent uses.

### *Florence-Firestone Community Plan*

The FFCP is a long-range, comprehensive plan for the unincorporated community of Florence-Firestone. The plan is an outgrowth of a visioning process conducted in 2009, which yielded a vision document based on community feedback. The community plan is based on the framework established in the vision plan and includes specific goals, policies, and implementation actions to guide future development and maintenance in the community. The community plan was recommended for approval to the board of supervisors by the Regional Planning Commission on November 15, 2017. The Board of Supervisors held their public hearing on February 27, 2018 and indicated their intent to approve the project. The Board of Supervisors adopted the FFCP on September 3, 2019.

### *Los Angeles County General Plan 2035*

The Los Angeles County General Plan 2035 was adopted by the Board of Supervisors on October 6, 2015 and provides the policy framework for how and where unincorporated Los Angeles County will grow through the year 2035 (DRP 2015). The General Plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in the Los Angeles County and the region. The General Plan includes a Transit Oriented District (TOD) Program (Program LU-2 in Chapter 16 General Plan Implementation Programs) that adds new transit oriented districts and expands existing transit oriented districts from approximately a 0.25-mile radius to 0.5-mile radius from the transit stations. The General Plan states that transit oriented districts are well-suited for higher density housing and mixed uses in urban and suburban areas, with commercial nodes, employment, and civic activities, and identifies the proposed FFTOD Specific Plan Area as a transit oriented district. The objective of the TOD Program is to prepare a TOD Specific Plan for each transit oriented district in Los Angeles County, with goals to: 1) increase walking, bicycling, and transit ridership and reduce vehicle miles traveled (VMTs); 2) facilitate compact, mixed use development; 3) increase economic activity; 4) facilitate the public investment of infrastructure improvements; and 5) streamline the environmental review process for future infill development projects. The General Plan policies related to the FFTOD Specific Plan are listed below.

#### Land Use Element

**Policy LU 1.11**: Require a General Plan amendment for any deviation from the intensities, densities, and uses allowed by the General Plan (to apply the appropriate designation from the General Plan Land Use Legend), unless allowances for flexibility are specified in the specific plan.

**Policy LU 1.12:** Require development regulations and zoning for new specific plans to be consistent with their corresponding General Plan land use designation.

**Policy LU 1.13:** Allow specific plans to include implementation procedures for flexibility, such as development phasing, and redistribution of intensities and uses, as appropriate.

**Policy LU 2.6:** Consider the role of arts and culture in community-based planning efforts to celebrate and enhance community character.

**Policy LU 2.7:** Set priorities for Planning Area-specific issues, including transportation, housing, open space, and public safety as part of community-based planning efforts.

**Policy LU 2.8:** Coordinate with the Los Angeles County Department of Public Works and other infrastructure providers to analyze and assess infrastructure improvements that are necessary for plan implementation.

**Policy LU 2.9:** Use the General Plan Land Use Legend and the Hazard, Environmental and Resource Constraints Model to inform the development of land use policy maps.

**Policy LU 2.10:** Ensure consistency between land use policy and zoning by undergoing a comprehensive zoning consistency analysis that includes zoning map changes and Zoning Code amendments, as needed.

**Policy LU 4.1:** Encourage infill development in urban and suburban areas on vacant, underused, and/or brownfield sites.

**Policy LU 4.2:** Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods.

**Policy LU 4.3:** Encourage transit oriented development in urban and suburban areas with the appropriate residential density along transit corridors and within station areas.

**Policy LU 4.4:** Encourage mixed use development along major commercial corridors in urban and suburban areas.

**Policy LU 5.1:** Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles.

**Policy LU 5.2:** Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs.

**Policy LU 5.3:** Support a mix of land uses that promote bicycling and walking and reduce VMTs.

**Policy LU 5.4:** Encourage community-serving uses, such as early care and education facilities, grocery stores, farmers markets, restaurants, and banks near employment centers.

**Policy LU 5.5:** Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types, and styles.

**Policy LU 5.10:** Encourage employment opportunities and housing to be developed in proximity to one another.

**Policy LU 7.1:** Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques.

**Policy LU 9.2:** Encourage patterns of development that promote physical activity.

**Policy LU 10.3:** Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.

**Policy LU 10.4:** Promote environmentally sensitive and sustainable design.

**Policy LU 10.5:** Encourage the use of distinctive landscaping, signage, and other features to define the unique character of districts, neighborhoods, or communities; encouraging community identity, pride, and interaction.

**Policy LU 10.6:** Encourage pedestrian activity through the following:

- Designing the main entrance of buildings to front the street
- Incorporating landscaping features
- Limiting masonry walls and parking lots along commercial corridors and other public spaces
- Incorporating street furniture, signage, and public events and activities

- Using wayfinding strategies to highlight community points of interest

**Policy LU 10.7:** Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.

**Policy LU 10.8:** Promote public art and cultural amenities that support community values and enhance community context.

**Policy LU 10.10:** Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.

**Policy LU 11.1:** Encourage new development to employ sustainable energy practices, such as using passive solar techniques and/or active solar technologies.

**Policy LU 11.2:** Support the design of developments that provide substantial tree canopy cover and use light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.

**Policy LU 11.3:** Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.

**Policy LU 11.4:** Promote environmentally sensitive and sustainable design.

Mobility Element

**Policy M 1.1:** Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and people with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.

**Policy M 2.1:** Provide transportation corridors/networks that accommodate pedestrians, equestrians, and bicyclists; and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible.

**Policy M 2.2:** Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following street designs, whenever appropriate and feasible:

- Lane width reductions to 10 or 11 feet in low speed environments with a low volume of heavy vehicles
- Wider lanes may still be required for lanes adjacent to the curb and where buses and trucks are expected
- Low-speed designs
- Access management practices developed through a community-driven process
- Back in angle parking at locations that have available roadway width and bike lanes, where appropriate

**Policy M 2.3:** Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following intersection designs, whenever appropriate and feasible:

- Right-angle intersections that reduce intersection skew
- Smaller corner radii to reduce crossing distances and slow turning vehicles
- Traffic calming measures, such as bulb-outs, sharrows, medians, roundabouts, and narrowing or reducing the number of lanes (road diets) on streets
- Crossings at all legs of an intersection
- Shorter crossing distances for pedestrians
- Right-turn channelization islands; sharper angles of slip lanes may also be used.
- Signal progression at speeds that support the target speed of the corridor
- Pedestrian push buttons when pedestrian signals are not automatically recalled
- Walk interval on recall for short crossings
- Left-turn phasing
- Prohibit right turn on red
- Signs to remind drivers to yield to pedestrians

**Policy M 2.4:** Ensure a comfortable walking environment for pedestrians by implementing the following, whenever appropriate and feasible:

- Designs that limit dead-end streets and dead-end sidewalks
- Adequate lighting on pedestrian paths, particularly around building entrances and exits, and transit stops
- Designs for curb ramps that are pedestrian friendly and compliant with the Americans with Disabilities Act (ADA)
- Perpendicular curb ramps where feasible
- Pedestrian walking speed based on the latest standard for signal timing; slower speeds should be used when appropriate (e.g., near senior housing, rehabilitation centers)
- Approved devices to extend the pedestrian clearance times at signalized intersections
- Accessible Pedestrian Signals at signalized intersections
- Pedestrian crossings at signalized intersections without double or triple left or right turn lanes
- Pedestrian signal heads, countdown pedestrian heads, pedestrian phasing, and leading pedestrian intervals at signalized intersections
- Exclusive pedestrian phases (pedestrian scrambles) where turning volume conflicts with very high pedestrian volumes
- Advance stop lines at signalized intersections
- Pedestrian Hybrid Beacons
- Medians or crossing islands to divide long crossings
- High visibility crosswalks
- Pedestrian signage
- Advanced yield lines for uncontrolled crosswalks
- Rectangular Rapid Flashing Beacon or other similar approved technology at locations of high pedestrian traffic
- Safe and convenient crossing locations at transit stations and transit stops at safe intersections

**Policy M 2.5:** Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:

- Bicycle signal heads at intersections
- Bicycle signal detection at all signalized intersections
- Wayfinding signage
- Road diet techniques, such as lane narrowing, lane removal, and parking removal/restriction
- Appropriate lighting on all bikeways, including those in rural areas
- Designs, or other similar features, such as: shoulder bikeways, cycle tracks, contra flow bike lanes, shared use paths, buffered bike lanes, raised bike lanes, and bicycle boulevards

**Policy M 2.6:** Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible.

**Policy M 2.7:** Require sidewalks, trails, and bikeways to accommodate the existing and projected volume of pedestrian, equestrian and bicycle activity, considering both the paved width and the unobstructed width available for walking.

**Policy M 2.8:** Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.

**Policy M 2.9:** Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features.

**Policy M 2.10:** Encourage the provision of amenities, such as benches, shelters, secure bicycle storage, and street furniture, and comfortable, safe waiting areas near transit stops.

**Policy M 4.1:** Expand transportation options that reduce automobile dependence.

**Policy M 4.4:** Ensure expanded mobility and increase transit access for underserved transit users, such as seniors, students, low income households, and people with disabilities.

**Policy M 4.8:** Provide and maintain appropriate signage for streets, roads, and transit.

**Policy M 4.10:** Support the linkage of regional and community-level transportation systems, including multi-modal networks.

**Policy M 5.1:** Facilitate transit oriented land uses and pedestrian-oriented design, particularly in the first/last mile connections to transit, to encourage transit ridership.

**Policy M 5.2:** Implement parking strategies that facilitate transit use and reduce automobile dependence.

**Policy M 6.4:** Minimize noise and other impacts of goods movement, truck traffic, deliveries, and staging in residential and mixed-use neighborhoods.

**Policy M 7.1:** Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.

### Housing Element

**Policy 1.4:** Assist housing developers to identify and consolidate suitable sites for developing housing for low- and moderate-income households and those with special needs.

**Policy 2.1:** Support the development of housing for low- and moderate-income households and those with special needs near employment and transit.

**Policy 2.2:** Encourage mixed use developments along major commercial and transportation corridors.

**Policy 3.1:** Promote mixed income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population.

### Air Quality Element

**Policy AQ 3.5:** Encourage energy conservation in new development and municipal operations.

**Policy AQ 3.6:** Support rooftop solar facilities on new and existing buildings.

Conservation and Natural Resources Element

**Policy C/NR 5.6:** Minimize point and nonpoint source water pollution.

**Policy C/NR 6.1:** Support the Low Impact Development (LID) philosophy, which incorporates distributed, postconstruction parcel-level stormwater infiltration as part of new development.

**Policy C/NR 14.1:** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent practicable.

**Policy C/NR 14.3:** Support the preservation and rehabilitation of historic buildings.

**Policy C/NR 14.6:** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Parks and Recreation Element

**Policy P/R 1.2:** Provide additional active and passive recreation opportunities based on a community's setting, recreational needs, and preferences.

### Noise Element

**Policy N 1.1:** Employ land uses to buffer noise-sensitive uses from sources of adverse noise impacts.

**Policy N 1.2:** Reduce exposure to noise impacts by promoting land use compatibility.

**Policy N 1.3:** Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies.

**Policy N 1.5:** Ensure compliance with the jurisdictions of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise

insulation of new multifamily dwellings constructed within the 60 decibel Community Noise Equivalent Level or Day-Night Average Sound Level noise exposure contours.

**Policy N 1.6:** Ensure cumulative impacts related to noise do not exceed health-based safety margins.

**Policy N 1.9:** Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 A-weighted decibels Community Noise Equivalent Level and above, when unavoidable impacts are identified.

**Policy N 1.11:** Maximize buffer distances and design and orient sensitive receptor structures (e.g., hospitals, residential) to prevent noise and vibration transfer from commercial/light industrial uses.

**Policy N 1.12:** Decisions on land adjacent to transportation facilities (such as the airports, freeways, and other major highways) must consider both existing and future noise levels of these transportation facilities to ensure the compatibility of proposed uses.

### Safety Element

**Policy S 1.1:** Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones.

**Policy S 1.2:** Prohibit the construction of most structures for human occupancy adjacent to active faults until a comprehensive fault study that addresses the potential for fault rupture has been completed.

### Public Services and Facilities Element

**Policy PS/F 1.1:** Discourage development in areas without adequate public services and facilities.

**Policy PS/F 1.2:** Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

**Policy PS/F 2.1:** Support water conservation measures.

**Policy PS/F 8.2:** Support library mitigation fees that adequately address the impacts of new development.

### Economic Development Element

**Policy ED 1.1:** Encourage a diverse mix of industries and services in each Planning Area.

**Policy ED 2.4:** Ensure high standards of development and encourage environmentally sustainable practices in economic development activities.

**Policy ED 2.5:** Encourage employment opportunities in proximity to housing.

**Policy ED 2.6:** Encourage community-serving uses (such as childcare centers and personal services) in proximity to employment centers.

**Policy ED 2.7:** Incentivize economic development and growth along existing transportation corridors and in urbanized areas.

**Policy ED 4.4:** Incentivize infill development in urban and suburban areas that revitalizes underused commercial and industrial areas.

### *Los Angeles County Transit Oriented District Toolkit*

In order to prepare for as many as five additional rail stations throughout unincorporated areas of Los Angeles County as well as additional stations in the future, Los Angeles County developed the Transit Oriented District (TOD) Toolkit (formerly known as TOD Guidelines). The TOD Toolkit provides a framework for a consistent approach to public infrastructure and transportation-related improvements to support land-use decisions in areas within a 0.5-mile radius of the stations.

The TOD Toolkit helps ensure that public infrastructure improvements support land use plans by facilitating both public and private investment in affordable housing and transit-friendly development. It will identify enhancements that the community needs and supports, that market forces, and potential funding mechanisms encourage.

### *OurCounty Sustainability Plan*

OurCounty is a regional sustainability plan for Los Angeles. The plan outlines what local governments and stakeholders can do to enhance the well-being of every community in Los Angeles County while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution. This plan envisions streets and parks that are accessible, safe, and welcoming to everyone; air, water, and soil that are clean and healthy; affordable housing that enables all residents to thrive in place; and a just economy that runs on renewable energy instead of fossil fuels.

### *Los Angeles County Climate Action Plan (in progress)*

The 2020 Community Climate Action Plan describes Los Angeles County's plan to reduce the impacts of climate change by reducing GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. Los Angeles County's existing Community Climate Action Plan document was adopted by the board of supervisors in 2015 as a component of the Los Angeles County General Plan 2035; it expired in 2020 and will be replaced by the Los Angeles County Climate Action Plan (CAP). The Los Angeles County CAP will tie together existing climate change initiatives and provide a blueprint for deep carbon reductions. Through this updated CAP, Los Angeles County is targeting carbon neutrality by 2045 in unincorporated Los Angeles County.

The Los Angeles County CAP will outline actions that Los Angeles County plans to take to reduce GHG emissions and adapt to a changing climate in unincorporated areas. The Los Angeles County CAP will include a GHG inventory and a roadmap for addressing emissions from stationary energy (used by buildings and other facilities), transportation, waste, industrial, agricultural, and land use sectors. Mitigation measures identified in the plan will also yield community co-benefits, including improvements in air quality, public health, mobility, and resilience. The Los Angeles County CAP will be aligned with the General Plan as well as the OurCounty Sustainability Plan to support decision-makers in delivering climate compatible solutions in unincorporated Los Angeles County.

## 3.9.3 Methodology

This section examines the potential for the FFTOD Specific Plan to conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, including relevant policies and regulations in the Los Angeles County General Plan, the Los Angeles County zoning code, and the SCAG RTP/SCS.

### *Thresholds of Significance*

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on land use and planning if it would cause a significant environmental impact due to a conflict with any Los Angeles County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Appendix G significance criteria listed below were scoped out of the analysis for further consideration in the Initial Study (Appendix A) and are described in Chapter 5, Other CEQA Considerations:

- Physically divide an established community
- Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas

## 3.9.4 Environmental Impacts

**LUP-1:** *Would the project 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?*

As described below, the FFTOD Specific Plan Area comprises established roadway and transit networks and an urbanized land use designation pattern. The FFTOD Specific Plan would provide for targeted increases in development capacity that is intended to provide affordable housing, encourage active transportation, and improve access to the Metro A Line Slauson, Florence, and Firestone stations consistent with Los Angeles County policies. The FFTOD Specific Plan includes Guiding Principles and Concepts for each station and that serve as criteria for decision making. The proposed zones in the FFTOD Specific Plan Area along with the proposed Guiding Principles and Concepts are consistent with Los Angeles County policies and ensure land use designation compatibility and minimization of potential environmental impacts as build-out of the FFTOD Specific Plan occurs. The Guiding Principles for the community-wide transit oriented development and development concepts for each station are as follows:

#### Guiding Principles

Guiding Principle 1: Promote pedestrian-friendly, active transit-oriented districts and corridors that support land uses that provide a variety of local services, employment, and housing.

Guiding Principle 2: Increase housing supply near transit that includes a variety of options for residents and families at different income levels.

Guiding Principle 3: Support a green community through enhanced streetscapes, a variety of publicly accessible open spaces, landscaping, and sustainability.

Guiding Principle 4: Encourage placemaking that embraces the vibrant culture of the community.

Guiding Principle 5: Support local jobs and opportunities through a variety of employment-generating uses.

Guiding Principle 6: Improve safety, connectivity, access, and ease of use for all modes of transportation.

Guiding Principle 7: Collaborate to promote equitable outcomes and inclusive economic development.

Guiding Principle 8: Collaborate with other local and regional entities to implement plan objectives efficiently and comprehensively.

### Community-Wide Transit Oriented Development Concepts

- Focus mixed use zoning (mix of services and homes) around Metro stations to activate those areas
- Support the Metro Rail-to-River corridor and future West Santa Ana Branch light rail extension through Slauson Station improvements
- Enhance and expand the public realm through setbacks that expand the sidewalk, pedestrian crossing upgrades, and bicycle facility upgrades
- Blend new development with existing neighborhoods through massing and setback requirements
- Combine improvements in sidewalks, bicycle facilities, and setback conditions to create active transit corridors that make accessing stations easier

### Slauson Station Concept

- Focus the highest densities, to enable more homes, businesses, and services, in walking distance of the Slauson Station
- Enhance pedestrian access with wayfinding and improved street crossings
- Formalize the pathway to the station from 60th Street
- Extend mixed use corridors to Compton Avenue and Homes Avenue to create a connected transit oriented development area around the station

### Florence Station Concept

- Reinforce and enhance the “Florence Mile” as an active mixed-use corridor and central destination for the community
- Blend new homes and services with the neighborhood context
- Improve station access with a new pedestrian bridge and upgraded street crossing

- Scale infill development for a variety of housing options to support family-oriented neighborhoods

### Firestone Station Concept

- Preserve the character and stability of the residential neighborhoods
- Maintain existing neighborhood density while increasing opportunities for accessory dwelling units and duplex housing options
- Allow neighborhood-scaled mixed use along the Firestone and Compton corridors
- Improve pedestrian station access through upgrading of the rail undercrossing

The following discussion demonstrates how the FFTOD Specific Plan would be consistent with the applicable SCAG and General Plan goals and policies that are intended to avoid or mitigate adverse environmental effects. As a result, impacts related to the project's consistency with applicable SCAG and Los Angeles County plans and policies would be less than significant.

### SCAG Policies

As part of 2020-2045 RTP/SCS (Connect SoCal), SCAG prepared the Regional Growth Forecast, which provides a set of socioeconomic projections. Categorized by county and city, the report includes historical data from 2016, and projections of population, housing, and employment for 2045. The socioeconomic estimates and projections in the Growth Forecast are used for federal- and state-mandated long-range planning efforts, such as the RTP, the Air Quality Management Plan, the Regional Transportation Improvement Program, and the Regional Housing Needs Assessment. The estimates also provide guidance to local governments in planning for jobs and housing.

The intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMTs, and streamline the environmental review of future development projects. The socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan Area include higher densities and more growth than is assumed in Connect SoCal (consistent with its goals for focusing higher-density development in transit-rich areas).

Mobility is an important component of sustainability and integrated planning in Connect SoCal. The FFTOD Specific Plan would be consistent with the policy framework and goals of Connect SoCal. The overall goals of Connect SoCal are to:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase people and goods movement and travel choices in the transportation system
5. Reduce GHG emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel

9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMTs, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. Therefore, the FFTOD Specific Plan would be consistent with and would not conflict with SCAG's regional planning goals and policies.

### Los Angeles County General Plan

The FFTOD Specific Plan would involve infill development and redevelopment of underused parcels within walking distance of the existing Metro A Line Slauson, Florence, and Firestone stations. The FFTOD Specific Plan includes rezoning land use designations to introduce additional mixed uses and enhance the transit-oriented development pattern to the area. This is consistent with related General Plan policies provided in Table 3.9-3.

**Table 3.9-3: Consistency of the FFTOD Specific Plan with 2035 General Plan Policies**

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
|---|---|---|
| **Land Use Element** | | |
| LU-1.11 | Require a General Plan amendment for any deviation from the intensities, densities, and uses allowed by the General Plan (to apply the appropriate designation from the General Plan Land Use Legend), unless allowances for flexibility are specified in the specific plan. | Consistent. The proposed FFTOD Specific Plan would require a General Plan amendment to implement specific land use designations so that the community is more consistent with the transit oriented policies in Los Angeles County's General Plan. Therefore, the FFTOD Specific Plan is consistent with this policy. |
| LU-1.12 | Require development regulations and zoning for new specific plans to be consistent with their corresponding General Plan land use designation. | Consistent. The FFTOD Specific Plan would amend the currently designated uses or increase the intensity or density of the on-site designated uses. The FFTOD Specific Plan includes development regulations and proposes new zones to be consistent with the transit oriented policies and land uses in Los Angeles County's General Plan. A General Plan amendment would be required to implement specific land use designations to provide additional consistency with the transit oriented policies in Los Angeles County's General Plan. The proposed FFTOD Specific Plan includes zones and amended General Plan designations so that both are consistent with each other. Therefore, the FFTOD Specific Plan would be consistent with this specific policy. |
| LU-1.13 | Allow specific plans to include implementation procedures for flexibility, such as development phasing, and redistribution of intensities and uses, as appropriate. | Consistent. The FFTOD Specific Plan provides flexibility in density, land use designations, and does not provide a specific phasing timeline. The FFTOD Specific Plan provides a range of uses, development standards, performance standards, and sustainability guidelines that provide the ability for the FFTOD Specific Plan to meet its objectives, while providing flexibility to respond to economic changes and a range of potential development proposals. Therefore, the FFTOD Specific Plan is consistent with this policy. |
| LU-2.6 | Consider the role of arts and culture in community-based planning efforts to celebrate and enhance community character. | Consistent. The FFTOD Specific Plan includes provisions to incorporate public art and murals within the design of public amenities and open spaces, such as the reconstructed pedestrian bridge; and therefore, is consistent with this policy. |
| LU-2.7 | Set priorities for FFTOD Planning Area specific issues, including transportation, housing, open space, and public safety as part of community-based planning efforts. | Consistent. The FFTOD Specific Plan sets housing, transportation, and open space amenities as priority objectives for the project. Therefore, the FFTOD Specific Plan is consistent with this policy. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| LU-2.8 | Coordinate with the Los Angeles County Department of Public Works and other infrastructure providers to analyze and assess infrastructure improvements that are necessary for plan implementation. | Consistent. It was determined, as described in Section 3.16, Utilities and Service Systems, that infrastructure improvements to the existing water system, sewer system, stormwater drainage system, and aboveground electric system could be necessary to accommodate build-out of the FFTOD Specific Plan. The other existing utility infrastructure has the ability to serve build-out of the FFTOD Specific Plan in addition to other existing services. Overall, Los Angeles County has been in coordination with all of the service providers in the Florence-Firestone community; therefore, the project has been implemented in compliance with this policy. |
| LU-2.9 | Use the General Plan Land Use Legend and the Hazard, Environmental and Resource Constraints Model to inform the development of land use policy maps. | Consistent. As described in Section 3.5, Geology and Soils; Section 3.7, Hazards and Hazardous Materials; and Section 3.8, Hydrology and Water Quality; the General Plan information related to land use designations, hazards, constraints, and environmental resources were used in preparation of this EIR analysis and were used in preparing the FFTOD Specific Plan zoning designation maps. |
| LU-2.10 | Ensure consistency between land use policy and zoning by undergoing a comprehensive zoning consistency analysis that includes zoning map changes and Zoning Code amendments, as needed. | Consistent. Preparation of the FFTOD Specific Plan included a comprehensive consistency analysis of existing land use designations, proposing new zones in the area, and general plan amendments to ensure zoning and general plan consistency. |
| LU-4.1 | Encourage infill development in urban and suburban areas on vacant, underused, and/or brownfield sites. | Consistent. The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment of underused and vacant parcels within walking distance of the Slauson, Florence, and Firestone stations. |
| LU-4.2 | Encourage the adaptive reuse of underused structures and the revitalization of older, economically distressed neighborhoods. | Consistent. The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment of underused parcels in the older economically distressed Florence-Firestone community. |
| LU-4.3 | Encourage transit-oriented development in urban and suburban areas with the appropriate residential density along transit corridors and within station areas. | Consistent. The purpose of the FFTOD Specific Plan is to implement transit-oriented infill development and redevelopment within walking distance of the Slauson, Florence, and Firestone stations. |
| LU-4.4 | Encourage mixed use development along major commercial corridors in urban and suburban areas. | Consistent. Implementation of the FFTOD Specific Plan would specifically direct mixed use development along the major corridors in the urban Florence-Firestone community. |
| LU-5.1 | Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types, and styles. | Consistent. Implementation of the FFTOD Specific Plan would accommodate a mix of residential land use designations that range from single-family development to high density multifamily development throughout existing residential and future mixed-use neighborhoods in the Florence-Firestone community. |
| LU-5.2 | Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs. | Consistent. Implementation of the Specific Plan would provide zones for a mix of commercial, retail, and public facilities that would meet both regional needs (such as medical, educational, and Metro uses) and local needs (such as retail and restaurants) for the residents, students, and employees in the FFTOD Specific Plan Area daily. |
| LU-5.3 | Support a mix of land uses that promote bicycling and walking and reduce VMTs. | Consistent. The FFTOD Specific Plan would implement a transit oriented land use designation design that includes pedestrian and bicycle facilities that would connect major land use designations and transportation in the FFTOD Specific Plan Area. Major areas that would be |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| | | connected include: the Rail-to-River Corridor, 60th Street, Compton Avenue, Homes Avenue, the Florence Mile; the Florence and Compton corridors; the Slauson, Florence, and Firestone stations; and the mixed-use neighborhoods. |
| LU-5.4 | Encourage community-serving uses, such as early care and education facilities, grocery stores, farmers markets, restaurants, and banks to locate near employment centers. | Consistent. The FFTOD Specific Plan provides zones to encourage community serving uses including education facilities, medical facilities, and commercial centers to be maintained and expanded upon within the FFTOD Specific Plan Area that provide substantial employment through these same uses. |
| LU-5.5 | Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles. | Consistent. Implementation of the FFTOD Specific Plan would accommodate a mix of residential land use designations that range from single-family development to high density multi-family development throughout existing residential and future mixed-use neighborhoods in the FFTOD Specific Plan Area. |
| LU-5.10 | Encourage employment opportunities and housing to be developed in proximity to one another. | Consistent. The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment of the FFTOD Specific Plan Area to generate a mixed use community, where employment, housing, retail, and multi-modal mobility uses are developed in proximity to one another and to the existing Slauson, Florence, and Firestone stations. |
| LU-7.1 | Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques. | Consistent. The FFTOD Specific Plan includes zoning development standards, founded on the FFCSD overlay, to implement design techniques to ensure that sensitive land use designations such as residential, schools, and hospitals are not adversely impacted by traffic, noise, light, and safety impacts from adjacent uses. |
| LU-9.2 | Encourage patterns of development that promote physical activity. | Consistent. The intent of the FFTOD Specific Plan is to implement a transit oriented development that promotes walking and bicycling between various community uses. The project would implement additional sidewalk pedestrian routes and on-street bicycle routes. Walking and bicycling are physical activities that would be a result of project implementation. |
| LU-10.3 | Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament. | Consistent. The FFTOD Specific Plan includes Land Use Regulations, Zone Standards, and Supplemental Development Standards for each of the land use designations that would be implemented by the project. These regulations and standards include massing, height, materials, styles, setbacks, landscaping, and other features that are considered specifically for each of the environments in the diverse FFTOD Specific Plan Area. |
| LU-10.4 | Promote environmentally sensitive and sustainable design. | Consistent. The FFTOD Specific Plan includes Supplemental Development Standards related to site and building design, solar resources, and water efficiency. |
| LU-10.5 | Encourage the use of distinctive landscaping, signage, and other features to define the unique character of districts, neighborhoods, or communities, and engender community identity, pride, and community interaction. | Consistent. The FFTOD Specific Plan includes Land Use Regulations, Zone Standards, and Supplemental Development Standards for each of the different zones to enhance the definition and unique character of the FFTOD Specific Plan Area. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| LU-10.6 | Encourage pedestrian activity through the following:<br>• Designing the main entrance of buildings to front the street<br>• Incorporating landscaping features<br>• Limiting masonry walls and parking lots along commercial corridors and other public spaces<br>• Incorporating street furniture, signage, and public events and activities<br>• Using wayfinding strategies to highlight community points of interest | Consistent. The intent of the FFTOD Specific Plan is to implement a transit oriented development that promotes walking and pedestrian activity. Consistent with this policy, the project would incorporate pedestrian-oriented circulation infrastructure (such as sidewalks and crossings), landscaping, wayfinding signage, street lighting, and street amenities along pedestrian and bicycle routes. |
| LU-10.7 | Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities. | Consistent. The FFTOD Specific Plan includes opportunities to enhance public space by provision of a pedestrian environment along commercial corridors (see response to Policy 10.6 above) and connections to the Slauson, Florence, and Firestone stations. |
| LU-10.8 | Promote public art and cultural amenities that support community values and enhance community context. | Consistent. The FFTOD Specific Plan includes provisions to incorporate public art and murals in the design of public amenities and open spaces, such as a pedestrian bridge; and therefore is consistent with this policy. |
| LU-10.10 | Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces. | Consistent. The FFTOD Specific Plan includes Land Use Regulations, Zone Standards, and Supplemental Development Standards to identify the various distinctive buildings and focal points of the FFTOD Specific Plan Area. Therefore, the proposed FFTOD Specific Plan is consistent with this policy. |
| LU-11.1 | Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies. | Consistent. The FFTOD Specific Plan includes Supplemental Development Standards related to site and building design, solar resources, and water efficiency. Therefore, the FFTOD Specific Plan is consistent with this policy. |
| LU-11.2 | Support the design of developments that provide substantial tree canopy cover and use light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect. | Consistent. See response to Policy 11.1 above. |
| LU-11.3 | Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques. | Consistent. See response to Policy 11.1, above. |
| LU-11.4 | Promote environmentally sensitive and sustainable design. | Consistent. See response to Policy 11.1, above. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| **Mobility Element** | | |
| M-1.1 | Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible. | Consistent. The FFTOD Specific Plan would implement a transit oriented land use design that includes pedestrian and bicycle facilities that would connect major land uses and transportation within the FFTOD Specific Plan Area. Major areas that would be connected include: the Rail-to-River Corridor, 60th Street, Compton Avenue, Homes Avenue, the Florence Mile; the Florence and Compton corridors; the Slauson, Florence, and Firestone stations; and the mixed-use neighborhoods. The project would implement additional sidewalk pedestrian routes and on-street bicycle routes. Development of all new facilities would be ADA accessible as required by federal and state law. |
| M-2.1 | Provide transportation corridors/networks that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible. | Consistent. As described under response to Policy 1.1 above, the FFTOD Specific Plan would implement a transit oriented land use design that includes pedestrian and bicycle facilities that would connect major land uses, such as: the Rail-to-River Corridor, 60th Street, Compton Avenue, Homes Avenue, the Florence Mile; the Florence and Compton corridors; the Slauson, Florence, and Firestone stations; and the mixed-use neighborhoods. The project would implement additional sidewalk pedestrian routes and on-street bicycle routes. The proposed pedestrian and bicycle facilities would be designed to specifically accommodate the unique urban uses in the FFTOD Specific Plan Area. |
| M-2.2 | Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following street designs, whenever appropriate and feasible:<br>• Lane width reductions to 10 or 11 feet in low-speed environments with a low volume of heavy vehicles<br>• Wider lanes may still be required for lanes adjacent to the curb, and where buses and trucks are expected<br>• Low-speed designs<br>• Access management practices developed through a community-driven process<br>• Back-in angled parking at locations with adequate roadway width and bike lanes, where appropriate | Consistent. The FFTOD Specific Plan provides appropriate accommodations for pedestrian and bicycle facilities by developing sidewalk and intersection improvements and bicycle routes, including adding Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street, and implementing complete street strategies with traffic calming measures. The FFTOD Specific Plan includes various accommodations to improve pedestrian and bicycle facilities and comply with the Los Angeles County 2012 Bicycle Master Plan. |
| M-2.3 | Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following intersection designs, whenever appropriate and feasible:<br>• Right-angle intersections that reduce intersection skew<br>• Smaller corner radii to reduce crossing distances and slow turning vehicles | Consistent. The FFTOD Specific Plan provides accommodations for pedestrian and bicycle facilities by developing sidewalks and bicycle routes and implementing various traffic calming streetscape and crosswalk designs. These design improvements include Class IV bicycle lanes, sidewalk restriping, curb ramps, Pedestrian Hybrid Beacons, mid-block crosswalks, curb extensions, speed bumps, raised crosswalks, traffic circles, and roundabouts. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| | • Traffic calming measures, such as bulb-outs, sharrows, medians, roundabouts, and narrowing or reducing the number of lanes (road diets) on streets<br>• Crossings at all legs of an intersection<br>• Shorter crossing distances for pedestrians<br>• Right-turn channelization islands. Sharper angles of slip lanes may also be used<br>• Signal progression at speeds that support the target speed of the corridor<br>• Pedestrian push buttons when pedestrian signals are not automatically recalled<br>• Walk interval on recall for short crossings<br>• Left-turn phasing<br>• Prohibit right turn on red<br>• Signs to remind drivers to yield to pedestrians | |
| M-2.4 | Ensure a comfortable walking environment for pedestrians by implementing the following, whenever appropriate and feasible:<br>• Designs that limit dead-end streets and dead-end sidewalks<br>• Adequate lighting on pedestrian paths, particularly around building entrances and exits, and transit stops<br>• Designs for curb ramps, which are pedestrian friendly and ADA compliant<br>• Perpendicular curb ramps at locations where it is feasible<br>• Pedestrian walking speed based on the latest standard for signal timing. Slower speeds should be used when appropriate (e.g., near senior housing, rehabilitation centers)<br>• Approved devices to extend the pedestrian clearance times at signalized intersections<br>• Accessible Pedestrian Signals at signalized intersections<br>• Pedestrian crossings at signalized intersections without double or triple left or right turn lanes | Consistent. The FFTOD Specific Plan, as described above provides accommodations to ensure a comfortable pedestrian environment by developing sidewalks that connect various uses within the area and would be compliant with all Los Angeles County regulations, including lighting, ADA access, and Department of Traffic and Lighting design guidelines. The specific intersection design improvements that are proposed include: 1) adding/restriping high visibility crosswalks at existing marked crossings; 2) adding curb ramps and truncated domes at existing marked crossings; 3) adding pedestrian hybrid beacons or rectangular rapid flashing beacons at existing marked mid-block crossings; and 4) adding high visibility crosswalks at unmarked crossings at intersections and at new mid-block crossing locations. The implementation of these proposed intersection design improvements would result in the project being consistent with this policy. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| | • Pedestrian signal heads, countdown pedestrian heads, pedestrian phasing and leading pedestrian intervals at signalized intersections<br>• Exclusive pedestrian phases (pedestrian scrambles) where turning volume conflicts with very high pedestrian volumes<br>• Advance stop lines at signalized intersections<br>• Pedestrian Hybrid Beacons<br>• Medians or crossing islands to divide long crossings<br>• High-visibility crosswalks<br>• Pedestrian signage<br>• Advanced yield lines for uncontrolled crosswalks<br>• Rectangular Rapid Flashing Beacon or other similar approved technology at locations of high pedestrian traffic<br>• Safe and convenient crossing locations at transit stations and transit stops located at safe intersections | |
| M-2.5 | Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:<br>• Bicycle signal heads at intersections<br>• Bicycle signal detection at all signalized intersections<br>• Wayfinding signage<br>• Road diet techniques, such as lane narrowing, lane removal, and parking removal/restriction<br>• Appropriate lighting on all bikeways, including those in rural areas<br>• Designs, or other similar features, such as shoulder bikeways, cycle tracks, contra flow bike lanes, shared use paths, buffered bike lanes, raised bike lanes, and bicycle boulevards | Consistent. The FFTOD Specific Plan provides accommodations for bicycling by providing Class IV protected bicycle facilities on Compton Avenue, Florence Avenue, and Nadeau Street, implementing traffic calming measures, and providing wayfinding signage. |
| M-2.6 | Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible. | Consistent. The intent of the FFTOD Specific Plan is to implement a transit-oriented development that promotes walking and bicycling between various community uses. The project would implement additional sidewalk pedestrian routes and Class IV protected bicycle routes. Therefore, the project would promote active transportation. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| M-2.7 | Require sidewalks, trails, and bikeways to accommodate the existing and projected volume of pedestrian, equestrian, and bicycle activity, considering both the paved width and the unobstructed width available for walking. | Consistent. The proposed bikeways and pedestrian paths would be developed to accommodate the projected volume of use. A network of pedestrian and bicycle paths and improvements are proposed in the FFTOD Specific Plan Area. The pedestrian improvements such as sidewalks and improvements at intersections will accommodate future pedestrian activity. The bicycle improvements include the implementation of Class IV protected bike paths that consist physical separation from motor traffic using a vertical feature, designated for the exclusive use of bicycles. The separation may include grade separation, flexible posts, inflexible barriers, or on-street parking. These proposed improvements would accommodate future increases in pedestrian and bicycle activity in the FFTOD Specific Plan Area. |
| M-2.8 | Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations. | Consistent. The FFTOD Specific Plan includes pedestrian and bicycle facilities that would connect major land uses and transportation in the FFTOD Specific Plan Area. Major areas that would be connected include: the Rail-to-River Corridor, 60th Street, Compton Avenue, Homes Avenue, the Florence Mile; the Florence and Compton corridors; the Slauson, Florence, and Firestone stations; and the mixed-use neighborhoods. |
| M-2.9 | Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features. | Consistent. The FFTOD Specific Plan would implement streetscape improvements that consist of street trees, street furniture, street lighting, signage, landscaping, and public art. |
| M-2.10 | Encourage the provision of amenities, such as benches, shelters, secure bicycle storage, and street furniture, and comfortable, safe waiting areas near transit stops. | Consistent. The FFTOD Specific Plan would include street furniture, street lighting, signage, landscaping, and bicycle lock up facilities. |
| M-4.1 | Expand transportation options that reduce automobile dependence. | Consistent. The FFTOD Specific Plan would expand transportation options that reduce automobile dependence by implementing a transit oriented land use design that includes pedestrian and bicycle facilities that would connect major land uses and transportation in the FFTOD Specific Plan Area. |
| M-4.4 | Ensure expanded mobility and increase transit access for underserved transit users, such as seniors, students, low income households, and people with disabilities. | Consistent. The FFTOD Specific Plan would expand mobility and increase transit access for underserved transit users by implementing a transit oriented land use design that would connect major land uses to the Slauson, Florence, and Firestone stations by pedestrian and bicycle facilities. Development of all new facilities would be ADA compliant as required by federal and state law. |
| M-4.8 | Provide and maintain appropriate signage for streets, roads, and transit. | Consistent. The FFTOD Specific Plan would implement a wayfinding signage program that would help people orient themselves in the physical space and navigate from destination to destination by use of signage, markers, and/or monuments. |
| M-4.10 | Support the linkage of regional and community-level transportation systems, including multimodal networks. | Consistent. The FFTOD Specific Plan would link the regional and community-level transportation systems by maintaining roadways and parking facilities and providing pedestrian and bicycle facilities that connect to the regional Metro system. |
| M-5.1 | Facilitate transit oriented land uses and pedestrian oriented design, particularly in the first/last mile connections to transit, to encourage transit ridership. | Consistent. The intent of the FFTOD Specific Plan is to implement a transit oriented development that promotes walking and bicycling between various community uses and the Slauson, Florence, and Firestone stations. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| M-5.2 | Implement parking strategies that facilitate transit use and reduce automobile dependence. | Consistent. The FFTOD Specific Plan includes sufficient parking to ensure the economic viability and success of the community, to provide parking in convenient locations to users, and to efficiently manage parking in a manner that supports a walkable and pedestrian-friendly environment. Considering the unique context of the Florence-Firestone community, which includes an older housing stock that may have fewer parking spaces per unit, a higher number of people per unit than Los Angeles County average, and concerns about rising cost of living that may induce displacement in the community, the FFTOD Specific Plan recommends a comprehensive parking study as the most immediate implementation action. Some initial ideas that will be explored further in the comprehensive parking study include in-lieu parking fees for projects having difficulty meeting parking requirements, flexible parking standards to set upper and lower limits, Los Angeles County-managed off-street parking structures and lots, on-street flex zones, electric vehicle carshare parking, and parking sensor technology. The implementation of these design strategies would facilitate transit use and reduce automobile dependence while addressing the needs of the Florence-Firestone community. |
| M-6.4 | Minimize noise and other impacts of goods movement, truck traffic, deliveries, and staging in residential and mixed-use neighborhoods. | Consistent. The FFTOD Specific Plan includes Supplemental Development Standards to implement design techniques to ensure that residential uses are not adversely impacted by traffic or noise impacts from adjacent nonresidential uses. |
| M-7.1 | Minimize roadway runoff through the use of permeable surface materials and other low impact designs, wherever feasible. | Consistent. The FFTOD Specific Plan includes numerous potential opportunities to minimize roadway stormwater runoff. Any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain will be required to prepare a site-specific infrastructure assessment that will be used to determine whether drainage improvements or upgrades would be required as part of the development project. The FFTOD Specific Plan would meet green infrastructure and LID requirements for stormwater control by implementing retention-based stormwater quality control measures (e.g., bioretention, infiltration basin, dry well, permeable pavement), biofiltration, and vegetation-based stormwater quality control measures (e.g., stormwater planter [or planter box], vegetated swale, green roof), as well as the LID requirements that include demonstrating that site improvements do not introduce new flooding concerns upstream or downstream from the project, submitting LID and/or Storm Water Pollution Prevention Plans, as required by the NPDES thresholds, to preservation of water quality and mitigation of environmental impacts, and incorporating best management practices, as appropriate to the project and parcel, consistent with the LID Manual and Green Infrastructure Guidelines. Overall, the FFTOD Specific Plan would be consistent with this policy. |
| **Housing Element** | | |
| Policy 1.4 | Assist housing developers to identify and consolidate suitable sites for developing housing for low- and moderate-income households and those with special needs. | Consistent. The FFTOD Specific Plan identifies underused and vacant parcels in the FFTOD Plan Area and provides the planning structure to consolidate and redevelop sites to provide infill development that would consist of various residential dwelling types for low- and moderate-income households. The location of the development would be within proximate |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
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| | | distance to existing bus routes and the Slauson, Florence, and Firestone stations to assist people with disabilities. |
| Policy 2.1 | Support the development of housing for low- and moderate-income households and those with special needs near employment and transit. | Consistent. Implementation of the FFTOD Specific Plan would accommodate a mix of residential land use designations that range from single-family development to high density multifamily development near the community's commercial corridors and the existing Slauson, Florence, and Firestone stations. |
| Policy 2.2 | Encourage mixed use developments along major commercial and transportation corridors. | Consistent. Implementation of the FFTOD Specific Plan would specifically direct mixed-use development along the major corridors in the urban Florence-Firestone community. |
| Policy 3.1 | Promote mixed income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population. | Consistent. Implementation of the FFTOD Specific Plan would accommodate a mix of residential land use designations that range from single-family development to high density multifamily development throughout existing residential and future mixed-use neighborhoods in the Florence-Firestone community. |
| **Air Quality Element** | | |
| AQ-3.5 | Encourage energy conservation in new development and municipal operations. | Consistent. The FFTOD Specific Plan includes Supplemental Development Standards related to site and building design, solar resources, and water efficiency. |
| AQ-3.6 | Support rooftop solar facilities on new and existing buildings. | Consistent. The FFTOD Specific Plan includes Supplemental Development Standards that support inclusion of solar facilities in new development. |
| **Conservation and Natural Resources Element** | | |
| C/NR-5.6 | Minimize point and nonpoint source water pollution. | Consistent. As described in Section 3.8, Hydrology and Water Quality, development projects that would be implemented by the FFTOD Specific Plan would be required to implement NPDES required Storm Water Pollution Prevention Plans during construction and LID designs in compliance with RWQCB and Los Angeles County's LID Standards during operations to minimize sources of water pollution. |
| C/NR 6.1 | Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development. | Consistent. As described in Section 3.8, Hydrology and Water Quality, development projects that would be implemented by the proposed FFTOD Specific Plan would be required to implement LID designs in compliance with RWQCB and Los Angeles County's LID Standards. |
| C/NR 14.1 | Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible. | Consistent. As described in Section 3.3, Cultural Resources, mitigation measures are included to reduce potential impacts to historic, cultural, and paleontological resources to the greatest extent feasible. |
| C/NR 14.3 | Support the preservation and rehabilitation of historic buildings. | Consistent. As described in Section 3.3, Cultural Resources, the Mitigation Measure CUL-1 would support preservation of historic buildings by requiring a historical resources assessment performed by an architectural historian or historian meeting SOI's Professional Qualification Standards; as well as requires SOI Standards for Treatments and/or recordation if needed. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
|---|---|---|
| C/NR 14.6 | Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources. | Consistent. Mitigation measures described in Section 3.3, Cultural Resources, require proper notification and recovery processes in areas that could contain historic, cultural, and paleontological resources. |
| **Parks and Recreation Element** | | |
| P/R-1.2 | Provide additional active and passive recreation opportunities based on a community's setting, and recreational needs and preferences. | Consistent. The FFTOD Specific Plan Area is urban and developed with existing uses that do not provide substantial opportunity for additional recreation. However, the FFTOD Specific Plan includes an opportunity to develop publicly accessible open space, such as pocket parks and plazas to serve the community. The FFTOD Specific Plan would meet required common and private open space and therefore, the FFTOD Specific Plan would be consistent with this policy. |
| **Noise Element** | | |
| N-1.1 | Employ land uses to buffer noise-sensitive uses from sources of adverse noise impacts. | Consistent. The FFTOD Specific Plan includes zoning regulations to implement design techniques to ensure that residential uses are not adversely impacted by noise. |
| N-1.2 | Reduce exposure to noise impacts by promoting land use compatibility. | Consistent. See response above to Policy 1.1. |
| N-1.3 | Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through best available technologies. | Consistent. See response above to Policy 1.1. |
| N-1.5 | Ensure compliance with the jurisdictions of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise insulation of new multifamily dwellings constructed within the 60 dB (CNEL or Ldn) noise exposure contours. | Consistent. Implementation of the FFTOD Specific Plan would be required to implement new development consistent with all regulations including the State Noise Insulation Standards. |
| N-1.6 | Ensure cumulative impacts related to noise do not exceed health-based safety margins. | [Consistent. As described in Section 3.10, Noise, the FFTOD Specific Plan would result in less than significant cumulative impacts related to noise. |
| N-1.9 | Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 dBA CNEL and above, when unavoidable impacts are identified. | Consistent. The FFTOD Specific Plan includes zoning regulations to implement design techniques to ensure that residential uses are not adversely impacted by noise from adjacent nonresidential uses. |
| N-1.11 | Maximize buffer distances and design and orient sensitive receptor structures (e.g., hospitals, residential) to prevent noise and vibration transfer from commercial/light industrial uses. | Consistent. The FFTOD Specific Plan includes zoning regulations to implement design techniques to ensure that residential uses are not adversely impacted by traffic, noise, light, and safety impacts from adjacent nonresidential uses. |
| N-1.12 | Decisions on land adjacent to transportation facilities, such as the airports, freeways and other major highways, must consider both existing and future noise levels of these | Consistent. The FFTOD Specific Plan includes zoning regulations to implement design techniques to ensure that residential uses are not adversely impacted by noise from adjacent nonresidential uses. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
|---|---|---|
| | transportation facilities to assure the compatibility of proposed uses. | |
| **Safety Element** | | |
| S-1.1 | Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones. | Consistent. The FFTOD Specific Plan Area is not within or adjacent to an Alquist-Priolo Fault Zone. The closest known fault is the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area. |
| S-1.2 | Prohibit the construction of most structures for human occupancy adjacent to active faults until a comprehensive fault study that addresses the potential for fault rupture has been completed. | Consistent. See response to Policy 1.1 above, the project would not result in construction of structures within a fault zone. |
| **Public Services and Facilities Element** | | |
| PS/F-1.1 | Discourage development in areas without adequate public services and facilities. | Consistent. As described in Section 3.12, Public Services, the new land uses that would be implemented by the FFTOD Specific Plan would be served by adequate public services, including fire services, police services, school services, and library services. Therefore, the project would not result in developments without adequate public services or facilities. |
| PS/F-1.2 | Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms. | Consistent. See response to Policy 1.1. |
| PS/F-2.1 | Support water conservation measures. | Consistent. The proposed FFTOD Specific Plan includes Sustainable Supplemental Development Standards related to site and building design for water efficiency. In addition, projects implemented under the FFTOD Specific Plan would be required to meet all CALGreen and Title 24 water conservation requirements. |
| PS/F-8.2 | Support library mitigation fees that adequately address the impacts of new development. | Consistent. The development that would occur per the FFTOD Specific Plan would be required to pay all development impact fees, including library mitigation fees, as described in Section 3.12, Public Services. |
| **Economic Development Element** | | |
| ED-1.1 | Encourage a diverse mix of industries and services in each Planning Area. | Consistent. The purpose of the proposed FFTOD Specific Plan is to implement infill development and redevelopment of the project area to generate a mixed-use community, providing diverse industries that include retail, housing, medical, educational, office, and related support industries. |
| ED-2.4 | Ensure high standards of development and encourage environmentally sustainable practices in economic development activities. | Consistent. The FFTOD Specific Plan includes Land Use Regulations, Zone Standards, and Supplemental Development Standards for each of the land use designations that would be implemented by the project. These regulations and standards include massing, height, materials, styles, setbacks, landscaping, and other features that are considered specifically for each of the environments within the community, which would ensure high standards of development. |

| Policy Number | Policy Text | Statement of Consistency or Nonconsistency |
|---|---|---|
| ED-2.5 | Encourage employment opportunities in proximity to housing. | Consistent. The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment of the project area to generate a mixed use community, where employment, medical, housing, retail, and educational uses are developed in proximity to one another and to the existing Slauson, Florence, and Firestone stations. |
| ED-2.6 | Encourage community-serving uses, such as childcare centers and personal services, in proximity to employment centers. | Consistent. The FFTOD Specific Plan provides zoning to encourage community serving uses in proximity to employment centers and regional transit. |
| ED-2.7 | Incentivize economic development and growth along existing transportation corridors and in urbanized areas. | Consistent. The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment along corridors within the economically distressed Florence-Firestone community to incentivize economic development. |
| ED-4.4 | Incentivize infill development in urban and suburban areas that revitalizes underused commercial and industrial areas. | Consistent. The purpose of the FFTOD Specific Plan is to implement infill development and redevelopment of underutilized and vacant parcels within walking distance of the Slauson, Florence, and Firestone stations. |

Notes:
ADA = Americans with Disabilities Act
CalGreen = California Green Building Standards Code
CNEL = Community Noise Equivalent Level
dB = decibel
dBA = A-weighted decibel
FFCSD = Florence-Firestone Community Standards District
Ldn = day-night average sound level
LID = Low Impact Development
NPDES = National Pollutant Discharge Elimination System
RWQCB = Regional Water Quality Control Board
SOI = Secretary of the Interior
VMT = vehicle mile traveled

The FFTOD Specific Plan was developed in compliance with requirements of Government Code Sections 65450-65457 and outlines the regulatory, design, implementation, financing, and infrastructure framework to leverage transit investments in the Florence-Firestone Community. Per California State law, Specific Plans must be internally consistent with the jurisdiction's General Plan. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan; broader TOD and sustainability goals of Los Angeles County; and the FFCP. Note that adoption of the FFTOD Specific Plan would result in concurrent amendments to:

A. The Los Angeles County General Plan to update the land use designations of parcels to support TOD policies, apply newly adopted land use designations for mixed use development, and maintaining consistency between the General Plan and the Specific Plan

B. The FFCP to:

    1) Update the land use designations of the identified properties and references to the FFCSD
    2) Correct a few zones and/or associated zone names to be consistent with the Zoning Code classifications of Title 22. Specifically, zone C-2 would be renamed from "Neighborhood Business" to "Neighborhood Commercial." In addition, zone "R-3-()U – Limited Density Multiple Residence" would be changed to "R-3 – Limited Density Multiple Residence" and "R-4-()U – Medium Density Multiple Residence" would be changed to "R-4 – Medium Density Multiple Residence." The proposed minor revisions to the FFCP will merely make an editorial correction to reflect the correct zoning designation and/or the associated zone name. It would not change the pattern, types, or density of land uses that are currently allowed under the Zoning Code.
    3) Add a limited set of new policies that increase the TOD direction and support the Specific Plan.

C. The Los Angeles County Code, Title 22 to:

    1) Amend the Zoning Map to change zones of identified parcels to be consistent with the Specific Plan; these zone changes encourage a mix of transit-oriented development and land uses that would, in part, provide more opportunities for affordable housing and a greater mix of housing options and employment opportunities.
    2) Repeal Chapter 22.324 Florence-Firestone Community Standards District; the FFCSD would be replaced by the standards set forth in the FFTOD Specific Plan.
    3) Adopt the zoning provisions of the proposed Specific Plan (Chapter 4, Florence-Firestone Zones and Development Standards) into a new section within Title 22 Chapter 22.420.

Overall, impacts of the FFTOD Specific Plan related to conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

## 3.9.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.9.6 Level of Significance after Mitigation

Impacts would be less than significant. No programmatic mitigation measures are required.

## 3.9.7 Cumulative Impacts

The cumulative study area for land use and planning includes all areas within the Florence-Firestone community and the areas (such as the city of Los Angeles, city of Lynwood, and city of Compton areas) that are adjacent to the FFTOD Specific Plan Area. Future growth in the vicinity of the FFTOD Specific Plan Area is anticipated to be similar in character and intensity as existing development and proposed land uses under the FFTOD Specific Plan. It is reasonable to assume that as future developments in the vicinity would be processed through Los Angeles County and adjacent incorporated cities, these projects would be consistent with the policies in the applicable general plans or if policy revisions or general plan amendments are proposed, these potential changes and revisions would be reviewed to ensure potential environmental impacts would be less than significant. Therefore, cumulative developments would result in less than significant environmental impacts associated with consistency to the county's and surrounding cities' general plans and policies.

As stated previously, the FFTOD Specific Plan would be consistent with the vision and policies of the County General Plan policies as well as with relevant SCAG RTP/SCS policies. As a result, the project's contribution to cumulative impacts associated with consistency to existing general plans and policies would not be cumulatively considerable, and therefore, less than cumulatively significant.

## 3.9.8 References

Los Angeles County Department of Regional Planning (DRP). 2015. General Plan 2035, available at: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf, accessed on: April 19, 2021.

DRP. 2019. Florence-Firestone Community Plan, available at: https://planning.lacounty.gov/assets/upl/project/ffcp_final_20190903.pdf#page=46, accessed on: March 22, 2021.

Southern California Association of Governments (SCAG). 2016. Regional Transportation Plan 2016- 2040/Sustainable Communities Strategy, available at: https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557, accessed on: June 3, 2021.

Southern California Association of Governments. 2020. 2020- 2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), available at: https://scag.ca.gov/read-plan-adopted-final-plan, accessed on: June 3, 2021.

# 3.10 NOISE

This section addresses the potential impacts of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) as it relates to noise and vibration. Criteria used to evaluate noise impacts were obtained from the Noise Element of Los Angeles County's General Plan and the Los Angeles County Code (LACC) Noise Control Ordinance. The assessment of impacts relies on future traffic volumes on major roadways and their relative effect on future noise levels in the FFTOD Specific Plan Area by using data provided by Fehr & Peers (Appendix E).

## 3.10.1 Environmental Setting

The FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west. The city of Huntington Park, the city of South Gate, and the unincorporated community of Walnut Park are to the east of the FFTOD Specific Plan Area. The LA Metro A Line (previously LA Metro Blue Line), which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations) and numerous bus routes run through and within the community. Three freeways (I-110, I-105, I-10) are within a 2.5-mile radius of the community.

### 3.10.1.1 Existing Noise Sources

Sources of noise in the FFTOD Specific Plan Area are typical of those found in other urban developed areas such as vehicular traffic, construction work, commercial operations, landscaping, recreational activities, emergency vehicle sirens, rail operations, and aircraft overflights. The existing noise environment in the FFTOD Specific Plan area is dominated by transportation-related noise sources including vehicular traffic on the local roadway network, the operation of LA Metro passenger trains running through the general center of the FFTOD Specific Plan Area in a north-to-south orientation, and the below-grade operation of freight rail along the eastern edge of the FFTOD Specific Plan Area. The key roadway facilities serving the FFTOD Specific Plan Area are the four major arterials that are responsible for the movement of most personal, commercial, freight, and transit vehicles: Slauson Avenue, Florence Avenue, Firestone Boulevard, and Compton Avenue; as well as the following other roadways:

- Bandera Street
- Bell Avenue
- Clovis Avenue
- Crockett Boulevard
- East 92nd Street
- East 96th Street
- East 97th Street
- East 103rd Street
- East Century Boulevard
- East Gage Avenue
- Elm Street

- Holmes Avenue
- Hooper Avenue
- Maie Avenue
- Nadeau Street
- South Alameda Street
- South Central Avenue
- Santa Fe Avenue
- Tweedy Boulevard
- Walnut Drive
- Wilmington Avenue

Florence-Firestone is primarily composed of single- and multifamily residential neighborhoods. Commercial activity is concentrated along major transportation routes with clusters of industrial uses along the Alameda Corridor (DRP 2019). The major corridors in the FFTOD Specific Plan Area are characterized by low-scale commercial and industrial uses on small lots. Although the Compton Avenue corridor has been designated as commercial, a variety of single-family detached homes and multifamily residential properties remain fronting the corridor and increase in frequency south of Florence Avenue. The Slauson Avenue corridor is characterized by a variety of commercial properties including general commercial, automobile repair and maintenance, and retail and restaurants, as well as industrial. The Florence Avenue corridor is characterized by a variety of commercial uses in a range of small to medium parcel sizes.

The LA Metro A (Blue) Line, which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). In 2019, the Slauson Station had an average daily ridership of 1,850; Florence Station had an average daily ridership of approximately 2,342, and Firestone Station had an average daily ridership of 3,214 (DRP 2020).

Transit service is present throughout the FFTOD Specific Plan Area. There are ten LA Metro bus lines that serve the study area (lines 53, 55, 60, 102, 108, 110, 111, 115, 251, 611). Changes due to LA Metro's NextGen Bus Plan will increase service frequency on the several routes with the highest ridership which includes FFTOD Specific Plan Area lines 108 (along Slauson Avenue). All other routes will see no change or reduced service. Lines 254 and 612 were discontinued in December 2020 due to low ridership, while line 751 was merged with line 251. In addition to LA Metro service, the Los Angeles County Public Works provides looping shuttle service through the study area via The Link – Florence-Firestone/Walnut Park route, which operates on 60-minute headways.

### 3.10.1.2 Noise-Sensitive Receptors

The FFTOD Specific Plan Area contains a range of potentially noise-sensitive land uses. Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically conducted at a receptor location and, as a result, noise standards vary based on the relative sensitivity of each land use. The LACC Noise Control ordinance defines noise-sensitive zones as those having residential or semi-residential/commercial land uses, as well as zones designated by the Director of Los Angeles County's Department of Health Services, provided that conspicuous signs are displayed near the institution or facility in the zones. The

primary noise-sensitive land uses in the FFTOD Specific Plan Area include single- and multifamily residences, several K-12 schools, and parks.

Noise-sensitive receptors exist throughout the FFTOD Specific Plan Area with some immediately adjacent to or fronting major transportation corridors. Noise-sensitive receptors exist as close as approximately 75 feet from LA Metro A (Blue) Line stations, approximately 70 feet from LA Metro A Line tracks, and approximately 180 feet from the below-grade freight rail corridor.

### 3.10.1.3 Noise Principles and Descriptors

Noise is typically regarded as unwanted or disruptive sound. Whether something is perceived as a noise event is influenced by the type of sound, the perceived importance of the sound, and its appropriateness in the setting, the time of day, and the type of activity during which the noise occurs and the sensitivity of the listener. The amplitude of sound is measured in decibels (dB), using a logarithmic scale. A sound level of zero dB is approximately the threshold of human hearing, normal conversational speech has a sound level of approximately 60-65 dB, and sound levels above approximately 110 dB begin to be felt inside the human ear as discomfort and eventually as pain at 120 dB and higher. A scale of decibels alongside common indoor and outdoor noise sources is provided in Table 3.10-1. The minimum change in the sound level of individual events that an average human ear can detect is about 1 to 2 dB. A 3 dB change is barely audible and a 5 dB change is readily perceived. A change in sound level of about 10 dB is perceived by the average person as a doubling (or if decreasing by 10 dB, halving) of the sound's loudness.

Most sounds one hears in the environment do not consist of a single frequency but are composed of a broad band of frequencies differing in sound level. The method commonly used to quantify environmental sounds consists of evaluating all frequencies of a sound according to a weighting system that reflects the typical frequency-dependent sensitivity of average healthy human hearing at moderate sound levels. This is called "A-weighting," and the decibel level measured is referred to as A-weighted decibels (dBA). The A-weighting scale deemphasizes low-frequency and very-high-frequency content to reflect the average human ear's lack of sensitivity in those particular bands.

In addition to noise levels at a given moment, the duration and averaging of noise over time is also important for the assessment of potential noise disturbance. Noise levels varying over time are averaged over a period of time, usually, hour(s), expressed as an energy-equivalent sound level (Leq). For example, a Leq (3h) value would represent the equivalent sound level energy from fluctuating sound levels measured throughout a 3-hour period. When no period is specified, a 1-hour average is assumed (Leq [1h] or Leq).

**Table 3.10-1: Representative Noise Sources and Corresponding Noise Levels**

| Common Outdoor Activities | Noise Level (dBA) | Common Indoor Activities |
|---|---|---|
| | 110 | Rock Band |
| Jet Flyover at 1,000 Feet | | |
| | 100 | |
| Gas Lawn Mower at 3 Feet | | |
| | 90 | |
| Diesel Truck at 50 Feet at 50 mph | | Food Blender at 3 Feet |
| | 80 | Garbage Disposal at 3 Feet |
| Noisy Urban Area, Daytime | | |
| Gas Lawn Mower at 100 Feet | 70 | Vacuum Cleaner at 10 Feet |
| Commercial Area | | Normal Speech at 3 Feet |
| Heavy Traffic at 300 Feet | 60 | |
| | | Large Business Office |
| Quiet Urban Daytime | 50 | Dishwasher in Next Room |
| Quiet Urban Nighttime | 40 | Theater, Large Conference Room (Background) |
| Quiet Suburban Nighttime | | |
| | 30 | Library |
| Quiet Rural Nighttime | | Bedroom at Night, Concert Hall (Background) |
| | 20 | |
| | | Broadcasting/Recording Studio |
| | 10 | |
| | 0 | |

Notes:
dBA = A-weighted decibels
Source: Caltrans 2013

The time of day of noise is also an important factor to consider when assessing potential community noise impacts, as noise levels that may be acceptable during the daytime hours may create disturbance during evening or nighttime hours, when people are typically at home and sleeping. The Community Noise Equivalent Level (CNEL) is a descriptor used to characterize average noise levels over a 24-hour period, calculated from hourly Leq values, with 5 dBA added to the hourly Leq levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dBA added to the hourly Leq levels occurring between 10:00 p.m. and 7:00 a.m., to reflect the greater disturbance potential from evening and nighttime noise, respectively. The day/night average sound level (Ldn) is the same as the CNEL, except the evening period is included in the daytime period is folded into the daytime period.

## Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects of environmental noise refer to those effects that interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

Overall, there is no completely satisfactory way to measure the subjective effects of noise or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to changes in A-weighted noise level, the following relationships generally occur:

- A change in noise levels of 1 dBA cannot be perceived
- A change in noise levels of 3 dBA change in noise levels is considered to be a barely perceivable difference
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference
- A change in noise levels of 10 dBA is subjectively perceived as doubling of loudness

These relationships occur in part because of the logarithmic nature of sound and the decibel system. The human ear perceives sound in a nonlinear fashion; hence the decibel scale was developed. Because the decibel scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA.

## Noise Attenuation

From the source to the receiver, noise changes both in level and frequency spectrum. The most obvious change is the decrease in noise as the distance from the source increases. The manner in

which noise reduces with distance depends on the following important factors: ground absorption, atmospheric effects and refraction, shielding by natural and human-made features, noise barriers, diffraction, and reflection. For a point or stationary noise source, such as construction equipment, the attenuation or drop-off in noise level would be at least -6 dBA for each doubling of unobstructed distance between source and the receiver and could attenuate to 7.5 dBA depending on the acoustic characteristics of the intervening ground. For a linear noise source, such as vehicles traveling on a roadway, the attenuation or drop-off in noise level would be approximately -3 dBA for each doubling of unobstructed distance between source and the receiver and could attenuate to -4.5 dBA depending on the acoustic characteristics of the intervening ground.

A large object in the path between a noise source and a receiver can significantly attenuate noise levels at that receiver. The amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, as well as human-made features, such as buildings and walls, can significantly alter noise levels. Walls or berms are often specifically used to reduce, or attenuate, noise.

## Fundamentals of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Ground-borne vibration propagates from the source through the ground to adjacent buildings by surface waves, having a frequency measured in cycles per second (Hz). Most environmental vibrations consist of a composite of many frequencies and generally are classified as broadband or random vibrations. The normal frequency range of most ground-borne vibration that can be perceived generally ranges between 1 and 200 Hz.

Vibration energy dissipates geometrically as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. Soil properties also affect the propagation of vibration, with stiffer soils, clays, and rock strata enabling more efficient transmission of vibrational energy. On interaction with a building foundation, usually, a ground-to-foundation coupling loss occurs; however, the transmitted vibration also can be amplified by structural conditions of the walls and floors, allowing resonance. Vibration in buildings typically is perceived as the rattling of windows or items on shelves, or the motion of building surfaces. At sufficiently high levels and depending on the loudness of the background airborne noise level, the vibration of interior building surfaces can be heard as a low-frequency rumbling sound, also known as ground-borne noise.

The peak particle velocity (PPV) and root mean square (RMS) velocity normally are described in inches per second (in/s). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is the metric often used to describe blasting vibration and other vibration sources that may result in structural stresses in buildings (FTA 2018).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response to ground vibrations. The human body takes some time to respond to vibration signals; therefore, average vibration amplitude (i.e., the RMS velocity) is the most appropriate descriptor for gauging human response to the typical ground vibration. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over 1 second. As with airborne sound, the RMS velocity often is expressed in dB notation as vibration decibels

(VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018). This VdB scale is based on a reference value of 1 micro-inch per second. The background vibration-velocity level typical of residential areas is approximately 50 VdB (FTA 2018).

According to Federal Transit Administration (FTA) guidance (FTA 2018), ground-borne vibration normally is perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels.

## 3.10.2 Regulatory Setting

Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies. Local regulation of noise involves implementation of general plan policies and noise ordinance standards. Local general plans identify general principles intended to guide and influence development plans; local noise ordinances establish standards and procedures for addressing specific noise sources and activities. A discussion of the relevant regulatory setting and noise regulations, plans, and policies is provided below.

### Federal

#### *Noise Control Act*

The Noise Control Act of 1972 directed the Environmental Protection Agency to develop noise level guidelines that would protect the population from the adverse effects of environmental noise. Subsequently, the agency published the "Levels Document" (EPA 1974) that contained recommendations for 55 dBA Ldn at the exterior and 45 dBA Ldn for the interior of noise-sensitive receivers, such as residences. The U.S. Department of Housing and Urban Development standards define Ldn levels below 65 dBA outdoors as acceptable for residential use. The Federal Highway Administration (FHWA), the Federal Interagency Committee on Urban Noise, and the Federal Aviation Administration also have developed standards and guidance.

#### *Occupational Safety and Health Act*

Onsite occupational noise exposure levels set by the Occupational Safety and Health Act of 1970 are regulated by the Occupational Safety and Health Administration and in California by the California Occupational Safety and Health Administration. The maximum time-weighted average noise exposure level of workers is 90 dBA, over an 8-hour work shift, and 115 dBA for periods of 15 minutes or less (29 Code of Federal Regulations section 1910.95).

### State

#### *California Department of Health Services Noise Standards*

The California Department of Health Services has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are provided in Table 3.10-2. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare

and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: 1) identify and appraise noise problems in the community; 2) recognize Office of Noise Control guidelines; and 3) analyze and quantify current and projected noise levels.

**Table 3.10-2: Community Noise Exposure (Ldn or CNEL)**

| Land Use | Normally Acceptable[a] | Conditionally Acceptable[b] | Normally Unacceptable[c] | Clearly Unacceptable[d] |
|---|---|---|---|---|
| Residential - Low Density Single- family, Duplex, Mobile Homes | 55 - 60 | 55 - 70 | 70 - 75 | 75 |
| Residential - Multi-Family Homes | 55 - 65 | 60 - 70 | 70 - 75 | 75 |
| Transient Lodging – Motels, Hotels | 55 - 65 | 60 - 70 | 70 - 80 | 75 |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | 55 - 70 | 60 - 70 | 70 - 80 | 80 |
| Auditoriums, Concert Halls, Amphitheaters | --- | 55 - 70 | --- | 65 |
| Sports Arena, Outdoor Spectator Sports | --- | 55 - 75 | --- | 70 |
| Playgrounds, Neighborhood Parks | 55 - 70 | --- | 67 - 75 | 72 |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | 55 - 75 | --- | 70 - 80 | 80 |
| Office Buildings, Business Commercial and Professional | 55 - 70 | 67 - 77 | 75 | --- |
| Industrial, Manufacturing, Utilities, Agriculture | 55 - 75 | 70 - 80 | 75 | --- |

Notes:
CNEL = Community Noise Equivalent Level
Ldn = day/night average sound level
[a] Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.
Source: Office of Planning and Research 2003

The State of California also establishes noise limits for vehicles licensed to operate on public roads. For heavy trucks, the State pass-by standard is consistent with the federal limit of 80 dB. The state pass-by standard for light trucks and passenger cars (less than 4.5 tons, gross vehicle rating) is also 80 dBA at approximately 50 feet (15 meters) from the centerline. These standards are implemented through controls on vehicle manufacturers and by legal sanction of vehicle operators by state and local law enforcement officials. The state has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise.

These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of Regulations). The noise insulation standards set forth an interior standard of 45 dBA (Ldn or CNEL) in any habitable room. They require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to noise levels greater than 60 dBA Ldn/CNEL. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

### *California Department of Transportation's Transportation- and Construction-Vibration Guidance Manual*

The California Department of Transportation's (Caltrans) Transportation and Construction Vibration Guidance Manual (Caltrans 2020) provides guidance for the analysis of vibratory impacts generated by transportation and construction projects, stating the thresholds for structural damage and human perception/annoyance. A curated list of damage and annoyance thresholds from the Caltrans manual, as applicable to various receiver and vibratory source types, is provided in Table 3.10-3.

**Table 3.10-3: Maximum Vibration Levels for Construction Equipment for Potential Damage and Annoyance**

| Structure Type | Potential Damage Thresholds (PPV in/sec) | | "Strongly Perceptible" Annoyance Criteria (PPV in/sec) | |
|---|---|---|---|---|
| | Transient Sources | Continuous/Frequent Intermittent Sources | Transient Sources | Continuous/Frequent Intermittent Sources |
| Historic and some old buildings | 0.5 | 0.25 | 0.9 | 0.1 |
| Older residential structures | 0.5 | 0.3 | | |
| New residential structures | 1.0 | 0.5 | | |
| Modern industrial and commercial buildings | 2.0 | 0.5 | | |

Notes:
Transient sources generate a single vibratory event, such as blasting.
Continuous/frequent sources include pile driving equipment and other construction activities generating multiple vibration-intensive events across a given period.
PPV in/sec = peak particle velocity is indicated in inches per second
Source: Caltrans 2020

As provided in Table 3.10-3, vibratory activities have the potential to result in structural damage when vibration levels exceed 0.25 to 2 PPV in/sec, as applicable to the source type and receiver characterization, and the potential for human annoyance when vibration levels exceed 0.1 to 0.9 PPV in/sec, as applicable to the source type.

## Local

### *Los Angeles County General Plan, Noise Element*

The overall purpose of the noise element of a general plan is to protect people from the harmful and annoying effects of exposure to excessive noise. The Noise Element in the Los Angeles County General Plan focuses on noise issues associated with transportation, including airports, highways, and railroads. The Noise Element quantifies the community noise environment by establishing noise exposure contours for both near- and long-term levels of growth and noise-generating activity. This information guides development of goals and policies to achieve noise-compatible land uses, and identifies baseline noise levels and sources to help local noise ordinance enforcement. The Los Angeles County General Plan Environmental Impact Report (EIR) identified noise compatibility at noise-sensitive exterior areas as exceeding 65 dBA CNEL and noise compatibility for interior habitable noise-sensitive areas as exceeding 45 dBA CNEL (Los

Angeles County 2015a). General land use-noise compatibility noise levels for Los Angeles County are provided in Table 3.10-4 (Los Angeles County 2015a). These general noise levels for Los Angeles County are categorized as Normally Acceptable, Conditionally Acceptable, Normally Unacceptable, and Clearly Unacceptable.

**Table 3.10-4: Community Noise Exposure (Ldn or CNEL)**

| Land Use | Normally Acceptable[a] | Conditionally Acceptable[b] | Normally Unacceptable[c] | Clearly Unacceptable[d] |
|---|---|---|---|---|
| Residential - Low Density Single- family, Duplex, Mobile Homes | 55 - 60 | 55 - 70 | 70 - 75 | 75 |
| Residential - Multi-Family Homes | 55 - 65 | 60 - 65 | 70 - 75 | 75 |
| Transient Lodging – Motels, Hotels | 55 - 65 | 60 - 65 | 70 - 75 | 80 |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | 55 - 70 | 60 - 65 | 70 - 75 | 80 |
| Auditoriums, Concert Halls, Amphitheaters | --- | 55 - 70 | --- | 65 |
| Sports Arena, Outdoor Spectator Sports | --- | 55 - 75 | --- | 70 |
| Playgrounds, Neighborhood Parks | 55 - 70 | --- | 70 - 75 | 75 |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | 55 - 75 | --- | 70 - 75 | 80 |
| Office Buildings, Businesses, Commercial and Professional | 55 - 70 | 70 - 75 | 75 | --- |
| Industrial, Manufacturing, Utilities, Agriculture | 55 - 75 | 70 - 80 | 75 | --- |

Notes:
CNEL = Community Noise Equivalent Level
Ldn = day/night average sound level
[a] Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.
Source: Los Angeles County 2015a

### *Los Angeles County Code*

In addition to regulating noise through implementation of the policies of general plan noise elements, local jurisdictions regulate noise through enforcement of local noise standards. These standards generally relate to noisy activities (e.g., construction) and stationary noise sources and facilities (e.g., heating, ventilation, and air conditioning [HVAC] units and industrial activities). Generally, federal and state laws preempt local agencies from establishing noise standards for transportation-related noise sources, such as aircraft, ships, trains, and motor vehicles.

The LACC outlines exterior noise standards for four noise zones based on land use type: noise-sensitive areas, residential properties, commercial properties, and industrial properties (Los Angeles County 2017). Los Angeles County's maximum exterior noise standards set forth in LACC Section 12.08.390 are provided in Table 3.10-5. For residential-zoned areas, the presumed

ambient noise level is 50 dBA during the daytime and 45 dBA during the nighttime. The following standards are used to evaluate compliance:

- Standard No. 1: Exterior noise cannot exceed levels provided in Table 3.10-5 for a cumulative period of more than 30 minutes in any hour.
- Standard No. 2: Exterior noise cannot exceed levels provided in Table 3.10-5 plus 5 dBA for a cumulative period of more than 15 minutes in any hour.
- Standard No. 3: Exterior noise cannot exceed levels provided in Table 3.10-5 plus 10 dBA for a cumulative period of more than 5 minutes in any hour.
- Standard No. 4: Exterior noise cannot exceed levels provided in Table 3.10-5 plus 15 dBA for a cumulative period of more than one minute in any hour.
- Standard No. 5: Exterior noise cannot exceed levels provided in Table 3.10-5 plus 20 dBA at any time.

**Table 3.10-5: Los Angeles County Exterior Noise Standard (By Zone)**

| Noise Zone | Zone | Daytime Hours (7 a.m. to 10 p.m.) dBA ($L_{eq}$) | Nighttime Hours (10 p.m. to 7 a.m.) dBA ($L_{eq}$) |
|---|---|---|---|
| I | Noise-sensitive area | 45 | 45 |
| II | Residential | 50 | 45 |
| III | Commercial | 60 | 55 |
| IV | Industrial | 70 | 70 |

Source: LACC, Section 12.08.390.

If ambient noise levels exceed the exterior noise levels in Table 3.10-5, then the aforementioned standards can be adjusted by substituting relevant noise levels in Table 3.10-5 with the following ambient measurements:

- Standard No. 6: Ambient L50, the noise level exceeded 50% of the time over an hour period.
- Standard No. 7: Ambient L25, the noise level exceeded 25% of the time over an hour period.
- Standard No. 8: Ambient L8.3, the noise level exceeded 8.3% of the time over an hour period.
- Standard No. 9: Ambient L1.7, the noise level exceeded 1.7% of the time over an hour period.
- Standard No. 10: Ambient L0, the maximum noise level over an hour period.

LACC Section 12.08.440 prohibits construction between the hours of 7:00 p.m. and 7:00 a.m. and at any time on Sundays or holidays, given that it creates a noise disturbance across a residential or commercial real property line. The maximum noise levels permissible by construction equipment at affected buildings depending on land use are provided in Table 3.10-6. These noise thresholds pertain to two timeframes: daytime hours from 7:00 a.m. to 8:00 p.m. daily (except Sundays and holidays) and nighttime hours from 8:00 p.m. to 7:00 a.m. daily (or all day Sundays and holidays).

**Table 3.10-6: Los Angeles County Noise Restrictions on Construction Equipment at Receptor**

| Equipment Type | Receptor Type | Daytime Hours | Nighttime Hours |
|---|---|---|---|
| Mobile Short-term operation (less than 10 days) | Single-family Residential | 75 | 60 |
| | Multi-family Residential | 80 | 64 |
| | Semi-residential/Commercial | 85 | 70 |
| | Business Structures | 85 | 85 |
| Stationary Long-term operation (more than 10 days) | Single-family Residential | 60 | 50 |
| | Multi-family Residential | 65 | 55 |
| | Semi-residential/Commercial | 70 | 60 |

Source: LACC, Section 12.08.440.

The Los Angeles County Noise Ordinance states that noise levels caused by any air-conditioning or refrigeration equipment shall not exceed the levels provided in Table 3.10-7, Los Angeles County Noise Restrictions on Residential Air Conditioning and Refrigeration Equipment.

**Table 3.10-7: Los Angeles County Noise Restrictions on Residential Air Conditioning and Refrigeration Equipment**

| Measurement Location | Units Installed Before 1-1-80 dBA | Units Installed On or After 1-1-80 dBA |
|---|---|---|
| Any point on neighboring property line, 5 feet above grade level, no closer than 3 feet from any wall. | 60 | 55 |
| Center of neighboring patio, 5 feet above grade level, no closer than 3 feet from any wall. | 55 | 50 |
| Outside the neighboring living area window nearest the equipment location, not more than 3 feet from the window opening, but at least 3 feet from any other surface. | 55 | 50 |

Source: LACC, Section 12.08.530.

## 3.10.3 Methodology

Implementation of the FFTOD Specific Plan could result in the introduction of noise sources with the potential to exceed allowable Los Angeles County noise levels. The primary sources of noise associated with the FFTOD Specific Plan would be construction activities and project-related traffic generated by the proposed residential and nonresidential land uses. Secondary sources of noise would include new stationary sources (such as HVAC units) associated with the proposed land use developments. The generation of noise by these activities and other noise sources associated with the FFTOD Specific Plan Area have been either quantitatively or qualitatively assessed and compared to the applicable noise standards and thresholds of significance.

In addition to noise levels, groundborne vibration would also be generated during the construction of the new developments occurring throughout the FFTOD Specific Plan Area by various construction-related activities and equipment. Therefore, the groundborne vibration levels generated by these sources have been quantitatively estimated and compared to relevant thresholds.

### Construction Noise Levels

Construction noise levels were estimated using data published by the FHWA Roadway Construction Noise Model and the FTA Guidance for General Assessment of construction noise. These noise levels are then analyzed against the construction noise standards established in the LACC to determine whether an exceedance of allowable noise levels could occur across any adjacent property boundaries.

### Roadway Noise Levels

Due to the limited changes in traffic volumes, period-of-day flows, and mix of vehicle classifications (e.g., cars, medium trucks, heavy trucks), roadway noise levels were qualitatively assessed based on arithmetic differences in these categories. Traffic data including traffic volumes and classification mix per period-of-day was generated specifically for this assessment by Fehr & Peers (see Appendix E of this Draft EIR). The roadway segments selected for analysis are expected to be most directly impacted by project-related traffic.

A comparison of future without project and future with project traffic data was conducted and assessed using standard acoustic principles for relative changes in noise levels, allowing for a quantitative assessment of project-generated traffic noise contribution.

### Groundborne Vibration Associated with Project Construction

Groundborne vibration levels resulting from construction activities occurring in the FFTOD Specific Plan Area were estimated based on data published by the Caltrans Transportation and Construction Vibration Guidance Manual (2020). The potential vibration levels at off-site vibration-sensitive uses resulting from implementation of the proposed Specific Plan are analyzed against the vibration thresholds for human annoyance and structural damage established by Caltrans to determine whether an exceedance of allowable vibration levels would occur.

### Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have a significant impact related to noise if it would:

- 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
- Generation of excessive groundborne vibration or groundborne noise levels.

The thresholds listed below were scoped out of the analysis in the Initial Study (Appendix A) and are only described in Chapter 5, Other CEQA Considerations:

- For a project in the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?

### Noise Criteria

For the purpose of determining whether the implementation of the FFTOD Specific Plan would result in the exposure of persons to or generate noise levels that would exceed established noise

standards, construction and stationary operational noise levels associated with the project would be assessed as a significant impact if Los Angeles County's construction noise regulations are violated and/or operational noise standards are exceeded.

The CEQA Guidelines do not define the levels at which permanent and temporary increases in ambient noise are considered "substantial." Therefore, with regards to traffic noise, the significance of the FFTOD Specific Plan traffic noise impacts can be determined by comparing relative changes in traffic volumes, vehicle mixes, and traffic volume spreads across a typical day between future without-project and future with-project scenarios. With respect to the community noise environment, the average healthy ear can barely perceive a noise level change of 3 dBA, and a change up to 5 dBA may be readily perceptible. A 10 dBA change would be perceived as an apparent doubling in loudness. For the purpose of the FFTOD Specific Plan traffic noise impact assessment, it is assumed that a significant permanent increase in roadway noise levels would occur if project-related traffic increases the ambient noise environment by 3 dB or greater.

### Vibration Criteria

The CEQA Guidelines also do not define the levels at which groundborne vibration or groundborne noises are considered "excessive." The thresholds for vibration impacts causing human annoyance and structural damage were obtained from the Caltrans Transportation and Construction Vibration Guidance Manual identified in Table 3.10.3 above, ranging between 0.1 and 2.0 PPV in/sec depending on the receiver type and the character of the construction performed.

In consideration of typical construction types in the FFTOD Specific Plan Area and the assuming construction activities would fall within Caltrans' "Continuous/Frequent Intermittent Source" classification, the project would result in significant vibratory effects if it generates levels in excess of 0.1 PPV in/sec at vibration-sensitive land uses and levels in excess of 0.3 PPV inch/sec at any adjacent nonproject structure. If newer buildings abut the construction site, a vibration level limit of 0.5 PPV inch/sec is appropriate.

The siting and planning of new residential land use in proximity to the existing light rail and freight rail corridors should consider the FTA's recommended screening distances for vibration assessments of 100 feet and 200 feet, respectively.

## 3.10.4 Environmental Impacts

**NOI-1:** *Would the project result in the 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?*

The intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce vehicle miles traveled, and streamline the environmental review of future development projects. It would encourage infill development with pedestrian-friendly and community-serving uses near transit stops. It would enable additional development of mixed-use, commercial, and residential land uses and provide mobility improvements that support increased housing density

and employment in proximity to the three LA Metro A (Blue) Line Stations in the community (Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit oriented district development pattern.

Total buildout of the FFTOD Specific Plan is projected to result in 25,532 total dwelling units, a population of 100,423 (a 3.9 population to housing ratio), and total employment of 11,408 people in the FFTOD Specific Plan Area in 2035; this translates to a net increase of 12,110 new dwelling units, 42,518 more people, and 2,734 new jobs over existing conditions.

## Construction

Site-specific development in the FFTOD Specific Plan Area would be market-driven such that future development projects would occur in response to the existing and future needs of the residential and commercial markets over the approximate 15-year buildout period. As such, it is expected that construction activities would occur intermittently throughout the 15-year buildout period of the FFTOD Specific Plan. Construction noise impacts associated with each new future development project would be short-term in nature and limited to the period of time when construction activity is taking place for that particular development. Development would generally involve construction phases such as demolition, grading/excavation, paving, and building construction.

Construction, although typically short-term, can be a substantial source of noise depending on scope of activities. Construction noise is most significant when it takes place near noise-sensitive land uses, during nighttime hours, or involves noise-intensive activities such as impact pile driving. The construction activity noise levels at and near-future development project sites within the FFTOD Specific Plan Area would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment. Generally, each new residential, commercial, or mixed-use development would require the use of both heavy construction equipment and the use of smaller power tools, generators, and other sources of noise.

During each phase of construction for any future development project, there would be a different mix of equipment operating, and the noise levels generated during the phase would vary based on the type and quantity of equipment in operation and the relative distance of activities from noise-sensitive properties.

A list of equipment types anticipated to operate during typical construction activities along with their reference maximum sound level at a distance of 50 feet is provided in Table 3.10-8. Lmax values provided herein are generally based on a combination of the Federal Highway Administration Roadway Construction Noise Model (RCNM) User's Guide (2006).

**Table 3.10-8: Typical Noise Levels from Construction Equipment**

| Construction Equipment | Noise Level (dBA, Leq at 50 feet) |
|---|---|
| Air Compressor | 74 |
| Backhoe | 74 |
| Compactor | 76 |
| Concrete Mixer | 75 |
| Concrete Pump | 74 |
| Crane (Mobile) | 73 |
| Dozer | 78 |
| Grader | 81 |
| Jack Hammer | 82 |
| Loader | 75 |
| Paver | 74 |
| Pile-Driver | 94 |
| Scraper | 80 |
| Flatbed Truck | 70 |

Notes:
dBA = A-weighted decibels
Leq values are based on representative equipment from RCNM ("Actual Measured Lmax") and applicable usage factors per type of equipment. For equipment not covered by this reference, Lmax values were sourced from RCNM Spec 721.560 and/or the FTA Manual.
Source: FHWA 2006

The construction activities for each new site-specific future development project that would occur in the FFTOD Specific Plan Area would expose nearby existing uses to increased noise levels. Because the FFTOD Specific Plan would increase densities in the Specific Plan Area, construction of new developments could be located less than 50 feet from a sensitive receptor, such as existing residential units. Consequently, construction that occurs immediately adjacent to these existing receptors would generate noise levels that would be substantially greater than the existing noise levels at these receptor locations. Based on the specific construction equipment provided in Table 3.10-8, construction noise levels at adjacent receptors could reach between 70 and 94 dBA, Leq, or greater when noise-sensitive receptors are within 50 feet of construction activities. It should be noted, however, that it's very unlikely that these noise levels would be generated continuously for any whole day.

Section 12.08.440 of the LACC has established numerical standards to regulate construction noise levels at buildings with specific land uses as provided in Table 3.10-6. In addition, Section 12.08.440 of the LACC limits construction activities in Los Angeles County to occur between the hours of 7:00 a.m. to 7:00 p.m. on weekdays (including Saturdays) and prohibits construction activities on Sundays and holidays. Construction activities may occur outside of these hours if Los Angeles County determines that the emergency maintenance, repair, or improvement of public service utilities is needed, or if a variance is issued by the health officer.

All future development projects in the FFTOD Specific Plan Area would require an approved permit and be subject to these regulations. Because construction activities are required to comply with the regulations in the LACC, the construction activities associated with future developments

in the FFTOD Specific Plan Area would not exceed any standards established in the LACC. Therefore, construction impacts would be less than significant.

## Operations

### *Exterior Noise Standards*

With respect to nonvehicular operational noise levels, Los Angeles County has established exterior noise standards that are correlated with land use zoning classifications, which are provided in Table 3.10-5. The standards aim to prohibit unnecessary, excessive, and annoying noises from all sources, as certain noise levels are detrimental to the health and welfare of individuals.

Future development projects pursuant to implementation of the FFTOD Specific Plan may contribute noise to the existing ambient noise environment adjacent to existing noise-sensitive uses. However, the noise environment in a high-density, urban, walkable transit-oriented environment is anticipated to be louder than other areas in the existing Florence-Firestone community that are less dense. Noise sources from future development projects have the potential to expose existing noise-sensitive land uses to noise levels that exceed Los Angeles County's exterior noise limits for residential uses (50 dBA during the daytime and 45 dBA at night) and commercial uses (60 dBA during the daytime and 55 dBA at night). Additionally, residential air condition and refrigeration equipment would need to meet the various limits provided in Table 3.10-7. However, through implementation of a specific environmental review and development permit processes, future development projects in the FFTOD Specific Plan Area would be considered and reviewed on a case-by-case basis to determine whether operational noise levels generated by an individual development have potential to result in an exceedance of Los Angeles County's noise standards, including careful review of HVAC unit location(s) and associated noise effects. Development permits are provided pursuant to an applicant's compliance with the LACC related to noise and are necessary to reduce potential noise impacts. With implementation of existing County noise regulations, noise impacts on land uses in the FFTOD Specific Plan Area from operation of future developments would be less than significant.

### *Roadway Noise*

To evaluate the future traffic noise environment in the FFTOD Specific Plan Area, the future traffic noise levels on the roadways located within the Specific Plan area were estimated based on future traffic volumes (future with- and without-project data) provided by Fehr & Peers. A total of 157 roadway segments were analyzed for changes to traffic volumes, vehicle mix, and period-of-day traffic flows; all of which could have an effect on the future traffic noise levels.

Traffic data provided by Fehr & Peers suggested that both vehicle mix and period-of-day traffic flows would not change by a statistically significant factor between the without-project and with-project scenarios. Vehicle classification mixes fluctuated by up to 1% between the scenarios (e.g., a 1% increase in heavy truck traffic on select segments), and period-of-day traffic distributions also changed by up to 1% (e.g., 1% more traffic during nighttime hours).

Certain roadways did experience noteworthy increases in overall traffic volumes or average daily traffic under the with-project scenario. A summary of the highest project-generated traffic noise contribution along any of the studied segments for each of the 25 studied roadways is provided in Table 3.10-9.

**Table 3.10-9: Predicted Project-Generated Maximum Traffic Noise Level Increase per Studied Roadway**

| Roadway Name | Predicted Project-Generated Contribution to Future Traffic Noise Level (dBA, CNEL) |
|---|---|
| Bandera Street | 0.3 |
| Bell Avenue | 0.1 |
| Clovis Avenue | 0.1 |
| Compton Avenue | 0.6 |
| Crockett Boulevard | 0.0 |
| E 103rd Street | 0.1 |
| E 92nd Street | 0.3 |
| E 96th Street | 0.0 |
| E 97th Street | 0.1 |
| E Century Boulevard | 0.0 |
| E Florence Avenue | 0.3 |
| E Gage Avenue | 0.4 |
| E Slauson Avenue | 0.2 |
| Elm Street | 0.0 |
| Firestone Boulevard | 0.2 |
| Holmes Avenue | 0.2 |
| Hooper Avenue | 0.6 |
| Maie Avenue | 0.7 |
| Nadeau Street | 0.6 |
| S Alameda Street | 0.1 |
| S Central Avenue | 0.1 |
| Santa Fe Avenue | 0.0 |
| Tweedy Boulevard | 0.1 |
| Walnut Drive | 0.2 |
| Wilmington Avenue | 0.2 |

Notes:
dBA = A-weighted decibels
CNEL = Community Noise Equivalent Level

As provided in Table 3.10-9, the project will generate an imperceptible increase in traffic noise of less than 1 dBA at every studied roadway segment.

### *Railway Noise*

The LA Metro passenger trains and freight trains that run through the FFTOD Specific Plan Area on a daily basis are a noise source in the Florence-Firestone community, but because rail operations along these tracks would not change as a result of the FFTOD Specific Plan, no change in noise levels is expected from their operation.

However, as future development projects pursuant to the implementation of the FFTOD Specific Plan are proposed adjacent to—and in the immediate vicinity of—the LA Metro A Line (Blue)

Stations, the noise generated by trains traveling through the FFTOD Specific Plan Area could, depending on distance, potentially expose new residential uses to excessive rail noise. The FTA's Screening Distance for Noise Assessments should be considered whenever siting these new uses in proximity to the rail alignment. For light rail transit, the screening distance for noise assessment is 350 feet for proposed construction with an unobstructed line of sight to the alignment and 175 feet for those with an obstructed line of sight. Because the FFTOD Specific Plan aims to focus residential development within these distances of existing LA Metro A Line stations, there is potential for the project to expose future noise-sensitive land uses to excessive noise levels and is thus potentially significant.

**NOI-2:** *Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?*

## Construction

Construction activities for future development projects that would occur in the FFTOD Specific Plan Area would include demolition and grading activities, which would have the potential to generate low levels of groundborne vibration. Persons residing and working in close proximity to a construction site could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

The various PPV in/sec levels for the types of construction equipment that would operate during the construction of the individual development projects are provided in Table 3.10-10.

**Table 3.10-10: Vibration Source Levels for Construction Equipment**

| Equipment | Approximate PPV (in/sec) | | | | |
|---|---|---|---|---|---|
| | 25 Feet | 50 Feet | 75 Feet | 100 Feet | 150 Feet |
| Pile Driver (Impact) | 0.644 | 0.300 | 0.192 | 0.140 | 0.090 |
| Pile Driver (Sonic) | 0.170 | 0.079 | 0.051 | 0.037 | 0.024 |
| Large Bulldozer | 0.089 | 0.042 | 0.027 | 0.019 | 0.012 |
| Caisson Drilling | 0.089 | 0.042 | 0.027 | 0.019 | 0.012 |
| Loaded Trucks | 0.076 | 0.035 | 0.023 | 0.017 | 0.011 |
| Jackhammer | 0.035 | 0.016 | 0.010 | 0.008 | 0.005 |
| Small Bulldozer | 0.003 | 0.001 | 0.001 | 0.001 | - |

Notes:
in/sec = inches per second
PPV = peak particle velocity
Source: FTA 2018, Propagation calculated using Caltrans 2020 equation 12 with an "n" value of 1.1)

As shown, vibration velocities could reach as high as approximately 0.089 in/sec PPV at 25 feet for typical construction activities. When high-impact activities such as pile driving are required, vibration velocities reach typical levels of 0.644 inch-per-second PPV at 25 feet.

Over the course of the FFTOD Specific Plan build-out period, construction activities associated with future development projects could occur adjacent to or in the vicinity of sensitive receptors because these developments would primarily require redevelopment of already developed properties, which includes mixed uses. Because the FFTOD Specific Plan Area is urbanized, it is anticipated that some existing adjacent uses could be 25 feet or less from construction sites. Consequently, receptors that are located immediately adjacent to a construction site could be exposed to excessive groundborne vibration levels. Based on the vibration source levels shown in Table 3.10-10, adjacent receptors that are located less than 25 feet from typical construction activities could be exposed to peak vibration levels greater than 0.1 PPV in/sec (potential annoyance) and 0.3 PPV in/sec (potential structural damage). If impact pile driving is required, receptors out to nearly 150 feet may be affected.

As future development projects would be spread over the FFTOD Specific Plan's 15-year build-out period and construction events are short-term in nature, it is anticipated that there would be an infrequent amount of vibration events at sensitive land use receptors. However, depending on how close an actual receptor location is to a construction site, the type of construction equipment and the type of receptor building (e.g., older residential buildings, modern commercial buildings), the vibration levels at a receptor location could exceed the vibration threshold for structural damage. As such, vibration impacts during construction associated with the FFTOD Specific Plan could be potentially significant.

### Operations

Future development in the Specific Plan area would introduce additional residential uses in the immediate vicinity of the LA Metro A Line. The FTA recommends a vibration assessment for any proposed residential land use within 150 feet of a light rail transit alignment. Traveling at a speed of approximately 40 miles-per-hour, a light rail train would generate adverse vibration conditions at distances closer than 45 feet from the track centerline per the FTA guideline vibration limit of 72 VdB at residential receptors where people normally sleep. The FFTOD Specific Plan does not anticipate construction of any residential developments within this proximate distance. Therefore, potential vibratory impacts from existing light rail operations are less than significant.

## 3.10.5 Programmatic Mitigation Measures

**MM NOI-1** At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:

- Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County's exterior noise standards.
- For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements.

Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment.

**MM NOI-2** At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any project proposing construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment.

## 3.10.6 Level of Significance After Mitigation

Programmatic mitigation measures MM NOI-1 and MM NOI-2 would reduce potential impacts associated with noise and vibration to a less-than-significant level.

## 3.10.7 Cumulative Impacts

Noise and vibration mitigation measures are provided to reduce potential impacts to less-than-significant levels. Additionally, cumulative construction activities and operations would be required to comply with the construction equipment noise standards, exterior noise standards, and residential air conditioning and refrigeration standards set forth in the LACC. Because all facets of any project would be required to meet these standards, cumulative construction activities and operations would not generate noise levels in excess of allowable limits. Therefore, implementation of the FFTOD Specific Plan's contribution to cumulative construction and operational noise levels would be less than cumulatively considerable.

## 3.10.8 References

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# 3.11 POPULATION AND HOUSING

This section describes implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) with respect to population, housing, and employment in the community of Florence-Firestone.

## 3.11.1 Environmental Setting

### 3.11.1.1 Population

The Florence-Firestone community (FFTOD Specific Plan Area) encompasses approximately 3.48square miles and is identified as Florence-Graham by the U.S. Census Bureau as a Census Designated Place (CDP). In 2010, the Florence-Firestone community had an estimated population of 63,323. According to the most recent data from the 2016 American Community Survey, Florence-Firestone has an estimated population of 64,334 (DRP 2019). This estimate shows a growth rate of 1.6 percent since the 2010 U.S. Census. In comparison, Los Angeles County had a population of 9,818,605 in 2010 (U.S. Census Bureau 2016).

### 3.11.1.2 Housing

According to the 2010 U.S. Census, the number of housing units in the Florence-Firestone community was 14,754. According to 2016 demographics, the number of housing units increased by 2.2 percent to 15,073 units. The housing unit vacancy rate was 7.35 percent and 60.31 percent of the units were renter occupied (DRP 2019). A summary of 2016 housing units by owner, renter, and vacant units is provided in Table 3.11-1.

**Table 3.11-1: Housing Units in the FFTOD Specific Plan Area (Florence-Graham CDP)**

| Housing | Units | Percent |
|---|---|---|
| Owner Occupied | 4,874 | 32.34 |
| Renter Occupied | 9,091 | 60.31 |
| Vacant Housing | 1,108 | 7.35 |
| Total | 15,073 | 100 |

Source: DRP 2019; U.S. Census Bureau 2016

According to the 2010 U.S. Census, there were 3,445,076 housing units and 3,241,204 households in Los Angeles County, with a vacancy rate of 5.9 percent (U.S. Census Bureau 2016). The corresponding estimates for 2016 are 3,504,061 housing units and 3,308,022 households, with a vacancy rate of 5.6 percent (CDF 2016).

### 3.11.1.3 Employment

The following employment data applies to the working age population of 16 years old and older. In the FFTOD Specific Plan Area, 1,327 establishments employed 9,472 people. Retail and service sectors were the most predominant with 905 establishments employing 6,505 or 69 percent of those working in Florence-Firestone. In 2016, 93 percent of the working age residents were employed, with an unemployment rate of 7.1 percent; main employment categories include manufacturing, retail, healthcare, construction, and administrative. A classification of jobs by sector is provided in Table 3.11-2.

**Table 3.11-2: Jobs in FFTOD Specific Plan Area (Florence-Graham CDP) by Sector**

| Industries | Establishments | Employees | Average Employees per Establishment |
|---|---|---|---|
| Total Industries | 1,327 | 9,472 | 317 |
| Agriculture | 2 | 16 | 8 |
| Auto Related (Motor Vehicles/ Parts Dealers, Auto Repair/Maintenance) | 116 | 400 | 8 |
| Construction | 24 | 145 | 6 |
| Manufacturing | 61 | 818 | 13 |
| Transportation Communications/ Public Utilities | 17 | 173 | 31 |
| Wholesale Trade | 78 | 674 | 9 |
| Retail (All) | 533 | 2,650 | 66 |
| Finance (All) | 114 | 553 | 19 |
| Service (All) | 372 | 3,855 | 138 |
| Public Administration | 10 | 188 | 19 |

Source: DRP 2019

In 2014, there were 3,868,109 jobs, and 3,645,350 workers in Los Angeles County (U.S. Census Bureau 2016). The unemployment rate in Los Angeles County in December 2016 (seasonally adjusted) was estimated at 5 percent (EDD 2017).

### 3.11.1.4 Population, Household and Employment Projections

Anticipated population, household, and employment projections for Los Angeles County are provided in Table 3.11-3 based on the 2015 California Department of Economic Development (EDD) population figures and Southern California Association of Governments (SCAG) 2035 estimates (for unincorporated Los Angeles County and for Los Angeles County). The EDD projects a population increase in unincorporated Los Angeles County of 31 percent between 2015 and 2035. Similarly, housing units are anticipated to increase by 29 percent and employment by 29 percent. In addition, projections indicate that the population, housing units, and jobs in unincorporated Los Angeles County will grow at a substantially faster rate than Los Angeles County as a whole through 2035.

**Table 3.11-3: Population, Households, and Jobs Projections for Unincorporated Los Angeles County and Los Angeles County**

| | 2015 | 2035 | 2015–2035 Increase | Compound Annual Growth Rate |
|---|---|---|---|---|
| **Unincorporated Los Angeles County** | | | | |
| Population | 1,049,046[1] | 1,373,889[2] | 31.0% | 1.36% |
| Housing Units | 311,272[1] | 400,958[2] | 28.8% | 1.27% |
| Employment (Jobs) | 258,801[5] | 333,592[2] | 28.9% | 1.28% |
| Employment (Jobs) to Housing Unit Ratio | 0.83 | 0.83 | - | |
| **Total Los Angeles County** | | | | |
| Population | 10,038,388[6] | 11,145,000[3] | 11.0% | 0.52% |
| Housing Units | 3,476,718[6] | 3,809,000[3] | 9.5% | 0.46% |

| | 2015 | 2035 | 2015–2035 Increase | Compound Annual Growth Rate |
|---|---|---|---|---|
| Employment (Jobs) | 4,674,800[4] | 5,062,000[3] | 8.3% | 0.40% |
| Employment (Jobs) to Housing Unit Ratio | 1.34 | 1.33 | - | |

Notes:
[1]Obtained from the California Department of Finance
[2]Based on applying the percent in forecast change for Los Angeles County between SCAG's 2012-2035 Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) and 2016-2040 RTP/SCS and applying the percent change to unincorporated Los Angeles County estimate for 2035 provided in SCAG's 2012-2035 RTP/SCS to derive an updated 2035 estimate for unincorporated Los Angeles County
[3]Obtained from SCAG 2016-2040 RTP/SCS
[4]Obtained from EDD 2015 Data
[5]Used a linear projected growth rate based on the Los Angeles County 2013 employment projection from the County of Los Angeles General Plan Programmatic EIR and the 2035 employment projection provided in the SCAG 2016 RTP/SCS
[6]U.S. Census Bureau 2016
Sources: CDF 2016; SCAG 2012a; SCAG 2016; EDD 2016; and Los Angeles County 2015; and U.S. Census Bureau 2016

The jobs to housing ratio is also provided in Table 3.11-3. "Jobs to housing ratio" is a general measure of the balance between the number of jobs and number of housing units in a geographic area, without regard to economic constraints or individual preferences. The ratio quantitatively expresses the relationship between the number of people working and number of people living in a given area. SCAG uses the jobs to housing ratio as a general tool for analyzing where people work, where they live, and how efficiently they can travel between the two. Jobs/housing balance is achieved by increasing opportunities for people to work and live in close proximity. As described in the County's General Plan Environmental Impact Report (EIR) Population and Housing Section, Los Angeles County considers a jobs to housing ratio between 1.3 and 1.7 to be ideal (Los Angeles County 2015).

The projected population, household units, and employment numbers for the FFTOD Specific Plan Area (based on an interpolation of SCAG's Socioeconomic Data [SED] 2040 Model) are provided in Table 3.11-4.

**Table 3.11-4: Population, Household and Employment Projections for the FFTOD Specific Plan Area**

| FFTOD Specific Plan Area | Units (HH) | Population | Total Employment/Jobs |
|---|---|---|---|
| Existing | 13,424 | 61,750 | 7,947 |
| SCAG-SED 2040 Model (2035 Interpolation) | 14,911 | 66,072 | 9,591 |

Notes:
SCAG-SED = Southern California Association of Governments Socioeconomic Data; HH = head of household
Source: SCAG-SED 2040 Model

## 3.11.2 Regulatory Setting

### 3.11.2.1 State

#### California State Housing Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing

development to meet that need. At the State level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth that would occur in each county based on California Department of Finance population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, the HCD provides the RHNA to the council. The council of governments then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. HCD oversees the process to ensure that the council of governments distributes its share of the state's projected housing need.

State law recognizes the vital role local governments play in the supply and affordability of housing. To that end, California Government Code requires that the housing element achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including people with disabilities.
- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for people of all incomes, including those with disabilities.
- Assist in the development of adequate housing to meet the needs of low- and moderate-income households.
- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing. Promote housing opportunities for all people regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserve for lower income households the publicly assisted multifamily housing developments in each community. Government Code Section 65580, et seq. mandates that every county and city in the state of California publish a Housing Element, to be updated every 8 years. Los Angeles County is currently updating the Housing Element of the General Plan for 2021-2029. The Housing Law requires that a Housing Element address RHNA; adequate site inventory; constraints and barriers; and goals, policies, and implementation programs.

California housing element laws (California Government Code Section 65580–65589) require that every city and county identify and analyze existing and projected housing needs within its jurisdiction; this entails preparation of goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

### 3.11.2.2 Regional

#### Southern California Association of Governments

The SCAG represents Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. It is a regional planning agency and serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment.

### Regional Transportation Plan/Sustainable Communities Strategy

SCAG develops the Regional Transportation Plan (RTP), which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura counties. Senate Bill 375 was enacted to reduce greenhouse gas emissions from motor vehicles and light trucks through integrated transportation, land use, housing, and environmental planning. Under the law, SCAG is tasked with developing a Sustainable Communities Strategy (SCS), an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. The SCS outlines the plan for integrating 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 SCS focuses the majority of new housing and job growth in high quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs to housing balance and more opportunities for transit oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The 2016 RTP/SCS identifies priorities for transportation planning in the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area (SCAG 2016). The Regional Transportation Improvement Program, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements planned within the next 5 to 7 years. To qualify for California Environmental Quality Act (CEQA) streamlining benefits under Senate Bill 375, a project must be consistent with the RTP/SCS.

The 2020–2045 RTP/SCS, also known as Connect SoCal, is a long-range visioning plan that builds on and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020). The SCAG Regional Council adopted Connect SoCal on September 3, 2020.

## 3.11.2.3 Local

### Los Angeles County Housing Element

The 2014-2021 Housing Element for Los Angeles County was certified by HCD on April 30, 2014. Quantified objectives for construction, preservation, and financial assistance over the 2014 to 2021 planning period are provided in Table 3.11-5. Los Angeles County is currently updating the Housing Element of the General Plan for 2021-2029.

**Table 3.11-5: Los Angeles County 2014-2021 Housing Element Quantified Objectives (units)**

| Program | Extremely Low Income (≤30% AMI) | Very Low Income (≤50% AMI) | Lower Income (≤80% AMI) | Moderate Income (≤120% AMI) | Above Moderate Income (>120% AMI) | Total |
|---|---|---|---|---|---|---|
| RHNA | 3,927 | 3,927 | 4,650 | 5,060 | 12,581 | 30,145 |

| Program | Extremely Low Income (≤30% AMI) | Very Low Income (≤50% AMI) | Lower Income (≤80% AMI) | Moderate Income (≤120% AMI) | Above Moderate Income (>120% AMI) | Total |
|---|---|---|---|---|---|---|
| Section 8 Rental Assistance | 1,560 | 2,340 | 0 | 0 | 0 | 3,900 |
| Family Self-Sufficiency | 25 | 75 | 0 | 0 | 0 | 100 |
| First 5 LA | 560 | 0 | 0 | 0 | 0 | 560 |
| New Construction Countywide | 175 | 175 | 43 | 0 | 0 | 350 |
| *Affordable Rental Housing Construction* | *0* | *0* | *43* | *0* | *0* | *43* |
| Homebuyer Assistance | 0 | 200 | 425 | 425 | 0 | 1,050 |
| Ownership Housing Rehabilitation | 1,265 | 1,050 | 1,050 | 0 | 0 | 3,365 |
| Public Housing Modernization | 972 | 973 | 0 | 0 | 0 | 1,945 |
| Preservation of At-Risk Housing | 24 | 662 | 263 | 0 | 0 | 949 |
| **Total** | **8,508** | **9,402** | **6,474** | **5,485** | **12,581** | **42,407** |

Notes:
AMI = adjusted median income
RHNA = Regional Housing Needs Assessment
In the absence of income data for extremely low income households, 50% of the very low income units are assumed to be extremely low income
Source: Los Angeles County Housing Element 2014-2021

## 3.11.3 Methodology

The focus of environmental analysis prepared under CEQA is a project's potential to cause effects on the physical environment.[1] Accordingly, the CEQA Guidelines state that while economic or social information may be included in an EIR or may be presented in whatever form the lead agency desires; social and economic effects shall not be treated as significant effects on the environment.[2] The CEQA Guidelines make clear that there must be a physical change resulting from the project directly or indirectly for an impact to be considered significant.[3]

Social and economic effects—including employment—are relevant CEQA issues to the extent that a chain of cause and effect can be traced from a project through anticipated social and economic changes resulting from the project, to physical changes caused in turn by the economic and social changes (CEQA Guidelines, Sections 15131[a] and 15064[f]). If a project's physical impacts would cause social or economic effects, the magnitude of the social or economic effects may be relevant in determining whether a physical impact is "significant" (CEQA Guidelines Section 15131[b]). If the physical change causes adverse economic or social effects on people,

[1] "Environment" means the physical conditions that exist within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance (Pub. Res. Code Section 21060.5).
[2] CEQA Guidelines Section 15131(a) and 15064(f); see also Public Resources Code Section 21100 and 21151. "Significant effect on the environment" means a substantial, or potentially substantial adverse change in the environment (Pub. Res. Code Section 21068).
[3] See discussion following CEQA Guidelines Section 15131.

those adverse effects may be used as the basis for determining that the physical change is significant (CEQA Guidelines, Section 15064[f]).

Population growth impacts are based on project-specific projections of the number of residents anticipated at build out of the FFTOD Specific Plan, which are described in the context of existing and projected population growth. If buildout of the FFTOD Specific Plan would exceed growth projections as identified in the SCAG RTP/SCS, the resulting growth would be determined to be "substantial." However, the determination of whether the project represents a significant impact is based on whether it would induce additional growth that would result in significant impacts to the environment. Buildout of the FFTOD Specific Plan (e.g., estimates of population, housing units, jobs, vehicle miles traveled [VMT]) and their associated estimates of employment per square foot of commercial use, average household size, potential achievable density assumptions, etc. is based on: 1) SCAG-SED from the SCAG-SED 2012 Model; 2) countywide averages; and 3) market research (see the Future Conditions Projections: SED Inputs for CEQA VMT Modeling Assumption Memo included in the Technical Appendices [Appendix F]).

### 3.11.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on population and housing if it would:

- 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)
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

## 3.11.4 Environmental Impacts

**POP-1:** *Would the project 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)?*

The intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, promote active transportation, improve access to transit, reduce VMT, and streamline the environmental review of future development projects. It would encourage infill development with pedestrian friendly and community serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three Metro A (Blue) Line Stations in the community (Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit oriented district development pattern.

Total buildout of the FFTOD Specific Plan is projected to result in 25,532 total dwelling units, a population of 100,423 (a 3.9 population to housing ratio), and total employment of 11,408 people in the FFTOD Specific Plan Area in 2035; this translates to a net increase of 12,110 new dwelling units, 42,518 more people, and 2,734 new jobs over existing conditions.

A buildout comparison of the FFTOD Specific Plan to SCAG's SED 2040 Model (interpolated to the 2035 buildout year of the FFTOD Specific Plan) is provided in Table 3.11-6.

**Table 3.11-6: FFTOD Specific Plan Buildout Projections Comparison**

| FFTOD Specific Plan Area | Units (HH) | Population | Total Employment/Jobs |
|---|---|---|---|
| SCAG-SED 2040 Model (2035 Interpolation) | 14,911 | 66,072 | 9,591 |
| Buildout of FFTOD Specific Plan (2035) | 25,532 | 100,423 | 11,408 |
| Change | 10,621 | 34,351 | 1,817 |

Notes:
SCAG-SED = Southern California Association of Governments socioeconomic data; HH = head of household

As provided in Table 3.11-6, the socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan Area result in higher densities and more growth than assumed in SCAG's Model (i.e., the FFTOD Specific Plan would substantially increase housing units [approximate 71 percent increase], population [approximate 52 percent increase], and jobs [approximate 19 percent increase]).

The population, housing, and employment projections with buildout of the FFTOD Specific Plan are greater than current projections identified by SCAG. This increase in population, housing, and employment projections is considered substantial. However, the FFTOD Specific Plan is consistent with SCAG's Connect SoCal goals for focusing higher-density development in transit-rich areas. The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMT, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. Furthermore, the determination of whether the proposed growth represents a significant impact is whether the project would induce additional growth that would result in significant impacts to the environment.

The determination of whether the FFTOD Specific Plan would induce growth in the vicinity of the FFTOD Specific Plan Area or within Los Angeles County is based on whether the increase in population and housing in the FFTOD Specific Plan Area would increase the need for additional commercial or public services beyond the existing commercial or public services and the commercial services that would result as part of the project. In addition, a determination of inducement of growth is whether the increase in job growth in the FFTOD Specific Plan Area would increase the need for additional housing beyond the existing housing and the housing proposed as part of the project.

The exceedance of population and housing projection over an approximate 15-year period in the region is considered nominal because the growth within the FFTOD Specific Plan would represent 3 percent of Los Angeles County's incremental population growth and 3 percent of Los Angeles County's incremental residential growth (Table 3.11-3). Furthermore, the FFTOD Specific Plan focuses on infill development within walking distance of the Metro A Line Slauson, Florence, and Firestone stations in an area that is presently completely built out; as described in Section 3.14, Transportation. The FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population. Therefore, the FFTOD Specific Plan would not induce substantial additional population and housing growth that would result in significant impacts to the environment.

The increase in jobs in the FFTOD Specific Plan Area represents 0.5 percent of the projected job growth in Los Angeles County for 2035. Furthermore, based on an average unemployment rate of 7.1 percent for Florence-Firestone and 5 percent for Los Angeles County (2016), it is reasonable to assume that there will be people living in the county and region available to fill the increase in jobs created in the FFTOD Specific Plan Area without a substantial amount of migration into the region that would require new housing beyond the available housing in the FFTOD Specific Plan Area, Los Angeles County, or region. Therefore, the increase in jobs would not induce additional growth that would result in significant impacts to the environment.

Construction of future development projects that would occur in the FFTOD Specific Plan Area would include need for construction labor during short time periods. Due to the employment patterns of construction workers in Southern California and the market for construction labor, construction workers are not likely to relocate their households to any significant degree as a consequence of the job opportunities presented by the project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on housing:

- There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

Therefore, construction activities associated with the project would not result in population, housing, or job growth that would result in significant impacts to the environment.

As described above, both operational and construction activities associated with implementation of the FFTOD Specific Plan would not induce population, housing, or job growth that would result in impacts to the environment. The FFTOD Specific Plan would not induce substantial unplanned population growth in an area, directly or indirectly. Impacts would be less than significant.

In addition, as previously mentioned, California law requires that cities and counties zone land to encourage and facilitate their fair share of the RHNA. Note that the FFTOD Specific Plan provides Los Angeles County with the opportunity to create new affordable units to accommodate the needs of residents. The FFTOD Specific Plan would assist Los Angeles County in implementing the Housing Element and present Housing Element Update of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA. Areas outside of the transit oriented district areas of the FFTOD Specific Plan are considered “stability areas.” Targeted changes in the stability areas are generally limited to addressing Housing Element Update RHNA needs, creating cohesive blocks that connect to the transit oriented district areas or reconciling designations with adjacent jurisdiction plans.

**POP-2:** *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The FFTOD Specific Plan would not result in the permanent displacement of substantial numbers of existing housing, nor would it result in the displacement of substantial numbers of people. Implementation of the FFTOD Specific Plan would encourage infill development with pedestrian friendly and community serving uses near transit stops, enabling additional development of mixed use, commercial, and residential land uses. As described above, buildout of the FFTOD Specific Plan would provide a net increase of 12,110 new residential dwelling units over existing conditions in the FFTOD Specific Plan Area.

Future development projects pursuant to implementation of the FFTOD Specific Plan may result in temporary displacement of residents during construction activities. However, future development projects would occur sporadically at a parcel by parcel project level, the potential displacement of persons residing in an infill or redevelopment parcel would be short-term, and the project would result in a greater number of residential units to house residents of the area, including those that may be temporarily displaced. Therefore, impacts related to displacement of housing or people would be less than significant.

## 3.11.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.11.6 Level of Significance after Mitigation

Impacts would be less than significant. No programmatic mitigation measures are required.

## 3.11.7 Cumulative Impacts

The geographic context for an analysis of cumulative impacts would be Los Angeles County, which represents the planning area that includes the FFTOD Specific Plan Area and the overall population, housing, and job projections for Los Angeles County as a whole.

Past and present development projects have resulted in the population, housing inventory, and nonresidential growth that creates jobs. As development occurs in Los Angeles County, SCAG works with the counties and cities to reevaluate projected growth and ensure there is a balance in geographic areas so that overall projections are not exceeded. Therefore, implementation of the FFTOD Specific Plan (consistent with SCAG's Connect SoCal goals for focusing higher-density development in transit-rich areas, as described above) along with future growth in the region projected by SCAG would not induce substantial, unplanned population growth that would result in significant impacts to the environment.

Because implementation of the proposed FFTOD Specific Plan would not induce population, housing, or job growth that would result in any significant impacts to the environment, the project's incremental contribution to environmental impacts associated with projected growth would be less than cumulatively considerable.

## 3.11.8 References

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# 3.12 PUBLIC SERVICES

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact public services providing fire protection and emergency services, police protection, school services, and library services in the community of Florence-Firestone. Parks and recreational facilities are addressed in Section 3.13, Recreation, and public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 3.16, Utilities.

## 3.12.1 Environmental Setting

### 3.12.1.1 Fire Protection

The Los Angeles County Fire Department (LACoFD) provides fire and rescue services, emergency medical services, and safe haven services for the unincorporated areas of Los Angeles County, including the FFTOD Specific Plan Area. LACoFD participates in the California Fire Service and Rescue Emergency Mutual Aid System.

According to the statistical summary completed by the LACoFD, a total of 393,981 incidents were reported in 2019 for the unincorporated communities, including fire incidents, emergency medical responses, and other incidents such as false alarms (LACoFD 2019). The FFTOD Specific Plan Area covers a very large area. Table 3.12-1 lists the LACoFD fire stations servicing the Florence-Firestone community.

**Table 3.12-1: LACoFD Fire Stations Serving Community of Florence-Firestone**

| Station | Address | Equipment | Staffing |
|---|---|---|---|
| Station 164 | 6301 Santa Fe Avenue<br>Huntington Park<br>*serves the northern part of FFTOD Specific Plan Area | • 4-Person Engine<br>• 4-Person Quint<br>• 2-Person Paramedic Squad | 1 Captain, 1 Firefighter Specialist, 1 Firefighter, 1 Firefighter Paramedic<br>1 Captain, 1 Firefighter Specialist, 2 Firefighters<br>2 Firefighter Paramedics |
| Station 16 | 8010 S. Compton Avenue<br>Los Angeles<br>*serves the southern part FFTOD Specific Plan Area | • 4-Person Engine<br>• 3-Person Engine<br>• 2-Person Paramedic Squad | 1 Captain, 1 Firefighter Specialist, 1 Firefighter, 1 Firefighter Paramedic<br>1 Captain, 1 Firefighter Specialist, 1 Firefighter<br>2 Firefighter Paramedics |
| Station 52 | 4301 S. Santa Fe Avenue<br>Vernon | • 4-Person Engine | 1 Captain, 1 Firefighter Specialist, 2 Firefighters |
| Station 41 | 1815 E. 120th Street<br>Los Angeles | • 4-Person Paramedic Assessment Engine<br>• 2-Person Paramedic Squad | 1 Captain, 1 Firefighter Specialist, 1 Firefighter Paramedic, 1 Firefighter<br>2 Firefighter Paramedics |
| Station 165 | 3255 Saturn Avenue<br>Huntington Park | • 4-Person Engine | 1 Captain, 1 Firefighter Specialist, 2 Firefighters |
| Station 147 | 3161 E. Imperial Highway<br>Lynwood | • 4-Person Quint<br>• 2-Person Paramedic Squad | 1 Captain, 1 Firefighter Specialist, 1 Firefighter, 1 Firefighter Paramedic<br>2 Firefighter Paramedics |

Note:
Station 65 at 1801 E. Century Boulevard is not part of LACoFD, but part of the City of Los Angeles Fire Department.
Source: LACoFD 2021

During 2020, Station 164 which serves the northern part of the community had an average emergency response time of 4:13 minutes. Fire Station 16 which serves the southern part of the community had an average emergency response time 5:19 minutes. LACoFD uses the national guideline of a 5-minute response time for basic life support in urban areas and an 8-minute response time for advanced life support in urban areas. LACoFD currently has no plans to construct new or expand existing fire stations in the FFTOD Specific Plan Area (LACoFD 2021).

### 3.12.1.2 Sheriff Protection

The Los Angeles County Sheriff's Department (LASD) provides general law enforcement services to 42 contract cities and 141 unincorporated communities, as well as additional facilities, hospitals, colleges, LA Metro, and Superior Courts. The FFTOD Specific Plan Area is served by the LASD, Century Sheriff's Station, at 11703 South Alameda Street. The Station's service area encompasses approximately 12.89 square miles with an estimated resident population of 173,514 persons. The Station is currently staffed by 242 sworn personnel and 34 civilian employees. Approximately 3 daytime shift and 2 nighttime shift sworn personnel patrol the Florence-Firestone community. For 2020, the Station received 57,422 total calls for service. Table 3.12-2 shows the average response times for the Century Station Service Area.

**Table 3.12-2: LASD Century Stations Service Area Response Times**

| | Response Time Goal (minutes) | Actual Response Time (2020) (minutes) |
|---|---|---|
| Emergency | 10 | 3.6 |
| Priority | 20 | 7.7 |
| Routine | 60 | 41.2 |

Notes:
Los Angeles County Sheriff's Department
Source: LASD 2021

Although law enforcement personnel have been able to address the current service demand based on the order of priority, the Station is understaffed and would require additional law enforcement resources to provide service needs with the increase of development. No expansion or new facilities are proposed at this time. The LASD is the Los Angeles County Operational Area Law Enforcement Mutual Aid Coordinator under the Law Enforcement Mutual Aid Plan issued by the California Office of Emergency Services (LASD 2021).

### 3.12.1.3 Schools

The FFTOD Specific Plan Area includes a total of nine elementary schools, five middle schools, three high schools, and two private schools. Students can attend schools in either Los Angeles Unified School District (LAUSD) District 6 or District 7. A list of the public, charter, and private schools in the FFTOD Specific Plan Area is provided in Table 3.12-3. All schools are within the jurisdiction of the LAUSD (CDE 2021).

**Table 3.12-3: Schools in the FFTOD Specific Plan Area**

| School Name and Address | 2019-2020 Enrollment |
|---|---|
| **Elementary Schools** | |
| Graham Elementary School, 8407 South Fir Avenue | 703 |
| Miramonte Elementary School, 1400 East 68th Street | 711 |
| Parmelee Avenue Elementary School, 1338 East 76th Street | 849 |
| Russell Elementary School, 1263 Firestone Boulevard | 883 |
| Florence Avenue Elementary School, 7211 Bell Avenue | 709 |
| Lillian Elementary School, 5909 Lillian Street | 491 |
| Dr. Lawrence H. Moore Math, Science, Technology Academy, 1321 East 61st Street | 677 |
| Judith F. Baca Arts Academy, 1536 E 89th Street | 733 |
| Wisdom Elementary, 1125 E 74th Street | 835 |
| **Total Enrollment** | **6,591** |
| **Middle Schools** | |
| Charles Drew Middle School, 8511 Compton Avenue | 710 |
| Thomas A. Edison Middle School, 6500 Hooper Avenue | 1,268 |
| Walnut Park Middle School, 7500 Marbrisa Avenue | 499 |
| Alliance Kory Hunter Middle School)(Charter), 5886 Compton Avenue | 455 |
| KIPP Philosophers Academy School (Charter), 8300 South Central Avenue | 316 |
| **Total Enrollment** | **3,248** |
| **High Schools** | |
| Diego Rivera Learning Complex, 6100 South Central Avenue | 560 |
| Alliance Margaret M. Bloomfield Technology Academy High School (Charter), 7907 Santa Fe Avenue | 525 |
| Animo Pat Brown School (Charter), 8255 Beach Street | 600 |
| **Total Enrollment** | **1,685** |
| **Private Schools** | |
| St. Malachy Catholic Elementary (Pre–K), 1200 East 81st Street | 176 |
| St. Aloysius School (TK–8), 2023 East Nadeau Street | 258 |
| **Total Enrollment** | **434** |

The Diego Rivera Learning Complex, constructed in 2011, and the Walnut Park Middle School, constructed in 2013, were built in response to the growing number of students in the Florence-Firestone community and to relieve overcrowding in schools.

### 3.12.1.4 Libraries

The FFTOD Specific Plan Area includes two Los Angeles County Public Libraries: Florence Express Library at Roosevelt Park, 7600 Graham Avenue and Graham Library at 1900 East Firestone Boulevard. Both libraries are managed by the Los Angeles County Library system, which provides library services to the unincorporated areas and 49 of 88 incorporated cities of Los Angeles County.

The Florence Express Library is a temporary library and has a facility size of 2,160 square feet, a collection of 26,427 books and other library materials, and 4 public access computers. The Florence Express Library serves approximately 48,412 persons residing within the unincorporated areas of Los Angeles County. There are plans currently in design for a replacement Florence Library to be located on the second floor of the Los Angeles County Constituent Center at 7807 South Compton Avenue. With construction anticipated to start November 2021, this new 7.970 square-foot library is expected to open Spring 2023 and will permanently replace the temporary library located at Roosevelt Park.

The Graham Library is at 1900 East Firestone Boulevard and has a facility size of 5,125 square feet, a collection of 31,268 books and other library materials, and 13 public access computers. The Graham Library serves approximately 32,323 persons residing within the unincorporated areas of Los Angeles County.

Los Angeles County Library is a member of the Southern California Library Cooperative, a consortium of 40 independent city, county, and special district public libraries in Los Angeles and Ventura counties which cooperate in providing library service to the residents of all participating jurisdictions.

The Los Angeles County Library service level guidelines consist of a minimum of 0.5 gross square foot of library facility space per capita, 3.0 items (books and other library materials) per capita for regional libraries and 2.75 items per capita for community libraries, and 1.0 public access computers per 1,000 people served. Both the proposed new Florence Library and Graham Library currently do not meet the library facility guidelines for the Florence-Firestone community (Los Angeles County Library 2021).

Additionally, due to the increasing resources being available online, the availability of high speed internet services and a decrease in the need to physically visit a library, the County's library service needs are changing. Los Angeles County Library provides thousands of online reference materials, books, magazines, music, videos, online learning resources, and a mobile library app. Thus, many of the library's resources can be obtained offsite (e.g. from home, work, or mobile internet device).

#### 3.12.1.5 Other Public Facilities

In addition to fire, sheriff, school and library facilities, the FFTOD Specific Plan Area includes other public facilities, such as senior centers, daycare facilities, and community centers, some of which are operated by Los Angeles County agencies. There are two senior centers, one daycare facility and three community centers within the FFTOD Specific Plan Area.

### 3.12.2 Regulatory Setting

#### 3.12.2.1 State

##### California Fire Code

The purpose of the California Fire Code (CFC) is to provide minimum standards to increase the ability of a building to resist fire. The CFC regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. It addresses fire protection and prevention as well as life safety and safe storage and use of hazardous materials. The CFC composes Part 9

of Title 24 of the California Code of Regulations. The CFC is updated on a 3-year cycle; the most recent edition of Title 24 was published on July 1, 2019, with an effective date of January 1, 2020.

#### California Building Code

The California Building Standards Code is a compilation of building standards. All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies. The California Building Code comprises Title 24, California Code of Regulations, Part 2. The California Building Code is updated on the same cycle as the CFC.

#### Assembly Bill 2926: School Facilities Act of 1986

Assembly Bill (AB) 2926 was enacted in 1986 to assist in providing school facilities to serve students generated by new development. AB 2926 authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as California Environmental Quality Act (CEQA) mitigation to satisfy the impact of development on school facilities.

#### Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive financing and reform program for school facilities and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity due to development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be full and complete mitigation for school facilities.

Under SB 50, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply if the state runs out of bond funds, allowing the governing school district to impose 100 percent of the cost of school facility or mitigation on the developer, minus any local dedicated school funds.

### 3.12.2.2 Local

#### Los Angeles County Library Facilities Mitigation Fees

Los Angeles County applies a library facilities mitigation fee to new residential developments in the unincorporated areas. This fee is intended to mitigate the significant adverse impacts of increased residential development on the Los Angeles County Library System. The library

facilities mitigation fee is based on the estimated cost of providing the projected library facility needs in each library planning area, defined in Section 22.72.030 of Los Angeles County's Zoning Code. There are seven library planning areas, and the libraries within the FFTOD Specific Plan Area fall in the Southeast Library Planning Area. The mitigation fee for the Southwest Library Planning Area is $970 per dwelling unit for fiscal year 2019-20.

The mitigation fee in each planning area is reviewed annually by the Los Angeles County Librarian in consultation with the Los Angeles County Auditor-Controller. On July 1st of every year, the fee in each library planning area is adjusted based on the Consumer Price Index. According to the Zoning Code, no adjustment shall increase or decrease the fee to an amount more or less than the amount necessary to recover the cost of providing applicable library facilities and services. The provisions of the Library Facilities Mitigation Fee Ordinance are applicable to residential projects only. All library facilities mitigation fees received by Los Angeles County are deposited into a special library capital facilities fund (one for each library planning area) and expended solely for the purposes for which the fees were collected.

### Los Angeles County General Plan Public Services and Facilities Element

The Los Angeles County General Plan Public Services and Facilities Element provides guidance for the planning of public facilities and infrastructure in conjunction with land use development and growth, including utilities, early care and educational facilities, and libraries. A list of the goals and policies of the General Plan that relate to public services, educational facilities, and libraries is provided in Table 3.12-4.

**Table 3.12-4: Los Angeles County General Plan Goals, Objectives, and Policies Related to Public Services**

| Goal | Objective/Policy |
|---|---|
| **Goal PS/F 1**: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development. | • Policy PS/F 1.1: Discourage development in areas without adequate public services and facilities.<br>• Policy PS/F 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.<br>• Policy PS/F 1.3: Ensure coordinated service provision through collaboration between County departments and service providers.<br>• Policy PS/F 1.4: Ensure the adequate maintenance of infrastructure.<br>• Policy PS/F 1.5: Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.<br>• Policy PS/F 1.6: Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.<br>• Policy PS/F 1.7: Consider resource preservation in the planning of public facilities. |
| **Goal PS/F 7**: A County with adequate educational facilities. | • Policy PS/F 7.1: Encourage the joint-use of school sites for community activities and other appropriate uses.<br>• Policy PS/F 7.2: Proactively work with school facilities and education providers to coordinate land use and facilities planning.<br>• Policy PS/F 7.3: Encourage adequate facilities for early care and education. |
| **Goal PS/F 8:** A comprehensive public library system. | • Policy PS/F 8.1: Ensure a desired level of library service through coordinated land use and facilities planning.<br>• Policy PS/F 8.2: Support library mitigation fees that adequately address the impacts of new development. |

### *Florence-Firestone Community Plan*

The Florence-Firestone Community Plan(FFCP) is a policy document for the future development, conservation, and maintenance of the Florence-Firestone community. The Public Facilities section of the FFCP address goals and policies to enhance public facilities and services to accommodate the changing needs of the community over time. These goals and policies highlight the need to increase safe access, and awareness of Los Angeles County services and resources, as well as providing space and capacity to utilize public services and facilities for the youth and community of Florence-Firestone.

## 3.12.3 Methodology

### Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist, the project would have a significant impact on public services if it would:

- Create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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:
    - Fire protection
    - Sheriff protection
    - Schools
    - Libraries
    - Other public facilities

The Appendix G significance criteria listed below is analyzed in Section 3.13, Recreation:

- Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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 parks?

## 3.12.4 Environmental Impacts

**PUB-1:** *Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives?*

### Fire Protection

As described above, LACoFD's response time goals in urban areas are five minutes or less for the first responding unit for fire and emergency medical responses, and eight minutes or less for advanced life support from the paramedic unit. The average response times for the two closest fire stations, Stations 164 and 16, were 4:13 minutes and 5:19 minutes, respectively. As such, these

stations are meeting LACoFD's average response time goals for fire and paramedic responses and fire protection serving the area are adequate for the existing development and land use.

The buildout of the FFTOD Specific Plan Area would result in a net increase of approximately 42,518 additional people associated with approximately 12,110 net new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area. The increase in residential and nonresidential development is expected to increase typical fire and emergency service calls and may lead to the need for new or expanded fire stations, additional equipment, and additional personnel in order to maintain adequate response times.

This increase would be gradually implemented through 2035, and the fire department would add staff and equipment to the existing stations on an as-needed basis in order to accommodate these increased demands. Due to the large number of existing County fire stations within the FFTOD Specific Plan Area and the anticipated infill development proposed by the FFTOD Specific Plan that would locate all new development within the already served area, the increase in fire department staffing and equipment required to serve the buildout of the proposed Specific Plan would be accommodated by the existing fire stations, and new or physically altered fire protection facilities would not be required to serve the buildout of the Specific Plan. Thus, physical impacts to the environment related to the development of or expansion of fire department facilities would not occur.

Additionally, individually proposed development projects within the Specific Plan area would require incorporation of fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code). These project design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits for each development project in the Specific Plan. These existing County permitting procedures for development further minimize potential impacts associated with provision of fire protection services. Therefore, implementation of the Specific Plan would not require provision of new or physically altered fire protection facilities construction of which could cause significant environmental impacts. Hence, the Specific Plan would not result in impacts related to fire protection services.

### Sheriff Protection

As discussed in Section 3.12.1.2, LASD's Century Sheriff's Station is currently understaffed. However, law enforcement personnel have been able to address the current service demand based on the order or priority and have responded to service calls well below the response time goals. In 2020, emergency responses averaged 3.6 minutes with a goal of 10 minutes; priority responses averaged 7.7 minutes with a goal of 20 minutes; and routine responses averaged 41.2 minutes with a goal of 60 minutes (LASD 2021).

The buildout for the proposed FFTOD Specific Plan would increase residents, employees, and daytime population of the Station's service area, which would generate an increased demand for law enforcement services. To accommodate the increase in demand, LASD would be required to hire additional police officers and administrative staff to ensure response times are not adversely impacted. For planning purposes, LASD uses the generally accepted law enforcement service ratio of one patrol deputy per one 1,000 residents. Applying this service ratio, LASD calculates that

buildout of the Specific Plan would require approximately 42 additional deputies to serve the FFTOD Specific Plan Area.

Operational funding for the LASD is derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the County's General Fund. The County Board of Supervisors then allocates the revenue for various County-provided public services, including LASD's services. As future development occurs, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury. A portion of these revenues would be allocated to the LASD during the County's annual budgeting process to ensure adequate staffing and equipment are provided to adequately serve project-related increases in service-call demands.

Additionally, individual projects would be reviewed by County and Sheriff Department staff prior to the developer's receipt of permits to ensure that appropriate security measures are included in each development (i.e., the general principles of Crime Prevention Through Environmental Design [CPTED]) and would be required to pay all applicable required law enforcement mitigation fees associated with the project. CPTED would reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior while encouraging the legitimate uses of the site including defensible space, territoriality, surveillance, lighting, landscaping, and physical security. The implementation of the individual project's Construction Traffic Management Plan and Construction Mitigation Plan would address construction-related traffic congestion and emergency access issues such as temporary lane closures for the installation of utilities, flag persons and detours to ensure safe traffic operations, and construction zone speed limits and signage. These measures would further reduce the need for sheriff services to a level that could be accommodated by existing facilities.

**PUB-2:** *Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered school, library, or other public facilities in order to maintain acceptable service ratios or other performance objectives?*

### School Services

The buildout of the FFTOD Specific Plan Area would result in a net increase of approximately 42,518 additional people associated with 12,110 net new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area. Overall project buildout would generate approximately 5,570 total students, consisting of 2,664 elementary school students, 1,211 middle school students, and 1,695 high school students. Estimated project student generation is provided in Table 3.12-5.

**Table 3.12-5: Estimated Project Student Generation**

| Net Increase (units) | Elementary School (K-5)[1] | Middle School (6-8)[2] | High School (9-12)[3] | Total |
|---|---|---|---|---|
| 12,110 | 2,664 | 1,211 | 1,695 | 5,570 |

Notes:
1 Generation Factor: 0.22
2 Generation Factor 0.10
3 Generation Factor 0.14
Source: City of Los Angeles 2006

As previously discussed, the Diego Rivera Learning Complex and Walnut Park Middle School were constructed to relieve the overcrowding in schools due to the growing number of students in the Florence-Firestone community. Development of the FFTOD Specific Plan is expected to be gradually implemented through 2035. Enrollment fluctuates over time as students graduate, thereby allowing additional capacity.

Additionally, projects developed under the Specific Plan would pay SB 50 school impact fees to the LAUSD. For every new residential development in the Specific Plan Area, developer fees would be collected and contributed towards LAUSD's funds to construct new or expand existing school facilities. Such fees are defined as full and complete mitigation for the impact of development projects on school facilities. Furthermore, school capacity and impact fee payment pursuant to implementation of the FFTOD Specific Plan would be assessed on a project-by-project basis. Impacts would be less than significant.

### Library Services

As previously described, the Florence and Graham libraries are both already experiencing deficiencies. Buildout of the FFTOD Specific Plan would result in 12,110 additional residential units that would house approximately 42,518 additional persons which would create a need for an additional 21,259 square feet of facility space, 116,925 collection items, and 43 public access computers. This increase in population would further strain library services in this service area.

However, to minimize the impact of residential projects on library services, Los Angeles County Library collects a one-time Library Facilities Mitigation Fee from developers at the time building permits are requested for all new residential dwellings located within the unincorporated areas of Los Angeles County served by Los Angeles County Library. The FFTOD Specific Plan is located in the Library's Planning Area 5- Southeast which requires $970 per dwelling unit. A total of $11,746,700 of developer fees would be collected for development projects under the FFTOD Specific Plan which anticipates 12,110 additional residential units. Use of such fees by Los Angeles County Library for construction of new and/or expanded library facilities would reduce project impacts on library facilities in the FFTOD Specific Plan Area. Impacts would be less than significant.

### Other Public Facilities

As discussed in Section 3.12.1.5, two senior centers, one daycare facility and three community centers are located within the FFTOD Specific Plan Area. Because the proposed Specific Plan would implement redevelopment and infill development within the urban area that is already served by developed service infrastructure, as directed by the County General Plan's policies, the project would not require development of other public service facilities and impacts would not occur.

## 3.12.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.12.6 Level of Significance after Mitigation

Impacts would be less than significant.

## 3.12.7 Cumulative Impacts

The cumulative study area for public services includes all areas within the Florence-Firestone community and the areas (such as the city of Los Angeles, city of Lynwood, and city of Compton areas) that are adjacent to the FFTOD Specific Plan Area. Future growth in the vicinity of the FFTOD Specific Plan Area is anticipated to be similar in character and intensity as existing development and proposed land uses under the FFTOD Specific Plan. It is reasonable to assume that as future developments in the vicinity would be processed through Los Angeles County and adjacent incorporated cities, these projects would be reviewed by the LACoFD, LASD, LAUSD, and the Los Angeles County Public Libraries to ensure potential environmental impacts to these public services can be accommodated. Therefore, the project would not contribute to cumulative environmental impacts to public services.

Cumulative development projects are anticipated to occur within the Specific Plan vicinity throughout the implementation period of the proposed Specific Plan, which would generate demand for additional fire protection and emergency medical services. Like the proposed Specific Plan, the related projects would be reviewed by County Fire Department staff prior to permit approval and would be required to implement fire protection design features per the California Building Code and Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code), which would reduce potential fire hazards. Because the cumulative area is urban and developed, is served by six stations, and future cumulative development projects would consist of redevelopment or infill development of new uses that would be required to meet current fire codes, cumulative development would not result in physical environmental impacts related to the need to provide additional facilities for fire protection services. Because the proposed project and cumulative projects would not result in physical environmental impacts related to fire protection services, the proposed project would not have a cumulatively considerable impact.

Overall, as described by the County General Plan, projected growth in the County is not anticipated to result in the need for new or expanded sheriff facilities in the portion of the County including the Specific Plan area, and the existing facilities would be able to accommodate buildout of the proposed Specific Plan. Therefore, cumulative development would not result in physical environmental impacts related to sheriff services and cumulative impacts would be less than significant. Because the proposed project and cumulative projects would not result in physical environmental impacts related to sheriff services, the proposed project would not have a cumulatively considerable impact.

Although cumulative development would increase residential development and introduce new students enrolling in LAUSD schools, under state law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995[h]). Therefore, the increase in demand for school facilities and services due to cumulative development would be adequately mitigated to a less than significant level by the payment of SB 50 fees.

Cumulative development in accordance with the County's General Plan would increase residential development and introduce new residents that may increase demand on existing library services. The County applies a library facilities mitigation fee to new residential developments in the unincorporated areas and would mitigate the significant adverse impacts of increased residential development on the library system. The library facilities mitigation fee is based on the estimated cost of providing the projected library facility needs in each of the seven library planning areas per Section 22.72.030 of the County's Zoning Code. Therefore, cumulative impacts to library facilities and services would be less than significant, and project impacts would not be cumulatively considerable.

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# 3.13 RECREATION

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact public parks and recreational facilities.

## 3.13.1 Environmental Setting

Los Angeles County has parkland goals of four acres of local parkland per 1,000 residents, and six acres of regional parkland per 1,000 residents. The ratio of park space per 1,000 residents for Los Angeles County averages at 3.3 acres (DPR 2015).

### 3.13.1.1 Existing Parks

There are five parks and recreational facilities within the FFTOD Specific Plan Area, totaling 78.8 acres. All five parks are operated by the Los Angeles County Department of Parks and Recreation. A list of these parks is provided in Table 3.13-1; these parks are further described below.

**Table 3.13-1: Public Parks in the FFTOD Specific Plan Area**

| Name and Address | Amenities | Size (acres) |
|---|---|---|
| Ted Watkins Memorial Park<br>1335 E 103rd Street,<br>Los Angeles, CA 90002 | Baseball fields, softball field, soccer field, tennis courts, basketball courts, volleyball court, playground, fitness zone, pool building, skate park, plaza, picnic and barbeque areas, community center, gymnasium, and computer lab | 27.67 |
| Franklin D. Roosevelt Park<br>7600 Graham Avenue,<br>Los Angeles, CA 90002 | Baseball fields, softball field, soccer field, tennis courts, basketball courts, volleyball court, skate park, gymnasium, swimming pool, picnic area, senior center, computer lab and playground | 24.35 |
| Col. Leon H. Washington Park<br>8908 South Maie Avenue,<br>Los Angeles, CA 90002 | Futsal court, tennis courts, basketball court, picnic area, fitness zone, community garden, playground, community center, gymnasium, computer lab, and pool building | 12.63 |
| Mary MacLeod Bethune Park<br>1244 East 61st Street,<br>Los Angeles, CA 90002 | Gymnasium, community center, computer lab, baseball field, softball field, handball court, basketball court, playground, picnic area, pool building, and skate park | 5.31 |
| El Parque Nuestro<br>1675 Gage Avenue,<br>Los Angeles, CA 90002 | Children's playground, fitness zone, multi-use trail, educational information kiosk | 0.53 |

#### Ted Watkins Memorial Park

Ted Watkins Memorial Park is at 1335 East 103rd Street and is bound by Century Boulevard to the north, Success Avenue to the east, East 103rd Street to the south, and South Central Avenue to the west. The park encompasses 28 acres, making it the largest park in the FFTOD Specific Plan Area. The park provides space for activities such as baseball, flag football, basketball, and soccer. It also includes the following amenities: a swimming pool, skate park, community center, gymnasium, picnic and barbeque areas, walking path with fitness zones, and a farmer's market.

### Franklin D. Roosevelt Park

Franklin D. Roosevelt Park is at 7600 Graham Avenue and is bound by Holmes Avenue to the north, Whitsett Avenue to the east, Nadeau Street to the south, and Graham Avenue to the west. The park is within the change areas, southeast of the Florence Station for the LA Metro A Line. The park encompasses 24.35 acres and includes the following amenities: athletic fields, multi-purpose fields, athletic courts, skate park, two gymnasiums, swimming pool, and a multi-purpose community senior center that offers community programs for youth, adults, and seniors.

### Col. Leon H. Washington Park

Col. Leon H. Washington Park is at 8908 South Maie Avenue and is bound by Firestone Boulevard to the north, Graham Avenue to the east, East 92nd street to the south, and Maie Avenue to the west. The park is within the change areas, southwest of the Firestone Station for the LA Metro A Line. The park encompasses 12.63 acres and includes the following amenities: a playground, community recreation center, gymnasium, computer lab, swimming pool, and athletic facilities. The park is also home to the Drew League, a popular basketball league that hosts games every weekend from May to August, totaling more than 155 games per season.

### Mary MacLeod Bethune Park

Mary MacLeod Bethune Park is at 1244 East 61st Street and is bound by East 61st Street to the north, Hooper Avenue to the east, East Gage Avenue to the south, and South Central Avenue to the west. The park encompasses 5.3 acres and includes the following amenities: a gymnasium, community room, computer lab, baseball diamond, swimming pool, and a skate park. A partnership between Los Angeles County and Kids N' Sports provides organized youth sports leagues including baseball, softball, soccer, and flag football at this park.

### El Parque Nuestro

El Parque Nuestro is at 1675 Gage Avenue and is bound by East 63rd Street to the north, Holmes Avenue to the east, East Gage Avenue to the south, and Converse Avenue to the west. The park is within the change areas, midway between the Slauson and Firestone stations for the LA Metro A Line. The park encompasses 0.53 acres and is the only pocket park in the community; it includes the following amenities: a children's playground, training circuit, recycled picnic tables, an educational information kiosk, and lawn areas.

## 3.13.1.2 Proposed Parks

A new, multi-block park will be developed in the community of Florence-Firestone. The park will be in a portion of the undeveloped utility corridor owned by the Los Angeles Department of Water and Power. The park will include new jogging/walking paths, half basketball courts, a multi-purpose field, playground areas, exercise equipment, an outdoor stage, public art, gardens, and landscaping and lighting throughout the park. It is scheduled for completion in 2023 (Yom 2021).

## 3.13.1.3 Parks to Population Ratio in the FFTOD Specific Plan Area

According to the Los Angeles Countywide Parks and Recreation Needs Assessment (Parks Needs Assessment) managed by the Los Angeles County Department of Parks and Recreation, the

Unincorporated Florence-Firestone study area has a total of 78.8 park acres for a population of 64,585 residents.[1] Thus, the parkland to population ratio is 1.2 acres of local parkland per 1,000 residents, far below the Los Angeles County standard of four acres per 1,000 residents. This Park Needs Assessment determined that Florence-Firestone has a very high level of park need where an increase in the population density of the area may increase the use of parks to the extent that further deterioration of the park facilities could occur (DPR 2016).

## 3.13.2 Regulatory Setting

### State

#### *Quimby Act (Government Code 66477)*

The California Quimby Act, as part of the Subdivision Map Act, applies to residential subdivisions and permits cities and counties, by ordinance, to require the dedication of land, the payment of in-lieu fees, or a combination of both, for park and recreational purposes as a conditional of approval for a final tract map or parcel map. The Quimby Act requires that developers set aside land, donate conservation easements, or pay fees for park improvements. The goal of the Quimby Act is to require developers to help mitigate the impacts of development. The Quimby Act establishes a standard of dedicating three acres of parkland per 1,000 residents for subdivisions.

#### *The Mello-Roos Community Facilities Act of 1982*

The Mello-Roos Community Facilities Act provides an alternative method of financing certain public capital facilities and services, especially in developing areas and areas undergoing rehabilitation. This state law empowers local agencies to establish Community Facilities Districts, special districts established by local governments in California, as a means of obtaining community funding.

#### *Landscaping and Lighting Act of 1972, California Streets and Highway Code Section 22500-22509*

The California Landscaping and Lighting Act of 1972 authorizes local legislative bodies to establish benefit related assessment districts or landscaping and lighting districts. Legislative bodies can levy assessments for the construction, installation, and maintenance of certain public landscaping and lighting improvements, including local public parks.

### Local

#### *Los Angeles County Code*

The Los Angeles County Code contains provisions that regulate the provision of parklands for new subdivisions in accordance with the Quimby Act. County Code Section 21.24.340 (Residential Subdivisions, Local Park Space Obligation, Formula) uses a formula to determine the amount of parkland required to be dedicated by the subdivider as a part of the subdivision map approval process. In accordance with Section 21.28.140, the developer may choose to pay a fee in lieu of the provision of parkland but develop it with amenities equal to the value of what the in-lieu fee

[1] This assessment includes Augustus Hawkins Natural Park, which is not accounted for in the FFCP because it is outside of the boundaries of the FFCP area.

would be. The formula considers the number of dwelling units in the subdivision, the average household size by Park Planning Area (PPA), and the adopted ratio of 3 acres of parkland per 1,000 residents, per the Quimby Act. As a condition of zone change approval, General Plan amendment, specific plan approval, or development agreement, Los Angeles County may require a subdivider to dedicate land according to the General Plan goal of 4 acres of local parkland per 1,000 residents, and 6 acres of regional parkland per 1,000 residents.

Once the local park space obligation is determined, Los Angeles County Code Section 21.24.350 (Residential Subdivisions, Provision of Local Park Sites) includes regulations pertaining to the siting of park facilities as well as provisions that give the option to subdividers of 50 units or less to choose to provide the obligatory amount of parkland, any excess of which would be credited to the subdivision or otherwise allow any remaining obligation to be satisfied by the payment of park fees in accordance with the provisions of Section 21.28.140. In addition, because only the portions of the land dedicated for parkland that are suitable for park use can be counted against the obligation of the subdivider, attributes of the park space including the slope of the site are used to determine the amount of land that can be counted against the subdivider's obligation. For example, for the portions of the site in excess of 20 percent slope, only 10 percent of the acreage will be counted against the subdivider's obligation, whereas all of the land that is less than 3 percent slope can be counted toward the obligation.

Section 21.28.140 (Park Fees Required When, Computation and Use) has provisions regarding the payment of in-lieu fees for any portion of the dedication obligation not satisfied by the subdivider. These fees would be enforced as a condition of approval on the final approval of the subdivision. The in-lieu fee is determined by multiplying the amount of park space not satisfied by the representative land value for the appropriate PPA. Park fees are only used for acquiring local park land or developing new or rehabilitating existing recreational facilities. This section also makes it the responsibility of the Los Angeles County Department of Parks and Recreation to develop a schedule specifying how, when, and where it will use the land, fees, or both from each subdivision to develop park or recreational facilities within the applicable PPA. The Florence-Firestone community is in PPA 23. The local park space obligations in acres per residential unit for residential subdivisions in PPA 23 are provided in Table 3.13-2.

**Table 3.12-2: Parkland Obligation for Residential Subdivisions, PPA 23 (Florence-Firestone)**

| Residential Unit Type | Average Household Size | Acres per Resident | Acres per Residential Unit |
|---|---|---|---|
| Detached and Attached Single-Family Residences | 4.50 | .003 | 0.01353 |
| Multi-Family Housing Containing Two to Four Dwelling Units | 3.78 | .003 | 0.01095 |
| Multi-Family Housing Containing Five or More Dwelling Units | 3.43 | .003 | 0.00999 |
| Mobile Homes | 3.90 | .003 | 0.01164 |

Notes:
PPA = Park Planning Area
Source: Los Angeles County Ordinance Section 21.24.340

### *Proposition A: Safe Neighborhood Parks Proposition of 1992 and 1996; and Measure A*

Los Angeles County residents recognize the importance of the region's parks, beaches, open spaces, and natural areas and have repeatedly supported them by voting for local parks funding

measures. In 1992 and 1996, Los Angeles County voters approved two local parks funding measures, both called Proposition A. The 1992 Proposition A created the Regional Park and Open Space District and generated annual revenue of $52 million until its expiration in 2015. The 1996 Proposition A generates $28 million annually and expired in 2019. Since 1992, the Regional Park and Open Space District has awarded grant funds for more than 1,500 projects for parks, recreational, cultural, and community facilities as well as beaches and open space lands throughout the county.

Measure A was developed based on the findings of the Los Angeles Countywide Parks and Recreation Needs Assessment and was approved in November 2016 with nearly 75% of voters supporting it. Generating more than $90 million per year for Los Angeles County's local parks, beaches, and open space areas, Measure A is an annual parcel tax of 1.5 cents per square foot of improved property, and includes both formula-based allocations to study areas and competitive grants that are open to public agencies, nonprofit organizations, and schools. Unlike Proposition A, Measure A does not have an expiration date.

### *County of Los Angeles Park Design Guidelines and Standards*

The County of Los Angeles Park Design Guidelines and Standards are intended to guide Los Angeles County staff, design professionals, and other agencies on how to design and develop parks that meet Los Angeles County standards and expectations. The manual provides input from the Department of Parks and Recreation staff, other departments, and outside partners such as nonprofit organizations and private developers with an interest in park design. The guidelines and standards address topics for recreational facilities such as spatial organization, circulation, landscaping, utilities, and sustainable products and plants.

### *Los Angeles County General Plan Parks and Recreation Element*

The Los Angeles County General Plan Parks and Recreation Element guides policy for the maintenance and expansion of Los Angeles County's parks and recreation system. The purpose of the Parks and Recreation Element is to plan and provide for an integrated parks and recreation system that meets the needs of residents. The following policies pertain to the project:

- **Policy 3.1**: Acquire and develop local and regional parkland to meet the following Los Angeles County goals: 4 acres of local parkland per 1,000 residents in the unincorporated areas and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County.
- **Policy 3.2**: For projects that require zone change approvals, general plan amendments, specific plans, or development agreements, work with developers to provide for local and regional parkland above and beyond their Quimby Act obligations.

### *Florence-Firestone Community Plan*

The Florence-Firestone Community Plan (FFCP) is a policy document for the future development, conservation, and maintenance of the Florence-Firestone community. The Parks and Recreation section of the FFCP addresses the existing conditions of parks in the community. There are five parks in the community that provide a range of active and passive recreation facilities from athletic fields to playgrounds and picnic areas. Despite its existing parks, the community remains underserved by local and regional parks and open space. The parks' total approximately 80 acres

of designated park space. This equates to approximately 1 acre of parkland per 1,000 residents, far below the goal standard of 4 acres of parkland per 1,000 residents established by the Los Angeles County General Plan. The FFCP contains the following policies pertaining to parks, pathways, and connectivity:

- **Policy PR 3.1:** Acquire and develop local and regional parkland to meet the following County goals: 4 acres of local parkland per 1,000 residents in the unincorporated areas and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County.
- **Policy PR-4.1:** Pathway Network. Develop a comprehensive community-wide network with urban trails, green pathways, and bike and pedestrian infrastructure, connecting neighborhoods to open space, transit, public facilities, and community destinations.
- **Policy PR-4.2:** Park Connectivity. Provide safe and visible pedestrian connections within 0.5-mile of parks, including clear pathways to transit stations, landscaped curb extensions, lighted crosswalks, pedestrian access across landscaped medians, attractive bridge crossings over the LA Metro Blue Line and railroad rights-of-way, and other elements, where appropriate, to ensure safe park access.

### *Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment*

Adopted by the Board of Supervisors on July 5, 2016, the Parks Needs Assessment was a historic and significant undertaking to engage all communities within Los Angeles County in a collaborative process to gather data and input for future decision-making on parks and recreation. The primary goal of the assessment was to quantify the magnitude of need for parks and recreational facilities and determine the potential costs of meeting that need. The final report uses a transparent, best-practices approach to evaluate park and recreation needs, and is the product of an engagement process that involved the public, cities, unincorporated communities, community-based organizations, and other stakeholders. Specifically, the assessment:

- Uses a set of metrics to measure and document park needs for each study area
- Establishes a framework to determine the overall level of park need for each study area
- Offers a list of priority park projects for each study area
- Details estimated costs for the priority park projects by study area
- Builds a constituency of support and understanding of the park and recreational needs and opportunities
- Informs future decision-making regarding planning and funding for parks and recreation

The FFTOD Specific Plan Area is in the Unincorporated Florence-Firestone study area, which is an area of Very High level of park need. As described, the Parks Needs Assessment indicates that the Unincorporated Florence-Firestone study area has a total of 78.8 park acres for the population of 64,585 residents, or 1.2 park acres per 1,000 residents. (DPR 2016).

## 3.13.3 Methodology

This section evaluates the potential for the project to adversely alter the existing operations of parks and recreational facilities. Websites from the following agencies were consulted for locations and general information regarding parks and recreation: Los Angeles County Department of Parks

and Recreation and DRP, including the Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment. Planning documents were reviewed for relevant plans, goals, and policies.

The analysis of parks and recreation facilities considers the increase in use that would be generated by the implementation of the FFTOD Specific Plan in relation to the ability of existing park and recreation facilities to meet that demand. The analysis considers whether an increase in use would result in the substantial physical deterioration of the facility, the construction or expansion of recreational facilities, or the need for new or expanded park and recreational facilities.

### 3.13.3.1 Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines and the County of Los Angeles Environmental Checklist, the project would have a significant impact on recreation if it would:

- 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
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

The following threshold related to parks is from Section 3.12, Public Services, in Appendix G of the CEQA Guidelines. The project would have a significant impact on parks if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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 following public services: parks.

The following threshold was scoped out of the analysis in the Initial Study (Appendix A), and is only described in Chapter 5, Other CEQA Considerations:

- Would the project interfere with regional trail connectivity?

## 3.13.4 Environmental Impacts

**REC-1:** *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

The FFTOD Specific Plan does not identify or propose any specific development or improvement projects, but implementation and buildout of the FFTOD Specific Plan would result in approximately 12,110 net new additional residential units and approximately 42,518 additional people and support a wide variety of housing types including townhomes, apartments, duplexes, triplexes, and fourplexes for multifamily density residences.

Los Angeles County Code Section 21.24.340 requires that the subdivider of a residential subdivision shall provide local park space to serve the subdivision, pay a fee in lieu of the provision of such park land in accordance with the provisions of Section 21.28.140, provide local park space

containing less than the required obligation but developed with amenities equal in value to the park fee, or do a combination of the above in accordance with the requirements of this title. According to the formula used for parkland obligation for residential subdivisions within PPA 23, Florence-Firestone, the parkland obligation for single-family residences is 0.01352 acres of parkland per unit, while multifamily residences are 0.01095 acres of parkland per unit for developments with two to four dwelling units and 0.00999 acres per unit for developments with 5 or more units (Table 3.13-2). Most of the proposed units would be multifamily residences because the FFTOD Specific Plan includes development standards and design guidelines appropriate for meeting the planned density and intensity established by the General Plan Land Use Designations; therefore, the parkland obligations of 0.01095 and 0.00999 acre per unit are used here. As such, buildout of the FFTOD Specific Plan would require dedication of approximately 129 to 141 acres of parkland. The parkland dedication can be in the form of parkland space, payment of in-lieu fees, or a combination thereof.

The existing parkland-to-population ratio is 1.2 acres of local parkland per 1,000 residents in the FFTOD Specific Plan Area (including the Augustus Hawkins Natural Park), far below the Los Angeles County goal standard of four acres per 1,000 residents. However, developers of residential units in the FFTOD Specific Plan Area would be required to provide the appropriate amount of parkland based on the proposed development size and allow public access to the parkland, or pay in-lieu fees that would go toward funding Los Angeles County acquisition of local park land or rehabilitation of existing recreational facilities. The FFTOD Specific Plan would also require developers provide publicly accessible open space based on the unit size of residential or mixed use developments for multi-family development. These requirements would provide adequate park land for the new developments and are as follows:

- Studio unit requires 125 square feet of open space
- 1 bedroom unit requires 150 square feet of open space
- 2 bedroom unit requires 200 square feet of open space
- 3+ bedroom unit requires 250 square feet open space

In addition, each residential or mixed use development shall be required to include public open space subject to the following standards for gross square feet (GSF) and gross floor area (GFA):

- < 80,000 GSF requires no open space
- 80,000 > 119,999 GSF requires 2% of GFA
- 120,000 > 159,999 GSF requires 3% of GFA
- 160,000 > 199,999 GSF requires 4% of GFA
- 160,000 > 199,999 GSF requires 5% of GFA

The FFTOD Specific Plan area is almost entirely built out with urban uses. There is very little vacant unincorporated land that could be developed as parkland to serve the Florence-Firestone community. The Quimby Act is a mechanism that can help to secure parkland and/or funding for improving existing and developing new parks in the Florence-Firestone community. As allowed by the Quimby Act and pursuant to the County Municipal Code, new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable Los Angeles County to maintain a ratio of three acres of local parkland for every 1,000 residents (Section 21.24.340). This provision ensures that when new residential subdivisions are developed,

there is an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific Plan and Los Angeles County Title 22. Therefore, the impact would be less than significant.

**REC-2:** *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

As analyzed in REC-1, it is likely that future developers of residential subdivisions in accordance with the FFTOD Specific Plan would pay in-lieu fees rather than provide new parkland to meet the Los Angeles County's local parkland standard, given the built-out nature of the FFTOD Specific Plan Area. In addition, there is no specific zone pertaining to park or open space use under the FFTOD Specific Plan. The FFTOD Specific Plan buildout would include pedestrian and bicycle infrastructure for mobility improvements. Pedestrian and bicycle infrastructure would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under the FFTOD Specific Plan. The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, the impact would be less than significant.

**REC-3:** *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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: Parks?*

As discussed above in REC-2, the FFTOD Specific Plan would not include development of new parks nor the physical alteration of existing parks. Buildout of the FFTOD Specific Plan would result in a net increase of 12,110 additional residential units that would house approximately 42,518 additional persons, thereby increasing demand for park services in the service area. Florence-Firestone has a very high park need and the five parks in the FFTOD Specific Plan Area need improvements. The parkland to population ratio is 1.2 acres of local parkland per 1,000 residents and below the Los Angeles County standard. Therefore, additional service demands caused by buildout would intensify the conditions and service deficits of the parks. Therefore, any new residential projects developed under the FFTOD Specific Plan would be required to fulfill parkland obligations to provide local park space and/or pay park facilities mitigation fees to Los Angeles County. Use of such fees for construction of new and/or expanded park facilities would reduce project impacts on park facilities. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific Plan. Therefore, the impact would be less than significant.

## 3.13.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.13.6 Level of Significance after Mitigation

Impacts would be less than significant.

## 3.13.7 Cumulative Impacts

The area considered for cumulative impacts to parks and recreational facilities is the FFTOD Specific Plan Area. Buildout of the FFTOD Specific Plan would result in a net increase of 12,110 additional residential units that would house approximately 42,518 additional people. Based on the Los Angeles County's local parkland standard of four acres per 1,000 residents, the FFTOD Specific Plan Area would need a total of approximately 428 acres of local parkland. Currently, there are 78.8 acres of local parkland.

The extent to which Los Angeles County can implement parks, trails, and other recreational facilities is related to the availability of funding for land acquisition, construction, operations, maintenance, and programming. The Quimby Act is a mechanism to secure parkland and/or funding for improving existing and developing new parks. As allowed by the Quimby Act and pursuant to the Los Angeles County Municipal Code, new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable Los Angeles County to maintain a ratio of 3 acres of local parkland for every 1,000 residents (Section 21.24.340). This provision ensures that when new residential subdivisions are developed, there is an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. Other regulations—including the Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972—help to ensure funding for the improvement of existing parks and the development of new parks in Florence-Firestone which is identified as a Very High need area in the Countywide Parks Needs Assessment. Additionally, per General Plan Policy P/R 3.3, Los Angeles County strives to provide additional parks in communities with insufficient local parkland. Los Angeles County may require a subdivider to dedicate land to meet the Los Angeles County 2035 General Plan goal of 4 acres of local parkland per 1,000 residents in unincorporated areas (Los Angeles County 2011). Enforcement of the goal of 4 acres of local parkland, for every 1,000 residents as a condition of approval where an appropriate nexus exists would serve to reduce the potential for deterioration of facilities by allowing for adequate funding. Adherence to Los Angeles County Municipal Code Section 21.24.340 and the County's continued implementation of park improvement and development projects in Florence-Firestone would ensure that the adequate amount of parkland would be available in the future. Therefore, existing regulations ensure that future funding for parkland acquisition would be proportional to increases in population and cumulative impacts would be less than significant.

## 3.13.8 References

Los Angeles County Department of Parks and Recreation (DPR). 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment Final Report, 2016, available at: https://lacountyparkneeds.org/final-report/, accessed March 1, 2021.

Los Angeles Countywide Parks & Recreation Needs Assessment. 2020. Parks within the Florence-Firestone area. available at: http://lacountyparkneeds.org/, accessed March 1, 2021.

Los Angeles County Department of Regional Planning, 2015. Los Angeles County General Plan 2035, Parks and Recreation Element, available at: https://planning.lacounty.gov/assets/upl/project/ gp_final-general-plan-ch10.pdf, accessed March 1, 2021.

Yom, Julie, AICP (Park Planner). 2021, June 3. Written response to service questionnaire. County of Los Angeles Department of Parks and Recreation.

# 3.14 TRANSPORTATION

This section provides an overview of the existing and potential future transportation and mobility conditions in the project area relative to the required areas of analysis to identify transportation impacts. As required by the Los Angeles County Public Works *Transportation Impact Analysis Guidelines* (July 23, 2020), this section provides analysis and discussion of the metrics, thresholds, and impacts that are relevant to the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan).

## 3.14.1 Environmental Setting

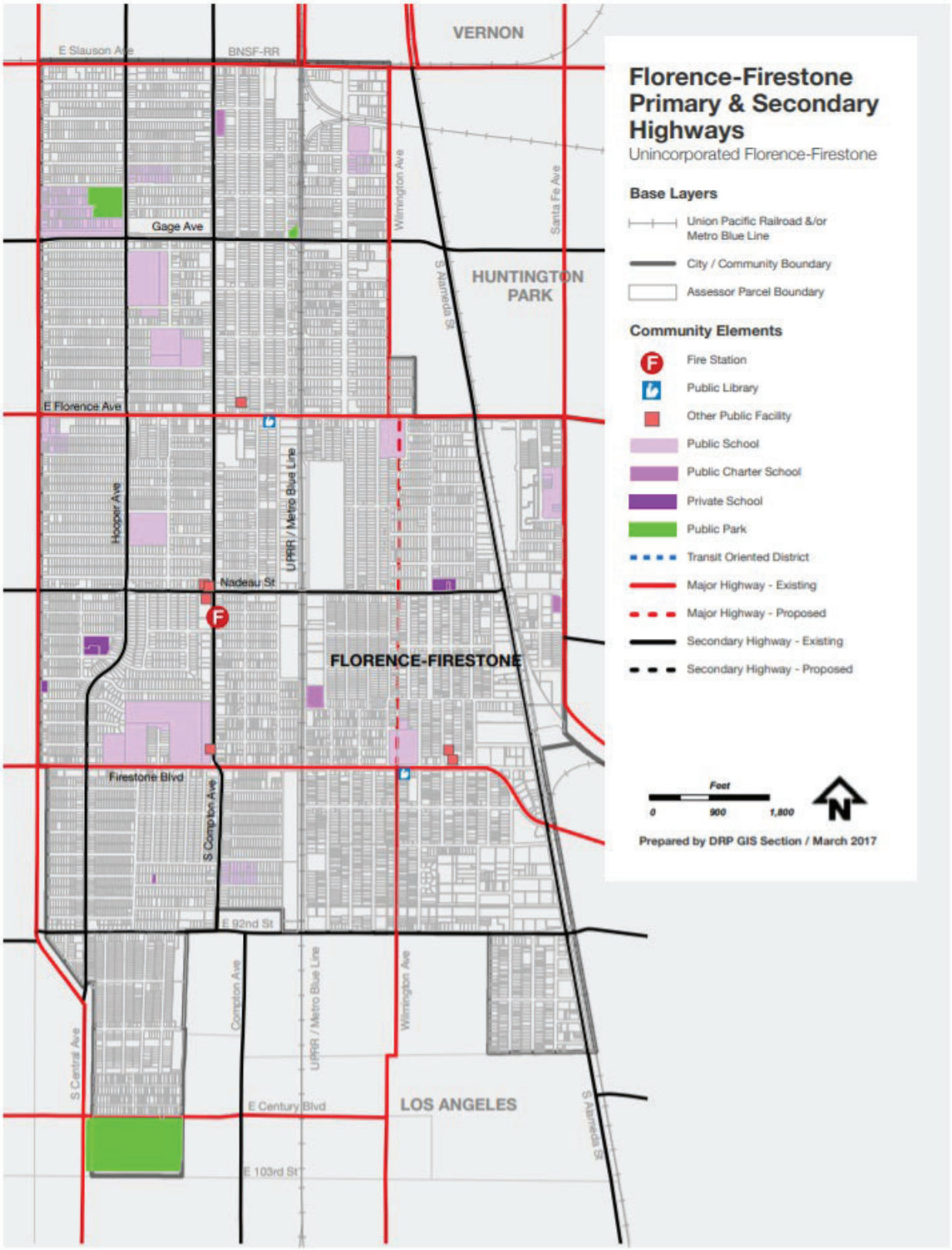
The FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west. The City of Huntington Park, the City of South Gate, and the unincorporated community of Walnut Park are to the east of the FFTOD Specific Plan Area. The LA Metro A Line (previously LA Metro Blue Line), which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations) and operates numerous bus routes in the community. Three freeways (I-110, I-105, I-10) are within a 2.5-mile radius of the community.

Four major arterials are responsible for the movement of most personal and commercial vehicles, trucks, transit vehicles, and pedestrians: Slauson Avenue, Florence Avenue, Firestone Boulevard, and Compton Avenue. Primary and Secondary Highways withing the FFTOD Specific Plan Area are shown in Figure 3.14-1.

Although the community is well-connected by public transit, the FFTOD Specific Plan Area is characterized by a challenging environment for travel across all modes: high vehicle speeds, lack of sufficient pedestrian and bicycle infrastructure, bus stops that lack sufficient amenities like benches and shelters, and degraded pavement quality along some streets. The area lacks an overall cohesive walking network, with large blocks and few protected crossings, while the LA Metro Rail Line creates a mostly impermeable north/south barrier. The miles of bicycle infrastructure are also below average for Los Angeles County.

Slauson Avenue, Florence Avenue, Firestone Boulevard, and Compton Avenue exhibit “hotspot” collision patterns. Vehicle collisions compose the majority of all collisions occurring in the study area. Vehicle collisions have generally been trending upward, from 95 in 2014 to 163 in 2017, decreasing slightly to 149 in 2018. Pedestrian collisions with vehicles have also trended upward over the same period, peaking at 38 in 2016 before decreasing to 32 in 2018. Bicycle collisions with vehicles fell from 28 in 2014 to 18 in 2016, before increasing again to 29 in 2018. Of these collisions, the number resulting in fatalities or severe injuries, known as killed or seriously injured (KSI) collisions, have comprised about 10% of total collisions each year, with an over-representation of pedestrian KSI collisions. Total KSIs in the study area fell from 12 in 2014 to 8 each in 2015 and 2016 before rising to 15 in 2017 and 14 in 2018.

**Figure 3.14-1: FFTOD Specific Plan Area Primary and Secondary Highways**




Source: Los Angeles County Department of Regional Planning, Florence-Firestone Community Plan, September 2019.

Opportunities to cross major arterials on foot and connections across the LA Metro A (Blue) Line itself are limited and may be contributing to the historical pedestrian collision patterns that have been observed in the study area. In particular, the spacing between crosswalks and signalized crosswalks at intersections varies between 600 and 1,250 feet, which makes pedestrian crossings on major arterials like Compton Avenue difficult for pedestrians in that corridor. Many sidewalks are as narrow as 6 feet and constrained by walls, without on-street parking or any other buffer between pedestrians and vehicle traffic.

Transit service is present throughout the study area, but headways are long, particularly in off-peak periods. There are 10 LA Metro Transit lines that serve the study area (lines 53, 55, 60, 102, 108, 110, 111, 115, 251, 611), in addition to three rail transit stations on the LA Metro A (Blue) Line (Firestone Station, Florence Station, and Slauson Station). Changes due to LA Metro's NextGen Bus Plan will increase frequencies on the routes with the highest ridership, including the 108 and 60. All other routes will see no change or lower frequencies. Lines 254 and 612 were discontinued in December 2020 due to low ridership, while line 751 was merged with line 251. In addition to LA Metro service, Los Angeles County Public Works provides shuttle service through the study area via the Link – Florence-Firestone/Walnut Park route, which operates on 60-minute headways.

**Table 3.14-1: LA Metro Bus Routes and Headways**

| Route | Route Description | Weekday Hours | Weekend Hours | Current Bus Frequency | | NextGen Bus Frequency | |
|---|---|---|---|---|---|---|---|
| | | | | a.m. | p.m. | a.m. | p.m. |
| LA Metro A (Blue) Line | Downtown LA – Long Beach | 3 a.m. to 1 a.m. | 3 a.m. to 1 a.m. | 7 | 7 | No change | |
| 53 | Downtown LA – California State University Dominguez Hills via Central Ave | 4 a.m. to 1 a.m. | 4 a.m. to 1 a.m. | 14 | 9 | 10 | 10 |
| 55 | Downtown LA – Willowbrook Station via Compton Ave | 24 hours | 24 hours | 17 | 10 | 12 | 12 |
| 60 | Downtown LA – Artesia Station via Long Beach Blvd | 24 hours | 24 hours | 9 | 6 | 5 | 5 |
| 102 | LAX City Bus Center – South Gate via La Tijera-Exposition | 5 a.m. to 12 a.m. | 5 a.m. to 12 a.m. | 35 | 37 | 40 | 40 |
| 108 | Marina Del Rey – Pico Riviera via Slauson Ave | 4 a.m. to 11 p.m. | 5 a.m. to 11 p.m. | 14 | 16 | 7.5 | 7.5 |
| 110 | Playa Vista – Bell Gardens via Jefferson Blvd-Gage Ave | 5 a.m. to 12 a.m. | 5 a.m. to 12am | 18 | 12 | 15 | 15 |
| 111 | LAX City Bus Center – Norwalk Station via Florence Ave | 24 hours | 24 hours | 9 | 10 | 13 | 13 |
| 115 | Playa Del Rey – Norwalk via Manchester-Firestone | 4 a.m. to 12 a.m. | 5 a.m. to 12 a.m. | 13 | 10 | 12 | 12 |
| 251 | Cypress Park – Long Beach Blvd C Line Station via Soto St | 24 hours | 24 hours | 9 | 9 | 10 | 10 |
| 611 | Huntington Park Shuttle | 5 a.m. to 10 p.m. | 5 a.m. to 10 p.m. | 46 | 49 | 60 | 60 |

Source: LA Metro (2020) and FFTOD Specific Plan Mobility & Equity Study (2020).

Compared to other parts of Los Angeles County, socioeconomic conditions in the study area (such as household income) seem to be influencing vehicle ownership and use. The FFTOD Specific Plan Area has higher rates of households that lack access to a vehicle and lower rates of personal vehicle use for some types of trips. In addition, the Mobility and Equity Study conducted as part of the FFTOD Specific Plan identified a high risk of displacement in the study area due to the following factors (compared to Los Angeles County overall):

- High proportion of renters
- High proportion of low and medium income households
- Large household sizes
- Large population of Hispanic/Latinx residents
- Lower educational attainment
- Higher risk of employment fluctuation due to the COVID-19 pandemic

Lack of low-cost, safe, and reliable transportation options can exacerbate displacement risks by limiting one's ability to access jobs and opportunity. Reliance on vehicles may result in trade-offs between transportation, housing, food, and utility costs. Improvements to low-cost, reliable transportation options can directly increase access to jobs and opportunities and can indirectly support greater financial stability in a household by reducing the need to make difficult tradeoffs with limited available income.

## 3.14.2 Regulatory Setting and Regional/Local Advisory Documents

### Federal

#### *Americans with Disabilities Act of 1990*

Titles I, II, III, and V of the Americans with Disabilities Act have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and nonprofit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

### State

#### *Complete Streets Act*

Assembly Bill 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties to ensure that plans account for the needs of all roadway users when updating the part of a local general plan that addresses roadways and traffic flows. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces "complete streets" as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

Complete Streets: Integrating the Transportation System Caltrans enacted Complete Streets: Integrating the Transportation System in October 2008, which required cities to plan for a "balanced, multimodal transportation network that meets the needs of all users of streets" (Caltrans 2014) A complete street is a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility. Every complete street looks different, according to its context, community preferences, the types of road users, and their needs.

### *Statewide Transportation Improvement Program*

Caltrans administers transportation programming for the State. Transportation programming is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The Statewide Transportation Improvement Program is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other sources.

### *Senate Bill 743*

Senate Bill (SB) 743 directs the Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service. On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. These changes will include elimination of auto delay, level of service, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Further, parking impacts are not considered significant impacts on the environment for particular types of development projects within certain infill areas with nearby frequent transit service. According to the legislative intent in SB 743, these changes to current practice were necessary to "…more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, an update to Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743, which had been released August 6, 2014.

In November 2017, OPR submitted the final guidelines to the Natural Resources Agency. The subsequent "rulemaking" process took just over 1 year, with the guidelines certified and adopted in December 2018. SB 743 will now go into effect, with agencies having an opt-in period until July 1, 2020.

### *Assembly Bill 32 and Senate Bill 375 (SB 375)*

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (California ARB) is coordinating the response to comply with AB 32.

On December 11, 2008, California ARB adopted its Proposed Scoping Plan for AB 32. This scoping plan included the approval of SB 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every 8 years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within 3 years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments also qualify if they: 1) are at least 50 percent residential; 2) meet density requirements; and 3) are within 0.5-mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission. Regional transportation planning agencies, cities, and counties are encouraged—but not required—to use travel demand models consistent with the California Transportation Commission guidelines.

### *California Vehicle Code*

The California Vehicle Code provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

## Regional

### *LA Metro 2020 Long-Range Transportation Plan*

The LA Metro 2020 Long-Range Transportation Plan includes funding for specific projects under four main categories (Transit Investments, Highway Investments, Active Transportation, and Equity Focus) that Call for Project Applications can be submitted under for projects in Los Angeles County. These investments are based on the expected sales tax revenue. The document predicts a potential 81 percent increase in daily transit trips and a 31 percent decrease in traffic delay. LA Metro also has a Short-Range Transportation Plan (SRTP), published in 2014, to define the near-term (through year 2024) transportation priorities in Los Angeles County. In addition to the regional transportation plans, LA Metro adopted both a Complete Streets Policy and a First Last Mile Strategic Plan in 2014 (described below).

### *LA Metro Complete Streets Policy*

LA Metro's recently adopted Complete Streets Policy is reinforcing the California Complete Streets Act (AB 1358). Effective January 1, 2017, LA Metro is requiring that all local jurisdictions within Los Angeles County adopt a Complete Streets Policy, an adopted resolution supporting complete streets, or an adopted general plan consistent with the California Complete Streets Act of 2008 in order to be eligible for LA Metro capital grant funding programs, starting with the 2017 grant cycles.

### *LA Metro Short Range Transportation Plan*

The 2014 LA Metro SRTP is a 10-year action plan that guides future LA Metro programs and projects through 2024 and advances LA Metro toward the long-term goals identified in the 2009 LA Metro Long-Range Transportation Plan. The SRTP identifies the short-term challenges, provides an analysis of financial resources, proposes action plans for the public transportation and highway modes, and includes other project and program initiatives. In addition, it addresses sustainability, future funding strategies, and lastly, measures the STRP's performance (Los Angeles Transportation Authority 2014).

### *LA Metro Blue Line First/Last Mile Plan*

LA Metro's Blue Line First/Last Mile Plan is a first-of-its-kind first/last mile plan for all 22 stations on the LA Metro Blue Line (now A Line) and was developed in partnership with a coalition of community-based organizations. The plan describes the community and historical context along the A (Blue) Line corridor, including a broad range of issues surfaced through community engagement and among the project team. The plan also identifies pedestrian and bicycle infrastructure improvements recommended for the areas around the stations and describes steps to move recommended infrastructure improvements through funding, design, and construction phases, largely focusing on coordination with local jurisdictions along the A (Blue) Line corridor.

### *LA Metro NextGen Bus Plan*

The NextGen Bus Plan is the first comprehensive look at LA Metro's fixed-route network in over 25 years. The plan was developed through consideration of both technical data and all the priorities and personal experiences from nearly 20,000 Los Angeles County residents. The process yielded

thousands of comments and input from the public, including local stakeholder groups, riders, and agencies; that input was used to develop the NextGen Bus Plan. On October 22, 2020, the LA Metro Board of Directors approved the plan, moving it forward for implementation starting in December 2020. The final plan nearly doubles the number of routes operating every 5 to 10 minutes, greatly expands service on evenings and weekends, and improves travel times by reducing delay and increasing operating speeds. It also combines most overlapping rapid and local lines into single enhanced bus services with better frequencies. The number of residents within walking distance of 5 to 10 minute service will more than double from 900,000 to 2.2 million.

### *LA Metro West Santa Ana Branch Project*

LA Metro is evaluating a new light rail transit line that will connect southeast Los Angeles County to downtown Los Angeles. The West Santa Ana Branch Transit Corridor project is a 19-mile corridor that will serve the cities and communities of Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, unincorporated Florence-Graham community and downtown Los Angeles. The project is undergoing an Environmental Impact Statement / Environmental Impact Report (EIR) process to prepare the corridor for light rail transit.

### *LA Metro Slauson Active Transportation Corridor (Rail to Rail)*

The Rail to Rail Project will convert an existing, underused railroad right-of-way into a multi-purpose pedestrian and bicycle transportation corridor on the western end of the corridor and create connections to the Los Angeles River on the eastern end of the corridor. The project will provide a pedestrian and bicycle corridor that will connect the cities of Los Angeles, Inglewood, Huntington Park, Vernon, Maywood, Bell, and parts of unincorporated Los Angeles County. The project area is largely composed of a mix of high-density neighborhoods, commercial centers, and industrial uses. The project is a single pedestrian and bicycle corridor composed of two distinct segments, each in a different phase of development. Segment A is the Rail to Rail component and Segment B is the Rail to River component. Together, they will form one path stretching from South Los Angeles to the Los Angeles River.

### *Southern California Association of Governments Regional Transportation Plan and Sustainable Communities Strategy and Regional Transportation Improvement Program*

The Southern California Association of Governments (SCAG) develops the Regional Transportation Plan (RTP), which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura counties. SB 375 was enacted to reduce GHG emissions from motor vehicles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, SCAG is tasked with developing an SCS, an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. The SCS outlines the plan for integrating 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 SCS focuses the majority of new housing and job growth in high quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern

supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The 2016 RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area (SCAG 2016). The Regional Transportation Improvement Programs, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements within the next 5 to 7 years. To qualify for CEQA streamlining benefits under SB 375, a project must be consistent with the RTP/SCS.

The 2020–2045 RTP/SCS, also known as Connect SoCal, is a long-range visioning plan that builds on and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020). The SCAG Regional Council adopted Connect SoCal on September 3, 2020.

## Local

### *Florence-Firestone Community Plan*

The Florence-Firestone Community Plan is a long-range, comprehensive plan for the unincorporated community of Florence-Firestone. The plan is an outgrowth of a visioning process conducted in 2009, which yielded a vision document based on community feedback. The community plan is based on the framework established in the vision plan and includes specific goals, policies, and implementation actions to guide future development and maintenance in the community. The community plan was recommended for approval to the board of supervisors by the Regional Planning Commission on November 15, 2017. The board of supervisors held their public hearing on February 27, 2018 and indicated their intent to approve the project. The board adopted the project on September 3, 2019.

### *County of Los Angeles General Plan 2035*

The County of Los Angeles General Plan 2035 provides the policy framework for how and where the unincorporated Los Angeles County will grow through the year 2035, while recognizing and celebrating Los Angeles County's wide diversity of cultures, abundant natural resources, and status as an international economic center. Comprising approximately 2,650 square miles, unincorporated Los Angeles County is home to over 1 million people. The plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in Los Angeles County and the region. The plan was adopted by the board of supervisors on October 6, 2015.

### *Los Angeles County Bicycle Master Plan*

The 2012 Bicycle Master Plan is a sub-element of the Mobility Element of the County's General Plan; it replaced the 1975 Plan of Bikeways. As an adopted regional planning document, the Bicycle Master Plan guides the Bikeways Unit in implementing proposed bikeways as well as

various bicycle-friendly policies and programs to promote bicycle ridership amongst users of all ages and skill sets in Los Angeles County. The Bicycle Master Plan proposes implementation of approximately 831 miles of new bikeways throughout Los Angeles County through 2032.

### *Los Angeles County Transit Oriented District Toolkit*

In order to prepare for as many as five additional rail stations throughout unincorporated areas of Los Angeles County as well as additional stations in the future, Los Angeles County developed the Transit Oriented District (TOD) Toolkit (formerly known as TOD Guidelines). The TOD Toolkit provides a framework for a consistent approach to public infrastructure and transportation-related improvements to support land-use decisions in areas within a 0.5-mile radius of the stations.

The TOD Toolkit helps ensure that public infrastructure improvements support land use plans by facilitating both public and private investment in affordable housing and transit-friendly development. It will identify enhancements that the community needs and supports, that market forces, and potential funding mechanisms encourage.

### *OurCounty Sustainability Plan*

OurCounty is a regional sustainability plan for Los Angeles. The plan outlines what local governments and stakeholders can do to enhance the well-being of every community in Los Angeles County while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution. This plan envisions streets and parks that are accessible, safe, and welcoming to everyone; air, water, and soil that are clean and healthy; affordable housing that enables all residents to thrive in place; and a just economy that runs on renewable energy instead of fossil fuels.

### *Los Angeles County Safety Element (in progress)*

The Safety Element, a chapter of the General Plan, contains goals and policies to reduce the potential short- and long-term risk of death, injuries, property damage, economic damage, and social dislocation from earthquakes, floods, and fire in Los Angeles County's unincorporated areas. The Department of Regional Planning is updating the Safety Element to also incorporate climate adaptation and resiliency strategies, as required by California Senate Bill 379. The Safety Element Update will be developed with community input, climate adaptation, and resiliency strategies to fulfill this mandate.

### *Step by Step Pedestrian Plan (Los Angeles County Department of Public Health) (in progress)*

The Step by Step Plan provides a policy framework for how Los Angeles County proposes to get more people walking, make walking safer, and support healthy active lifestyles. It also includes Community Pedestrian Plans for unincorporated communities in Los Angeles County. The current version of the plan was adopted by the board of supervisors in 2019, and included Community Pedestrian Plans for unincorporated Lake Los Angeles, Walnut Park, Westmont/West Athens, and Whittier-Los Nietos. These first four communities were selected based on criteria including high rates of pedestrian collisions resulting in death or injury, as well as a focus on disadvantaged communities that experience health inequities and challenges to safe walking and access.

From 2020 to 2023, the PLACE Program will be collaborating with neighborhood organizations, mobility advocates, and resident leaders to develop four new Community Pedestrian Plans for the unincorporated neighborhoods of East Los Angeles, East Rancho Dominguez, Florence-Firestone, and Willowbrook/West Rancho Dominguez-Victoria. Work on this next round of Community Pedestrian Plans will last from winter 2021 through fall 2023.

### *Los Angeles County Climate Action Plan (in progress)*

The 2020 Community Climate Action Plan describes Los Angeles County's plan to reduce the impacts of climate change by reducing GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. Los Angeles County's existing Community Climate Action Plan document was adopted by the board of supervisors in 2015 as a component of the Los Angeles County General Plan 2035; it expired in 2020 and will be replaced by the in progress Climate Action Plan (CAP). The CAP will tie together existing climate change initiatives and provide a blueprint for deep carbon reductions. Through this updated CAP, Los Angeles County is targeting carbon neutrality by 2045 in unincorporated Los Angeles County.

The CAP will outline actions that Los Angeles County plans to take to reduce GHG emissions and adapt to a changing climate in unincorporated areas. The CAP will include a GHG inventory and a roadmap for addressing emissions from stationary energy (used by buildings and other facilities), transportation, waste, industrial, agricultural, and land use sectors. Mitigation measures identified in the plan will also yield community co-benefits, including improvements in air quality, public health, mobility, and resilience. The CAP will be aligned with the General Plan as well as OurCounty, the countywide sustainability plan, to support decision-makers in delivering climate compatible solutions in unincorporated Los Angeles County.

## 3.14.3 Methodology

Per Los Angeles County guidance, a vehicle miles traveled (VMT) assessment of the full FFTOD Specific Plan Area has been conducted. For the FFTOD Specific Plan, daily vehicle trips, daily VMT, and daily total VMT per service population were estimated using the SCAG 2016 RTP/SCS Travel Demand Forecast Model. The socioeconomic data assumptions for the FFTOD Specific Plan Area required for VMT modeling as well as the assumptions and methodology for setting certain input parameters necessary to analyze the project using the model are provided in Appendix F. FFTOD Specific Plan mobility strategies and other transportation demand management strategies are included as project design features, but the Travel Demand Forecast Model is not sensitive to these improvements (including pedestrian crossing improvements, bike facility improvements, wayfinding improvements, and other types of multimodal improvements); therefore, the VMT estimates do not reflect the actual VMT reduction benefits they may have. Daily total VMT per service population has been compared to the South County Baseline interpolated to the year of the Notice of Preparation (2020).

### Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would have a significant impact on transportation if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
    - Text of CEQA Guidelines Section 15064.3, Subdivision (b):
        - **Land Use Projects.** Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
        - **Transportation Projects.** Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.
        - **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
        - **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.
    - Per the metrics and thresholds established in the Los Angeles County Public Works Transportation Impact Analysis Guidelines (July 23, 2020), the FFTOD Specific Plan would have an impact related to transportation if the daily total VMT per service population estimated for the horizon year (the "Future Plus Project" scenario) exceeds Los Angeles County's threshold of 16.8 percent below the South County Baseline VMT for 2020. The South County Baseline VMT for the Daily VMT per Service Population metric for 2012 and 2020, as well as the threshold set at 16.8 percent below the baseline are provided in Table 3.14-2.

**Table 3.14-2: South County VMT Metrics and Thresholds**

| | 2012 Baseline | 16.8% Below 2012 Baseline | 2020 Baseline | 16.8% Below 2020 Baseline |
|---|---|---|---|---|
| Total Daily VMT per Service Population | 31.1 | 25.9 | 30.2 | 25.1 |

Notes:
VMT = vehicle miles traveled
Source: Los Angeles County Transportation Impact Analysis Guidelines (July 23, 2020) and Los Angeles County Baseline VMT Data Memorandum (January 14, 2021)

- Per the metrics and thresholds established in the Los Angeles County Public Works Transportation Impact Analysis Guidelines (July 23, 2020), a significant cumulative impact would occur if the FFTOD Specific Plan total VMT or total VMT per service population exceeds the 2035 "No Project" scenario.

3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) through design for on-site circulation or access driveways that fail to meet Los Angeles County's design guidelines.
4. Result in inadequate emergency access.

## 3.14.4 Environmental Impacts

**TRA-1:** *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

The FFTOD Specific Plan is anticipated to be consistent with policies, plans, ordinances, and programs addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths, as described in the Regulatory Setting section. In addition to this review, further discussion related to key guiding policy documents is provided below. Connect SoCal (the SCAG RTP/SCS), the Florence-Firestone Community Plan (FFCP), the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County are described in more detail and specificity due to the role they play in setting the long-term direction of land use development and transportation in the region and for this local community.

### Consistency with Connect SoCal, the SCAG RTP/SCS

As part of 2020-2045 RTP/SCS (Connect SoCal), SCAG prepared the Regional Growth Forecast, which provides a set of socioeconomic projections. Categorized by county and city, the report includes historical data from 2016, and projections of population, housing, and employment for 2045. The socioeconomic estimates and projections in the Growth Forecast are used for federal- and state-mandated long-range planning efforts, such as the RTP, the Air Quality Management Plan, the Regional Transportation Improvement Program, and the Regional Housing Needs Assessment. The estimates also provide guidance to local governments in planning for jobs and housing.

The intent of the FFTOD Specific Plan is to create a land use and zoning policy tool focused on the Florence-Firestone community that would provide more opportunities for affordable housing, encourage TOD, promote active transportation, improve access to transit, reduce vehicles miles

traveled by cars, and streamline the environmental review of future development projects. The socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan Area include higher densities and more growth than is assumed in Connect SoCal (consistent with its goals for focusing higher-density development in transit-rich areas), the FFTOD Specific Plan is consistent with the transportation-related goals and policies of Connect SoCal, and the FFTOD Specific Plan does not conflict with anything related to the circulation system.

Mobility is an important component of sustainability and integrated planning in Connect SoCal. The FFTOD Specific Plan would be consistent with the policy framework and goals of Connect SoCal. The overall goals of Connect SoCal are to:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase people and goods movement and travel choices in the transportation system
5. Reduce GHG emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage TOD, promote active transportation, improve access to transit, reduce vehicles miles traveled by cars, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. As such, the FFTOD Specific Plan would be consistent with and would not conflict with SCAG's regional planning goals and policies.

### Consistency with the Florence-Firestone Community Plan

The FFCP is policy document to guide the future development, conservation, and maintenance of the Florence-Firestone community, which includes the FFTOD Specific Plan Area. The Community Plan articulates a vision and provides goals and policies to guide land use decisions made by property owners, developers, planners, businesses, agencies, and others toward that vision. The FFCP provides goals and policies to promote a comprehensive transit system, such as:

- Goal CN-2—The pedestrian and bicycle networks in Florence-Firestone are comprehensive, accessible, safe, pleasant to use, clearly demarcated, and connective to activity centers.
    - Policy CN-2.1—Pedestrian Connections. Increase and improve pedestrian connections around the Slauson, Florence, and Firestone transit stations through the implementation of limited street parking available on a residential street in Florence-Firestone, active transportation infrastructure, such as crosswalks, widened sidewalks, pedestrian-scale street lighting, wayfinding signage, street trees, shade structures, and other elements as needed and where appropriate.

  - Policy CN-2.4—Bicycle Amenities. Increase convenient and safe bicycle use in Florence-Firestone by installing bicycle racks and lockers along major corridors and at locations with high levels of bicycle traffic, such as schools, parks, businesses, mixed-use housing, and transit hubs.

- Goal CN-3—Streets and sidewalks meet the needs of pedestrians, bicyclists, transit users, and motorists.
  - Policy CN-3.4—Circulation Efficiency. Monitor the Florence-Firestone circulation system to ensure that travel across modes is efficient and properly connective.
- Goal CN-4—Parking throughout the community is adequate, compliant with all applicable regulations, and is connective to other transportation modes.
  - Policy CN-4.3—TOD Parking Requirements. Reduce parking requirements for projects within the TODs and support strategies to allow alternative parking proximate to transit centers, such as underused vacant lots.

### Consistency with the Los Angeles County General Plan Mobility Element

The General Plan Mobility Element includes goals, policies, and programs aimed at providing a multimodal transportation system that promotes walkability and connectivity throughout the unincorporated areas of Los Angeles County, including interconnected and safe bicycle and pedestrian-friendly facilities that promote active transportation and transit use. The General Plan also includes elements that support alternative transportation programs, such as increasing ridership on public transit and developing public transit as an alternative to motor vehicle travel. Implementation of the FFTOD Specific Plan would be subject to and implement General Plan policies applicable to the circulation system (County of Los Angeles 2015).

The General Plan outlines a number of policies related to mobility issues such as complete streets, active transportation, and land use and transportation:

- Policy M 1.1—Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.
- Policy M 1.2—Ensure that streets are safe for sensitive users, such as seniors and children.
- Policy M 2.1—Provide transportation corridors/networks that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible.
- Policy M 2.9—Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features.
- Policy M 2.10—Encourage the provision of amenities, such as benches, shelters, secure bicycle storage, and street furniture; and comfortable, safe waiting areas near transit stops.
- Policy M 2.11—In urban and suburban areas, promote the continuity of streets and sidewalks through design features, such as limiting mid-block curb cuts, encouraging access through side streets or alleys, and promoting shorter block lengths.

The FFTOD Specific Plan proposes transportation improvements to improve vehicle, transit, bicycle, and pedestrian access and connections, as well as parking improvements. This is consistent with the overall aim of the FFCP and General Plan to achieve a transportation system that balances the needs of all road users.

### Consistency with the Bicycle Master Plan

The Bicycle Master Plan contains elements that support alternative transportation programs, including increasing ridership on public transit, developing mass transit as an alternative to motor vehicle travel, developing rail transit or exclusive bus lanes in high demand corridors, and researching and developing new transportation technologies (Los Angeles County 2012). The FFTOD Specific Plan would support alternative modes of transportation—including walking and bicycling—to reduce total VMT. Los Angeles County will provide safe and convenient access to transit, bikeways, and walkways; consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems; provide safe pedestrian connections across barriers, such as major traffic corridors, rail corridors, and grade separations; and, prioritize direct pedestrian access between building entrances, sidewalks, and transit stops in the development review process. The Bicycle Master Plan also includes many programs and policies that would mitigate potential hazards or barriers for bicyclists (Los Angeles County 2012).

### Step by Step Los Angeles County: Pedestrian Plan for Unincorporated Communities

Step by Step Los Angeles County provides a policy framework for how Los Angeles County proposes to get more people walking, make walking safer, and support healthy active lifestyles (County of Los Angeles Department of Public Health 2019). Implementation of the FFTOD Specific Plan would be subject to and consistent with goals regarding safe streets, making walking easy and healthy, improving connectivity, equity, safe communities, sustainability, and preservation.

### Los Angeles County Metropolitan Transportation Authority

The FFTOD Specific Plan would not preclude LA Metro from implementing any major transit, active transportation, operations, capital improvement and highway projects, nor conflict with existing programs and policies or new policies and initiative required to achieve its regional goals.

Overall, the FFTOD Specific Plan would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, including public transit, roadway, bicycle, or pedestrian facilities. This impact would be less than significant.

**TRA-2:** *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

The changes included in the FFTOD Specific Plan will improve mobility for households that lack access to a vehicle and create safer conditions for all modes of transportation. In addition, the changes included in the FFTOD Specific Plan will enable the study area to accommodate more residents, employees, and visitors traveling by transit, on foot, or by bike.

Per the Los Angeles County Transportation Impact Analysis Guidelines (July 23, 2020), the FFTOD Specific Plan would have an impact if it results in average daily VMT per service population in the horizon year (2035) that exceeds 16.8 percent below the South County Baseline daily VMT per service population for 2020. The FFTOD Specific Plan Scenario was analyzed as described above under Methodology using the SCAG 2016 RTP/SCS Travel Demand Forecast Model. The results of the model analysis for the FFTOD Specific Plan area are provided in Table 3.14-3.

**Table 3.14-3: FFTOD Specific Plan Area Model Results**

| | Total Population | Total Employment | Total Service Population | Total Daily VMT | Total Daily VMT per Service Population |
|---|---|---|---|---|---|
| | (A) | (B) | (C)=(A)+(B) | (D) | (E)=(D)/(C) |
| 2035 FFTOD Specific Plan Area | 100,423 | 11,408 | 111,831 | 2,270,604 | 20.3 |

Notes:
VMT = vehicle miles traveled
Source: SCAG 2016 RTP/SCS Travel Demand Forecast Model.

Based on the results of the model analysis, the FFTOD Specific Plan scenario would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline. The results of the model analysis are compared to the 2020 South County Baseline and the 2020 South County Threshold (16.8 percent below the baseline), provided in Table 3.14-4.

**Table 3.14-4: FFTOD Specific Plan Area VMT Metrics**

| | 2020 South County Baseline | 2020 South County VMT Threshold (16.8% Below 2020 South County Baseline) | 2035 FFTOD Specific Plan Area | Percent Difference between Baseline & Specific Plan |
|---|---|---|---|---|
| Total Daily VMT per Service Population | 30.2 | 25.1 | 20.3 | -33% |

Notes:
VMT = vehicle miles traveled
Source: Los Angeles County Transportation Impact Analysis Guidelines (July 23, 2020), Los Angeles County Baseline VMT Data Memorandum (January 14, 2021), and SCAG 2016 RTP/SCS Travel Demand Forecast Model.

The study area demonstrates relative efficiency in terms of daily VMT per service population, compared to the Los Angeles County's South County Planning Area. The changes included in the FFTOD Specific Plan will further expand the ability for residents and employees to walk, bike, and take transit to complete the trips they need to make, resulting in greater VMT efficiency in terms of daily VMT per service population. These transportation and mobility improvements are included as project design features, but the Travel Demand Forecast Model is not sensitive to these improvements and therefore the VMT estimates do not reflect the actual VMT reduction benefits they may have.

Overall, the FFTOD Specific Plan would not conflict with CEQA Guidelines section 15064.3, subdivision (b) related to VMT thresholds. This impact would be less than significant.

**TRA-3:** *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 FFTOD Specific Plan does not propose any new roads or intersections. None of the transportation system improvements envisioned in the FFTOD Specific Plan would introduce new safety hazards or incompatible uses at intersections or along roadway segments, because most would be designed to improve safe circulation and access to the transit stations for all users. The multimodal improvements envisioned in the FFTOD Specific Plan Area are intended to help minimize conflicts between pedestrians and vehicles. These strategies include:

- Traffic calming measures, such as curb extensions, speed bumps, and neighborhood traffic circles, which will encourage safer vehicle speeds
- Bicycle facilities, such as bicycle lanes and bicycle parking, which will separate bicycle and vehicle traffic
- Pedestrian enhancements, such as high-visibility crosswalks and pedestrian-activated warning beacons, which are easier to see and alert drivers that they are approaching a pedestrian crossing

In addition, any new transportation facilities or improvements to facilities associated with the FFTOD Specific Plan would be constructed based on environmental analysis as well as future engineering review consistent with applicable Los Angeles County guidelines and practices, including—but not limited to—the California Manual on Uniform Traffic Control Devices, Caltrans Highway Design Manual, Los Angeles County Municipal Code, and best practices consistent with the Los Angeles County General Plan. Approval of the FFTOD Specific Plan as a policy document would not provide any goals, policies, or programs that substantially increase hazards in the area.

At the project-level through Site Access Studies, specific considerations will be made around compliance with all relevant transportation design standards, Los Angeles County guidance, and Los Angeles County codes; driveway locations and sight distances; and whether additional infrastructure or intersection controls are needed (e.g., crosswalks, signals). These Site Access Studies will ensure that no new hazards due to geometric design features or incompatible uses are introduced.

Overall, the FFTOD Specific Plan would not substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant.

**TRA-4:** *Would the project result in inadequate emergency access?*

The FFTOD Specific Plan does not include any standards that would result in inadequate emergency access. At the FFTOD Specific Plan level, individual project design level details—such as location of driveway location and design—are unknown. Therefore, the Draft EIR does not consider impacts to emergency access to particular properties in the FFTOD Specific Plan Area or particular streets based on roadway configurations. The FFTOD Specific Plan would allow for greater densities than are currently allowed within this study area. For the FFTOD Specific Plan Area, Los Angeles County will maintain a current evacuation plan; ensure that new and infill development is provided with adequate emergency and/or secondary access; require visible street

name signage; and provide directional signage to freeways at key intersections to assist in emergency evacuation operations.

In addition, Los Angeles County and responsible emergency service agencies including the Los Angeles County Fire Department have emergency access and design standards that are based on the size and intensity of development. At the project level, design would meet all applicable emergency access and design standards and adequate emergency access would be provided. Compliance with these provisions would be ensured through the review process by Los Angeles County and emergency service agencies. Site Access Studies submitted for development projects to the Los Angeles County Public Works would ensure that adequate emergency access to the development projects within the FFTOD Specific Plan Area is maintained.

It is possible that during the construction phase of transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access to and within the FFTOD Specific Plan Area. Final transportation and mobility improvements are not anticipated to result in inadequate emergency access, and any effects on emergency access would be temporary in nature.

Similarly, future development pursuant to implementation of the FFTOD Specific Plan would also require construction for future projects, which may result in construction traffic that could impede emergency access to and within the FFTOD Specific Plan Area. However, this impediment would also be temporary.

Overall, the FFTOD Specific Plan would not result in inadequate emergency access. Impacts would be less than significant.

## 3.14.5 Programmatic Mitigation Measures

No programmatic mitigation measures are required.

## 3.14.6 Level of Significance After Mitigation

No programmatic mitigation measures are required. Impacts would be less than significant.

## 3.14.7 Cumulative Impacts

Per the Los Angeles County Public Works Transportation Impact Analysis Guidelines (July 23, 2020), both short- and long-term effects on VMT should be considered. Long-term, cumulative effects are determined through consistency with the SCAG RTP/SCS, because that plan demonstrates compliance with air quality conformity requirements and GHG reduction targets. Per the Guidelines, land use plans that: 1) demonstrate a project impact after applying an efficiency based VMT threshold; and 2) are not deemed to be consistent with the SCAG RTP/SCS, could have a significant cumulative impact on VMT. Los Angeles County has determined both criteria must be met to have a significant cumulative impact.

Although the FFTOD Specific Plan reflects greater density and intensity than are assumed in the SCAG RTP/SCS for this study area, because the VMT impact analysis above demonstrates no project impact after applying an efficiency-based VMT threshold, no further cumulative analysis is required and the project is not expected to result in a cumulative VMT impact. Because this

study area is more efficient compared to the South County Planning Area in terms of VMT per service population, adding population and employment to this area instead of other, less efficient parts of the South County Planning Area would help to reduce VMT over time.

The FFTOD Specific Plan would not result in a cumulative impact on VMT. Significant cumulative impacts have not been identified; therefore, mitigation is not required.

## 3.14.8 References

Caltrans. 2014. Implementation Policy of Complete Streets: Integrating the Transportation System, available at: http://www.dot.ca.gov/hq/tpp/offices/ocp/complete_streets.html, accessed on July 2021.

Los Angeles County Public Works. 2012. Bicycle Master Plan. Available at: https://pw.lacounty.gov/tpp/bike/masterplan.cfm, accessed on July 2021.

County of Los Angeles Department of Public Health. 2019. Step by Step Los Angeles County. Available at: http://www.publichealth.lacounty.gov/place/stepbystep/lacounty.htm, accessed on July 2021.

LA Metro. 2014. 2014 Short Range Transportation Plan. Available at: https://media.metro.net/projects_studies/srtp/report_srtp_2014.pdf, accessed on July 2021.

# 3.15 TRIBAL CULTURAL RESOURCES

This section evaluates the potential for implementation of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) to impact tribal cultural resources in the Florence-Firestone community. Tribal cultural resources can include—but are not limited to—archaeological resources, rock art, and the prominent topographical areas, features, habitats, plants, animals, and minerals that contemporary Native Americans value and consider essential for the preservation of their traditional values. These locations are sometimes difficult to define and traditional culture often prohibits Native Americans from sharing these locations with the public. Other potential impacts to cultural resources (i.e., historic, archaeological, and paleontological resources) are evaluated in Section 3.3, Cultural Resources. The analysis in this section is based in part on the Cultural Resources Technical Report (Appendix C).

## 3.15.1 Environmental Setting

### 3.15.1.1 Natural Setting

The FFTOD Specific Plan Area is in the southern part of the Transverse Range Geomorphic Province in the Los Angeles Basin, which is about 50 miles long and 20 miles wide. The basin is bound on the north by the Santa Monica Mountains and the Elysian, Repetto, and Puente Hills, and on the east and southeast by the Santa Ana Mountains and San Joaquin Hills. The basin's low land surface slopes gently south or seaward toward the Pacific Ocean, but it is interrupted by the Coyote Hills near the northeast margin, by a line of elongated low hills and mesas to the south and west that extends from Newport Bay northwest to Beverly Hills, and by the Palos Verdes peninsula at the southwest extremity. The basin sediment consists of alluvium deposited over millions of years. The entire FFTOD Specific Plan Area is mapped as Quaternary alluvium (Qa). This geologic unit consists of unconsolidated alluvial gravel, sand, and clay mostly eroded from the Santa Monica Mountains and deposited by the Los Angeles River and its tributaries (Dibblee and Minch 2007; Jennings 1962).

Older Quaternary alluvial deposits are anticipated to exist below the younger Quaternary alluvium at unknown depths. These deposits are not easily differentiated from the recent deposits that overlie them. Undisturbed older Quaternary alluvial deposits have yielded significant fossils throughout the Los Angeles Basin, including microfossils and fossil megafauna. Older Quaternary alluvial deposits close to the surface are typically considered of low sensitivity for significant fossils due to chemical and mechanical weathering, bioturbation, and anthropogenic disturbances; however, the sensitivity of undisturbed older Quaternary alluvial deposits for significant fossils—even at moderate depths—is considered moderate to high and increases with depth.

### 3.15.1.2 Tribal Cultural Setting

The FFTOD Specific Plan Area is in the present-day Los Angeles Basin, which is associated with the traditional territory of the prehistoric and protohistoric Native American populations generally referred to as the Gabrieleno/Tongva. The Gabrieleno/Tongva society is identified by Late Prehistoric/Protohistoric ethnographic records, and archaeological data identify Late Prehistoric occupation of Southern California. The term Gabrieleno refers to Native American populations that were under the jurisdiction of the Mission San Gabriel de Archangel. Mission San Gabriel serviced the entire Los Angeles Basin and into the San Bernardino area. The present-day city of

Los Angeles is somewhat centrally situated in the ethnographic boundaries for the Gabrieleno, and the core area of the Los Angeles Basin was the site of the historical city of Los Angeles and the ethnographic village of Yangna. Following the founding of the Pueblo de Los Angeles, a large Catholic church (Church of Our Lady the Queen of the Angels) was constructed to service the small but sedentary population of the pueblo, including Native Americans and early European settlers (primarily Spanish/Mexican, but also many others). Evidence of the prehistoric occupation of the area, including the village of Yangna, has been sporadically identified, and the native populations became known as Gabrielenos. The FFTOD Specific Plan Area is in the southern areas of Gabrieleno territory (DRP 2018).

As described in Section 3.3, Cultural Resources, FFTOD Specific Plan Area has a variety of historical resources and cultural resources that require further evaluation. A records search was conducted for the project at the South Central Coastal Information Center (see Section 3.3 for details). As a result of that records search, five previously recorded resources that meet the eligibility requirements to make them eligible for inclusion in the CRHR (and therefore historical resources for the purposes of California Environmental Quality Act [CEQA]) have been identified in the FFTOD Specific Plan Area: the National Register of Historic Places (NRHP) eligible Miramonte Elementary School (P-19-176186); the Union Pacific Railroad (P-19-186110); the Mojave Road, which is a California Registered Historical Landmark # 963; the Boulder Dam – Los Angeles 287.5kV Transmission Line (P-19-188983); and the Paul R. Williams / Parkside Manor Historic District (P-19-190949). These resources are described below.

- **Miramonte Elementary School (P-19-176186):** The Miramonte Elementary School main building and auditorium were identified for their architectural significance in 1996 (P-19-176186). The buildings were constructed in 1936 and 1937 in the Mediterranean revival style designed by the architectural firm Howell and Winslow. The resource is eligible for the NRHP and is listed in the California Register of Historical Resources (CRHR).
- **Union Pacific Railroad (P-19-186110):** The Union Pacific Railroad was constructed between 1869 and 1905 and includes portions of the first transcontinental railroad. It is significant for its association with the development of Los Angeles (P-19-186110). For a different project in 2019, the State Historic Preservation Officer recommended that the Union Pacific Railroad (P-19-186110) as a whole should be assumed eligible for the NRHP (Feldman 2019). The Union Pacific Railroad is assumed eligible for the NRHP.
- **Mojave Road (P-19-187085):** The NRHP-eligible Mojave Road (P-19-187085) is the historic road that connected the United States Army Headquarters for Southern California and Arizona Territory at Wilmington, California with Fort Mojave, Arizona (California Registered Historical Landmark #963). Within the FFTOD Specific Plan Area, the Mojave Road is generally along the alignment of the existing railroad.
- **Boulder Dam – Los Angeles 287.5kV Transmission Line (P-19-188983):** The Boulder Dam – Los Angeles 287.5 kV Transmission Line (P-19-188983) was evaluated for NRHP eligibility in 1999 and found eligible under Criteria A and C, significant for its association with the construction of Boulder Dam, as well as for its association with the industrial, economic, and urban development that occurred in metropolitan Los Angeles from the mid-1930s through the 1940s. The resource is also significant for its unique engineering and structural characteristics.

- **Paul R. Williams / Parkside Manor Historic District (P-19-190949):** The Paul R. Williams / Parkside Manor Historic District (P-19-190949) was constructed between 1944 and 1952. The resource was found eligible for listing in the NRHP under Criteria A and C at the local level of significance as a unique example of community planning in the Watts area, with residences designed by architect Paul R. Williams. The district is one of the first and only planned neighborhoods in the Watts area and was among the few developments in Los Angeles built to provide quality single-family housing for the Black community during World War II (HRG n.d.).

#### 3.15.1.3 Consultation Process

In accordance with Senate Bill (SB) 18 and Assembly Bill (AB) 52, Los Angeles County contacted the Native American Heritage Commission (NAHC) and inquired about the presence/absence of sacred or religious sites in the vicinity of the FFTOD Specific Plan Area. The NAHC responded that there are no known sacred lands within the FFTOD Specific Plan Area or a 0.5-mile radius and provided a list of AB 52-specific Native American tribes with traditional lands or cultural places within the boundaries of the FFTOD Specific Plan Area. These tribes include Soboba Band of Luiseno Indians, Gabrieleno Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Gabrieleno/Tongva Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrieleno Band of Mission Indians-Kizh Nation, Santa Rosa Band of Cahuilla Indians, and two contacts for the Fernandeno Tataviam Band of Mission Indians. On March 11, 2021, in compliance with CEQA and SB 18, Los Angeles County sent letters to the nine Native American contacts notifying them of the project and requesting comments or concerns for the FFTOD Specific Plan Area.

### 3.15.2 Regulatory Setting

#### 3.15.2.1 Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites that are on federal and Native American lands.

#### 3.15.2.2 Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants and culturally affiliated Native American tribes.

#### 3.15.2.3 State

#### California Public Resources Code

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code (PRC). In addition, cultural resources are recognized as a nonrenewable resource and therefore receive protection under the PRC and CEQA.

PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources and sacred sites, and identify the powers and duties of the Native American Heritage

Commission. It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

### California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code Section 7050.5, which states that:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation… until the coroner… has determined… that the remains are not subject to… provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible… The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and… has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

### California Senate Bill 18

Existing law provides limited protection for Native American prehistoric, archaeological, cultural, spiritual, and ceremonial places. These places may include sanctified cemeteries, religious and ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological or historic sites, Native American rock art inscriptions, or features of Native American historic, cultural, and sacred sites.

SB 18, which focuses on traditional tribal cultural places was signed into law in September 2004 and went into effect on March 1, 2005. It placed new requirements on local governments for the adoption, revision, amendment, or update of a city's or county's general plan within or near traditional tribal cultural places (TTCPs). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, the Final Tribal Guidelines advise that SB 18 requirements extend to specific plans as well, because state planning law requires local governments to use the same process for amendment or adoption of specific plans as general plans (defined in Government Code Section 65453).

SB 18 requires local jurisdictions to provide opportunities for involvement of California Native Americans tribes in the land planning process for the purpose of preserving traditional tribal cultural places. The Final Tribal Guidelines recommend that the NAHC provide written information as soon as possible—but no later than 30 days—after receiving notice of the project to inform the lead agency if the proposed project is determined to be in proximity to a TTCP, and another 90 days for tribes to respond to a local government if they want to consult with the local government to determine whether the project would have an adverse impact on the TTCP. There is no statutory limit on the consultation duration. Forty-five days before the action is publicly considered by the local government council, the local government refers action to agencies, following the CEQA public review time frame. The CEQA public distribution list may include tribes listed by the NAHC who have requested consultation or it may not. If the NAHC, the tribe,

and interested parties agree on the mitigation measures necessary for the proposed project, it would be included in the project's Environmental Impact Report. If both Los Angeles County and the tribe agree that adequate mitigation or preservation measures cannot be taken, then neither party is obligated to take action.

In addition, SB 18 provided a new definition of TTCP requiring a traditional association of the site with Native American traditional beliefs, cultural practices, or ceremonies, or the site must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. Previously, the site was defined to require only an association with traditional beliefs, practices, lifeways, and ceremonial activities. In addition, SB 18 law also amended Civil Code Section 815.3 and added California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

### Assembly Bill 52

Effective July 1, 2015, AB 52 requires inclusion of a new section in CEQA documents titled Tribal Cultural Resources, for projects where the Notice of Preparation or Notice to adopt a Negative Declaration or Mitigated Negative Declaration is filed after this date. Similar to SB 18, AB 52 requires consultation with tribes at an early stage (within 14 days of a lead agency deeming an application complete or deciding to undertake a project) to determine whether the project would have an adverse impact on tribal cultural resources and provide mitigation to protect them.

## 3.15.3 Methodology

The following analysis considers the existing environmental setting and regulatory environment applicable to the proposed FFTOD Specific Plan Area related to tribal cultural resources. Tribal cultural resources are defined by and in consultation with tribal representatives. The analysis is based on a sacred land files search, AB 52 consultation, and archival research.

### 3.15.3.1 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the Los Angeles County Environmental Checklist Form, the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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:

- Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); or
- 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

## 3.15.4 Environmental Impacts

**TCR-1:** *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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 listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)?*

**TCR-2:** *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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 PRC Section 5024.1?*

Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. The FFTOD Specific Plan would establish transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. While the project itself does not propose any new development, it would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three LA Metro A (Blue) Line Stations in the community (i.e., Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a TOD development pattern, which could impact existing historical resources within the FFTOD Specific Plan Area and its surroundings.

As described in Section 3.3, Cultural Resources, the FFTOD Specific Plan does not identify any specific development projects; therefore, it would not directly demolish or materially alter historical resources. However, identified historic structures and sites that are eligible or potentially eligible for NRHP listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources to the extent that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

Note that the five previously recorded historical resources identified within the FFTOD Specific Plan Area (Miramonte Elementary School; the Union Pacific Railroad; the Mojave Road; the Boulder Dam – Los Angeles 287.5kV Transmission Line; and the Paul R. Williams/ Parkside Manor Historic District), are all twentieth century creations/developments and therefore do not figure into the ethnographic and ethnohistoric literature related to the Gabrieleno. However, as

detailed above, the FFTOD Specific Plan Area is within the territory inhabited by Native Americans (Gabrieleno/Tongva) and may have sensitive tribal cultural resources.

Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review; identify and address potential adverse impacts to tribal cultural resources; and reduce the potential for delay and conflict in the environmental review process. In accordance with AB 52 and SB 18 requirements, Los Angeles County sent invitation letters to representatives of the nine Native American contacts provided by the NAHC on March 11, 2021, formally inviting tribes to consult with Los Angeles County on the project. The intent of the consultations is to provide an opportunity for interested Native American contacts to work with Los Angeles County during the project planning process to identify and protect tribal cultural resources. Los Angeles County received two responses via email: one response from the Fernandeno Tatavium Band of Mission Indians noted that the FFTOD Specific Plan Area is outside the Fernandeno Tatavium Band of Mission Indians ancestral Tribal boundaries and deferred consultation for the Project to members of the Gabrieleno Indian Tribe; the other response, from the Gabrieleno Band of Mission Indians – Kizh Nation, declined to consult at the time because no immediate ground disturbance would be taking place; however the tribal contact requested to be notified regarding ground disturbance of future development projects. No other tribes responded to Los Angeles County's notification letter.

There are no known tribal cultural resources in the FFTOD Specific Plan Area, but ground-disturbing activities have the potential to cause a substantial adverse change in the significance of tribal cultural resources of a California Native American tribe. Each future development project in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes (which would include follow up with the Gabrieleno Band of Mission Indians – Kizh Nation) (see Mitigation Measure CUL-2 in Section 3.3, Cultural Resources). Where significant impacts to tribal cultural resources are identified, future development projects would be required to either avoid impacts or implement feasible mitigation measures to reduce impacts.

In addition, as described in Section 3.3, Cultural Resources, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. Human burials have specific provisions for treatment in Section 5097 of the PRC, which authorizes the NAHC to resolve any disputes related to the disposition of Native American burials. PRC Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also has provisions protecting human burial remains from disturbance, vandalism, or destruction. California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation or to their authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the NAHC via phone within 24 hours.

## 3.15.5 Programmatic Mitigation Measures

Programmatic mitigation measures MM CUL-1 through MM CUL-3 from Section 3.3, Cultural Resources, would be applicable to impacts TCR-1 and TCR-2.

## 3.15.6 Level of Significance after Mitigation

The programmatic mitigation measures identified in Section 3.3, Cultural Resources, would reduce potentially significant impacts associated with tribal cultural resources to a level that is less than significant.

## 3.15.7 Cumulative Impacts

As described above, future development projects in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes. Programmatic mitigation measures MM CUL-1 through MM CUL-3 would reduce potentially significant impacts of the project related to tribal cultural resources to a level that is less than significant with mitigation incorporated. Other cumulative developments within the region would similarly be required to mitigate any impacts to historic and tribal cultural resources to a level that is less than significant, as well as consult with tribal representatives as required by AB 52; such impacts are not cumulatively considerable.

## 3.15.8 References

Dibblee, T.W., and J.A. Minch. 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24000 scale. Santa Barbara: Santa Barbara Museum of Natural History.

Historic Resources Group (HRG). n.d. DPR 523 Series Form for Paul R. Williams/ Parkside Manor Historic District (P-19-190949). Document on file at South Central Coastal Information Center, California State University, Fullerton.

Jennings, C.W. 1962. Geologic map of California: Long Beach sheet. 1:250000 scale. Sacramento: California Division of Mines and Geology.

Los Angeles County. 2017. Willowbrook Transit Oriented District Specific Plan, accessed on April 19, 2021.

Los Angeles County Department of Regional Planning (DRP). 2018. West Carson Transit Oriented District Specific Plan Draft EIR, accessed on April 19, 2021.

# 3.16 UTILITIES AND SERVICE SYSTEMS

The purpose of this section is to assess the potential impacts of buildout of the proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) on water supply and service, wastewater collection and treatment, stormwater drain systems, energy utility systems, and solid waste disposal capacity. This section is based on comparisons of existing and anticipated levels of service with buildout of the proposed FFTOD Specific Plan, and the ability to provide services to the net new development that would occur from the FFTOD Specific Plan, in addition to other service commitments. Because the California Environmental Quality Act evaluates potential impacts on the environment, the focus of this section is to determine if new or expanded infrastructure would need to be constructed as a result of implementation of the project, and if those improvements would result in a potential physical impact to the environment.

## 3.16.1 Environmental Setting

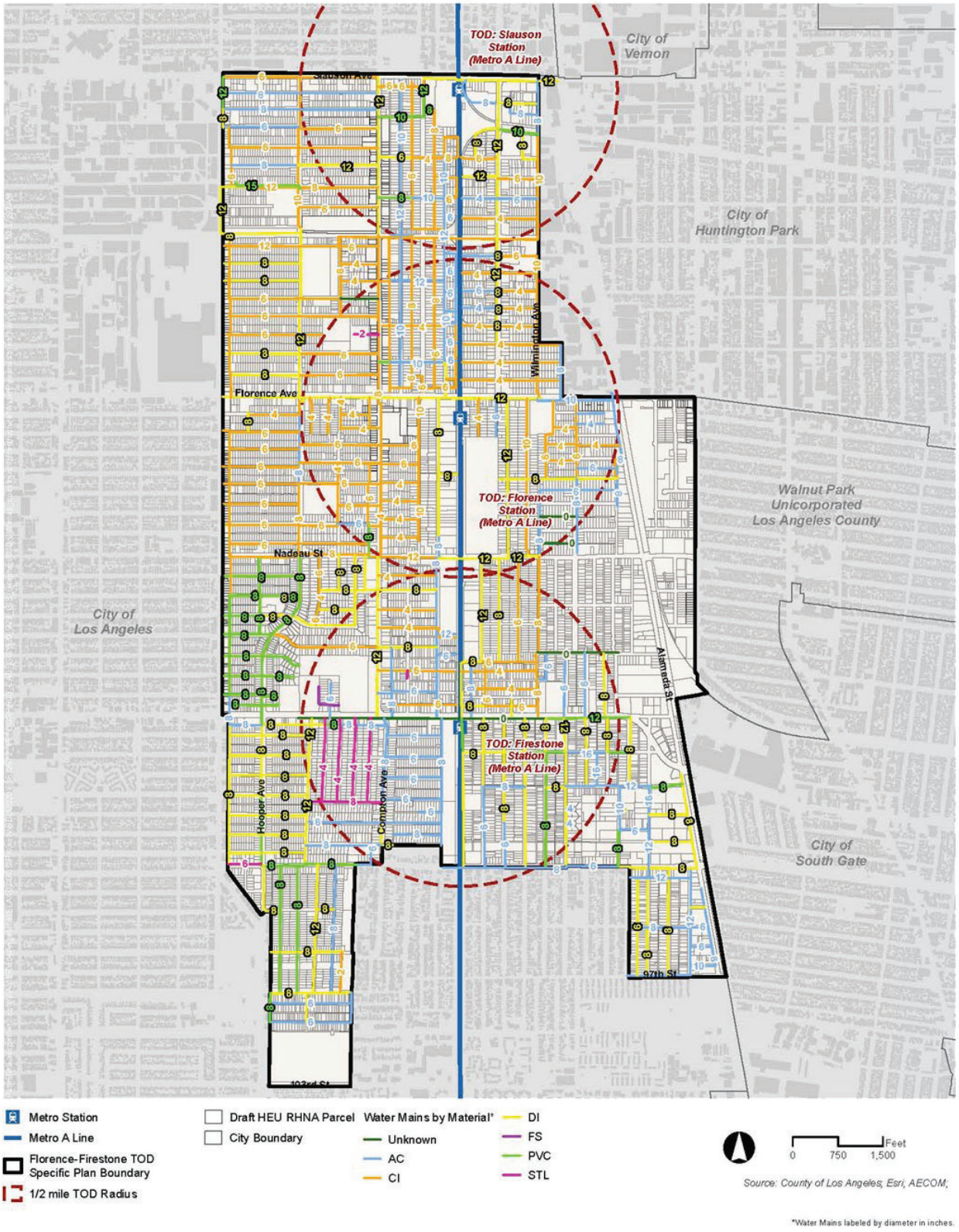
### *Water Service*

The FFTOD Specific Plan Area and Florence-Graham Water System customers are serviced with potable water by the Golden State Water Company (GSWC). This water is a blend of groundwater pumped from the Central Groundwater Basin and imported water from the Colorado River Aqueduct and the State Water Project, which imported and distributed by the Metropolitan Water District of Southern California. The Central Groundwater Basin is bounded on the north by the La Brea Uplift; on the east by the Elysian, Repetto, Merced and Puente hills; on the southeast by the Orange County Groundwater Basin; and on the west by the Newport-Inglewood Fault Zone (GSWC 2020).

The installed water system is constructed of mostly cast iron, ductile iron, and asbestos concrete pipes with sizes ranging from 2 inches to 16 inches. Pipes are in the public right-of-way under existing streets and alleyways. The layout of the existing water lines within the FFTOD Specific Plan Area is shown in Figure 3.16-1.

Recycled water systems would be owned and maintained by Central Basin Municipal Water District; however, recycled water pipelines are installed in the FFTOD Specific Plan Area. The closest recycled water pipelines to the FFTOD Specific Plan Area are approximately 1.16 miles east from Alameda Street on Slauson Avenue and 2.31 miles east of Alameda Street on Firestone Boulevard.

**Figure 3.16-1: Existing Water Systems**



### *Sewer Service*

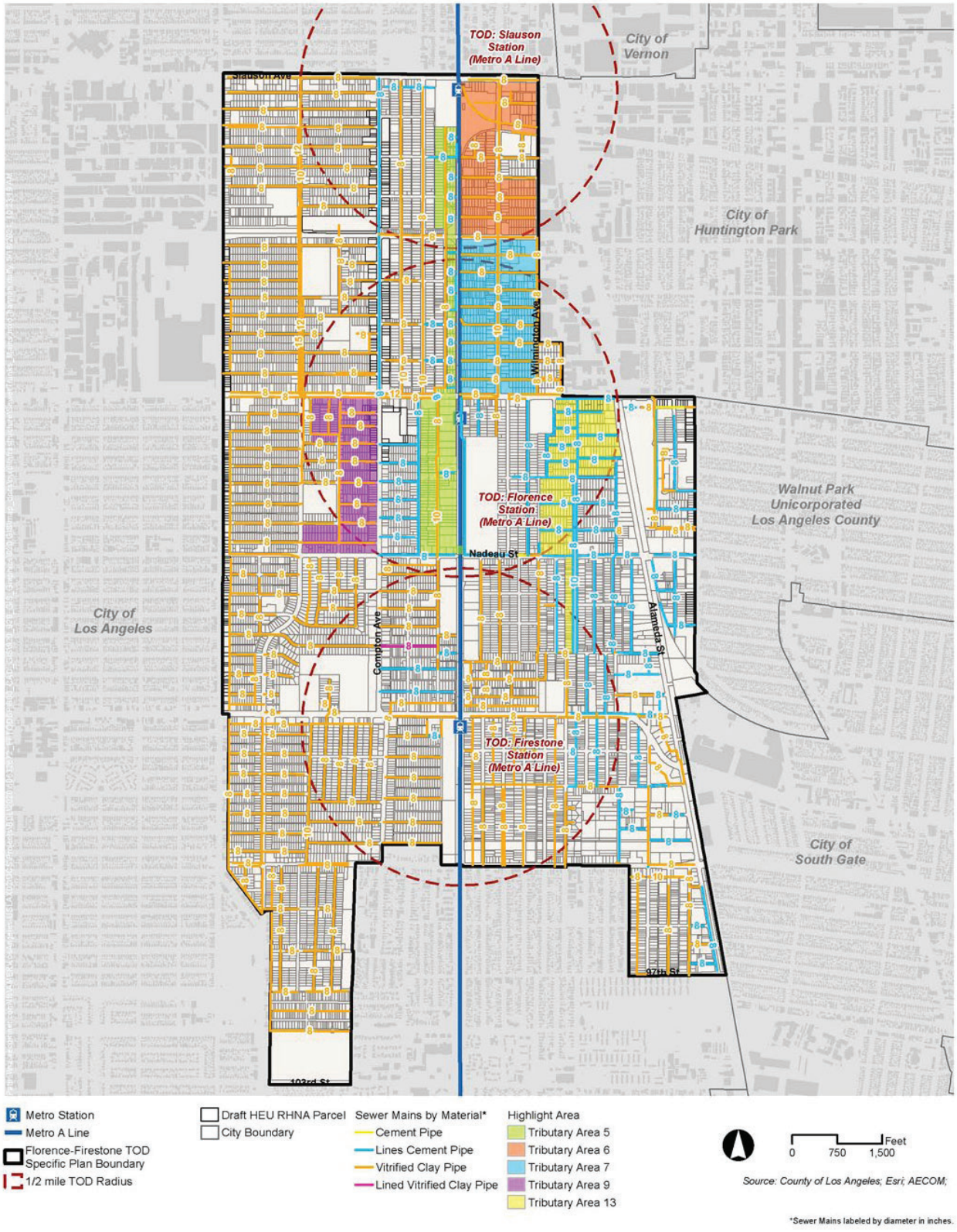
The existing sewer system (mains and laterals) is within the Consolidated Sewer Maintenance District (CSMD), which is owned and maintained by the Los Angeles County Public Works Sewer Maintenance Division (SMD). All mains and laterals empty into SMD-owned trunks. The County's trunk sewer lines are owned and maintained by Los Angeles County Sanitation District.

The existing gravity-fed sewer mains within the FFTOD Specific Plan Area are primarily 8-inch vitrified clay pipe (VCP) and lined cement pipe and include the majority of streets and some alleys—except for those otherwise identified below. Detailed locations are shown in Figure 3.16-2.

- North of Florence Avenue, some pipes are 10-inch, 12-inch, and 15-inch VCP, collecting from large systems of 8-inch VCP to carry to larger diameter trunks
- The Hooper Avenue trunk starting at E Florence Avenue, running south on Hooper Avenue to 92nd Street, Baird Avenue from 92nd Street and Zamora Avenue from 98th Street. This trunk continues under Ted Watkins Memorial Park and south of the FFTOD Specific Plan Area
- Compton Avenue trunk starting at E Florence Avenue, following Compton Avenue south of the FFTOD Specific Plan Area
- Two trunk lines starting at E Florence Avenue and Whitsett Avenue, flowing south, crossing through the southeast of the FFTOD Specific Plan Area, and continuing to the south

Wastewater from the FFTOD Specific Plan Area is collected and treated at the Joint Water Pollution Control Plant (JWPCP) in Carson. The JWPCP is in the city of Carson just east of the I-110 freeway. The plant provides primary and secondary treatment for approximately 280 million gallons per day and has a total permitted capacity of 400 million gallons per day serving a population of 3.5 million in Los Angeles County. Effluent from JWPCP is disinfected and discharged into the Pacific Ocean through a network of outfalls (LACSD 2021).

**Figure 3.16-2: Existing Sewer System**



### *Stormwater Service*

Stormwater in the fully developed Florence-Firestone urban area is managed by open channel flow in curbs and gutters along the roadways as the primary conveyance. The storm drainage system is a combination of public and privately maintained channels, including the majority of segments that are maintained by Los Angeles County Public Works within the Los Angeles County Flood Control District, a segment running along Nadeau Street east from Graham Avenue that is maintained by Los Angeles County Road Maintenance Division, and several drains in the area being maintained by private entities.

The entire system is gravity fed, reinforced concrete pipe from 18 inches to 90 inches, mostly 24 inches to 48 inches in diameter. Each branch empties into higher flow reinforced concrete boxes running under Hooper Avenue on the west side of the FFTOD Specific Plan Area and under Crockett Boulevard and Hickory Street on the east side, comprising the Hooper Avenue Drain and Glen Avenue Drain systems, respectively. Both drains empty into Compton Creek Upper before it empties into the Los Angeles River.

Stormwater flow is typically north to south in the FFTOD Specific Plan Area. West of Graham Avenue, the flow is from east to west along Florence Avenue, Nadeau Street, and Firestone Boulevard. East of Graham Avenue, the flow is west to east along same roads. Figure 3.16-3 shows the existing stormwater system for the FFTOD Specific Plan Area.

Green infrastructure and low-impact development (LID) are practices that contribute to stormwater quality control. These practices lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies and minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed drainage at their project sites. Los Angeles County Public Works maintains two documents to guide and require these practices: the LID Manual and the Green Infrastructure Guidelines.

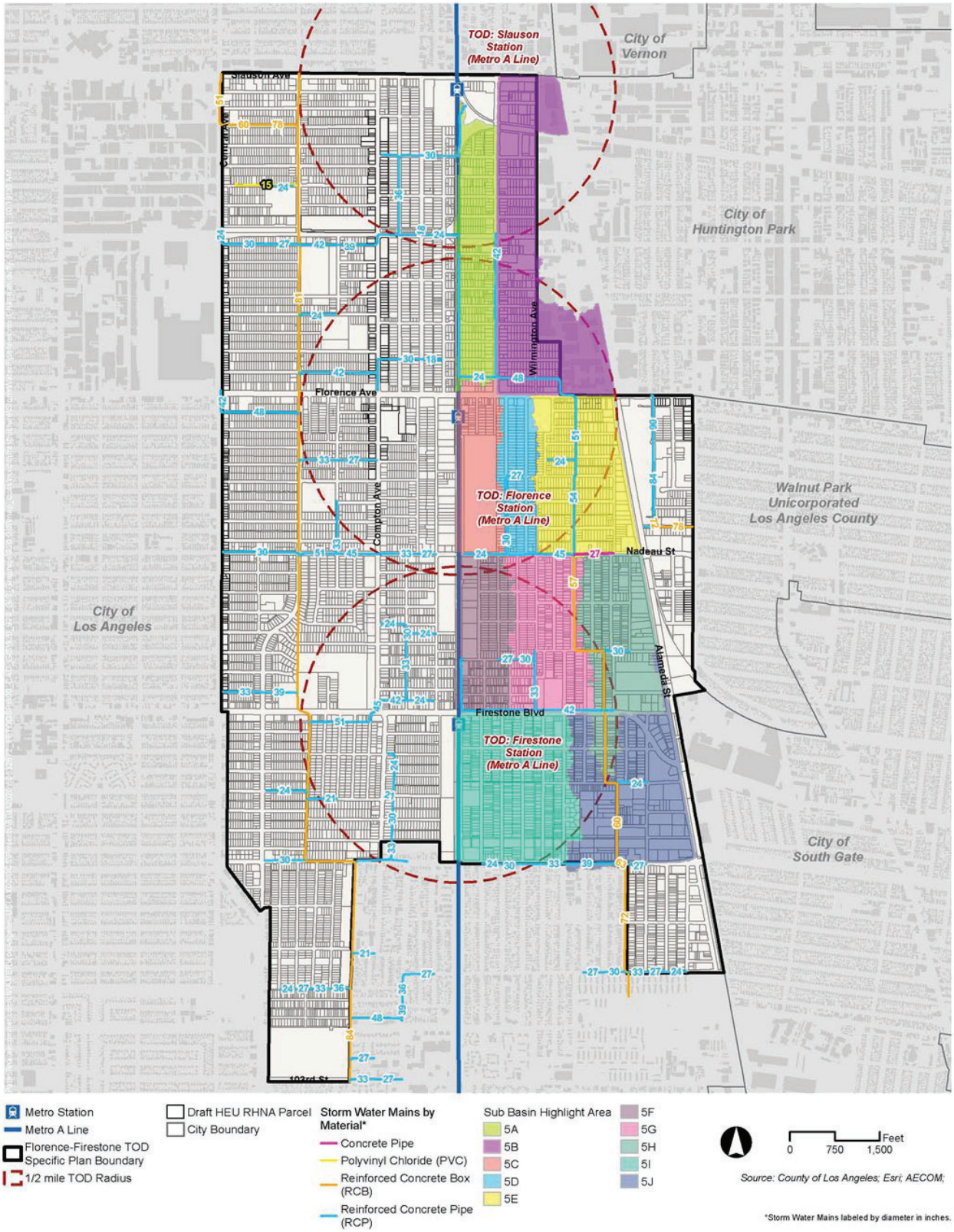
The LID Manual requires compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County. The Regional Water Quality Control Board (RWQCB) adopted the MS4 permit (Order No. R4-2012-0175) in December 2012, establishing LID requirements for all new development projects in nine different categories. The majority of anticipated new development under the FFTOD Specific Plan would qualify under these categories and be required to install LID features consistent with the LID Manual.

LID practices or stormwater quality control measures can be categorized into the following types:

- Retention-based stormwater quality control measures (e.g., bioretention, infiltration basin, dry well, permeable pavement)
- Biofiltration
- Vegetation-based stormwater quality control measures (e.g., stormwater planter [or planter box], vegetated swale, green roof)

The Green Infrastructure Guidelines provide guidance for new construction and reconstruction of road and flood projects. The goal of the guidelines is to incorporate sustainable practices into the

**Figure 3.16-3: Existing Stormwater System**



design, construction, and operation of Los Angeles County Public Works infrastructure. The guidelines provide LID design options to consider during planning or designing of road and flood projects intended to manage stormwater runoff.

All new development under the FFTOD Specific Plan must:

- demonstrate that site improvements do not introduce new flooding concerns upstream or downstream from the project
- submit LID and/or Storm Water Pollution Prevention Plans (SWPPPs), as required by the NPDES thresholds, to preservation of water quality and mitigation of environmental impacts
- incorporate best management practices, as appropriate to the project and parcel, consistent with the LID Manual and Green Infrastructure Guidelines

### *Solid Waste Management*

The FFTOD Specific Plan Area is in the Firestone Garbage Disposal District, serviced by Consolidated Disposal Service (Republic Services) under the commercial franchise system. The area disposes approximately 235 tons of waste per day.

Waste management is an increasingly challenging issue for urbanized areas as available space for landfills becomes more limited and increasing populations generate more waste. In 2014, the County Board of Supervisors adopted a Roadmap to a Sustainable Waste Management Future. This roadmap outlines the process by which Los Angeles County can implement strategies to reduce solid waste generation in unincorporated areas and through Los Angeles County operations. The Florence-Firestone community is part of this program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Permitted landfill capacity will be enough for the current volume of waste generated for at least the next 15 years. Increases in population and economic activity in Los Angeles County unincorporated areas will require jurisdictions to continue development of waste reduction and diversion efforts to avoid shortfalls in landfill capacity and to meet roadmap goals.

### *Electrical Service*

Electricity in the community is provided by Southern California Edison (SCE), a private franchise utility company and subsidiary of Sempra Energy. All standards, development requirements, and improvement strategies are set directly by SCE, with oversight by the California Public Utilities Commission (CPUC). Electricity is transmitted by a network of mostly above-ground power lines, with a few underground distribution facilities to supply sufficient power to all locations, including streetlights and traffic signals. The major east-west arteries like Slauson Avenue, Firestone Boulevard, and Florence Avenue are mostly free of overhead lines; lines serving these areas run through nearby alleyways. Areas free of full overhead power lines still have individual lines connecting to and powering streetlights and will be crossed by overhead lines on crossing roads and alleys. The existing electrical system has adequate capacity to serve the FFTOD Specific Plan Area. The existing electrical system is shown in Figure 3.16-4.

### *Natural Gas Service*

Southern California Gas Company is a private franchise utility company regulated by the CPUC that provides natural gas to the FFTOD Specific Plan Area. The Southern California Gas Company

owns and operates all transmission mains, distribution pipelines, and service laterals in the community. The existing natural gas system is shown in Figure 3.16-5.

#### *Telecommunication and Cable Service*

AT&T, a private franchise utility company, provides local and long-distance telecommunication services and Asymmetric Digital Subscriber Line internet services in the FFTOD Specific Plan Area. Services are provided primarily on above-ground lines shared with the electric provider. Currently there are no fiber optic installations in the FFTOD Specific Plan Area. Spectrum provides cable and internet services to every parcel in the FFTOD Specific Plan Area. Spectrum will share joint trenches with electrical and AT&T if electrical is undergrounded. SCE will determine the layout of underground conduit facilities and AT&T and Spectrum will follow at their own expense. Various wireless carriers provide services in the FFTOD Specific Plan Area.

## 3.16.2 Regulatory Setting

### Federal

#### *Safe Drinking Water Act*

The Safe Drinking Water Act (Public Law 93–523) regulates the quality of drinking water in the United States (U.S.). The law requires actions to protect drinking water and its sources—rivers, lakes, reservoirs, springs, and groundwater wells—and applies to public water systems serving 25 or more people. It authorizes the U.S. Environmental Protection Agency (EPA) to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants. In addition, it oversees the states, municipalities, and water suppliers that implement the standards.

EPA standards are developed as a Maximum Contaminant Level (MCL) for each chemical or microbe. The MCL is the concentration that is not anticipated to produce adverse health effects after a lifetime of exposure, based upon toxicity data and risk assessment principles. The EPA's goal in setting MCLs is to ensure that even small violations for a period of time do not pose significant risk to the public's health over the long run. National Primary Drinking Water Regulations (or primary standards) are legally enforceable standards that limit the levels of contaminants in drinking water supplied by public water systems.

Secondary standards are nonenforceable guidelines regulating contaminants that may cause cosmetic effects (e.g., skin or tooth discoloration) or aesthetic effects (e.g., taste, odor, or color) in drinking water. The EPA recommends secondary standards to water systems but does not require systems to comply. However, states may choose to adopt them as enforceable standards.

In July 2014, implementation of the Safe Drinking Water Act was transferred from the California Department of Public Health to State Water Resources Control Board (SWRCB), Division of Drinking Water (DDW). DDW now oversees the operational permitting and regulatory oversight of public water systems. DDW requires public water systems to perform routine monitoring for regulated contaminants that may be present in their drinking water supply. To meet water quality standards and comply with regulations, a water system with a contaminant exceeding an MCL must notify the public and remove the source from service or initiate a process and schedule to install treatment for removing the contaminant. Health violations occur when the contaminant

**Figure 3.16-4: Existing Electrical System**

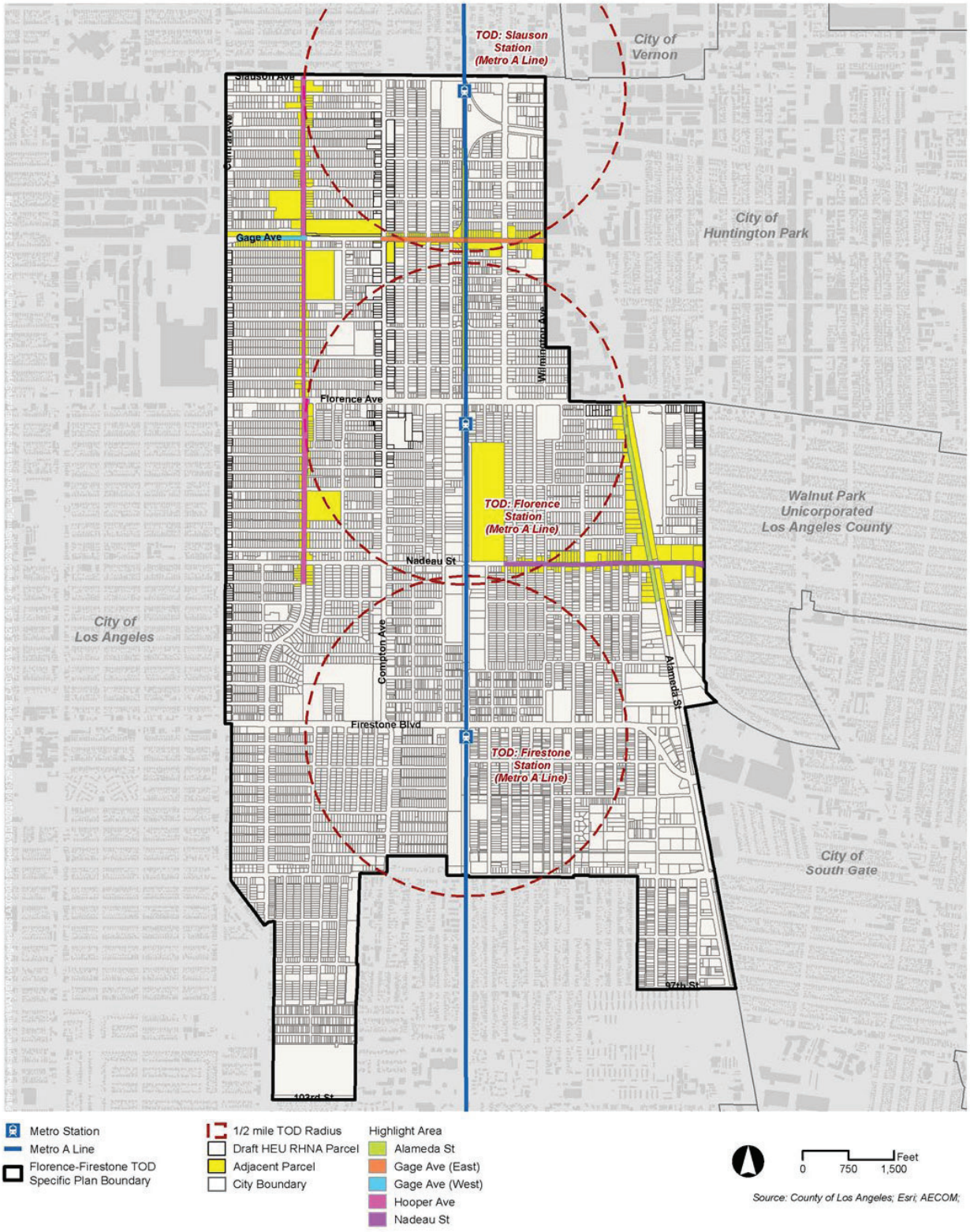
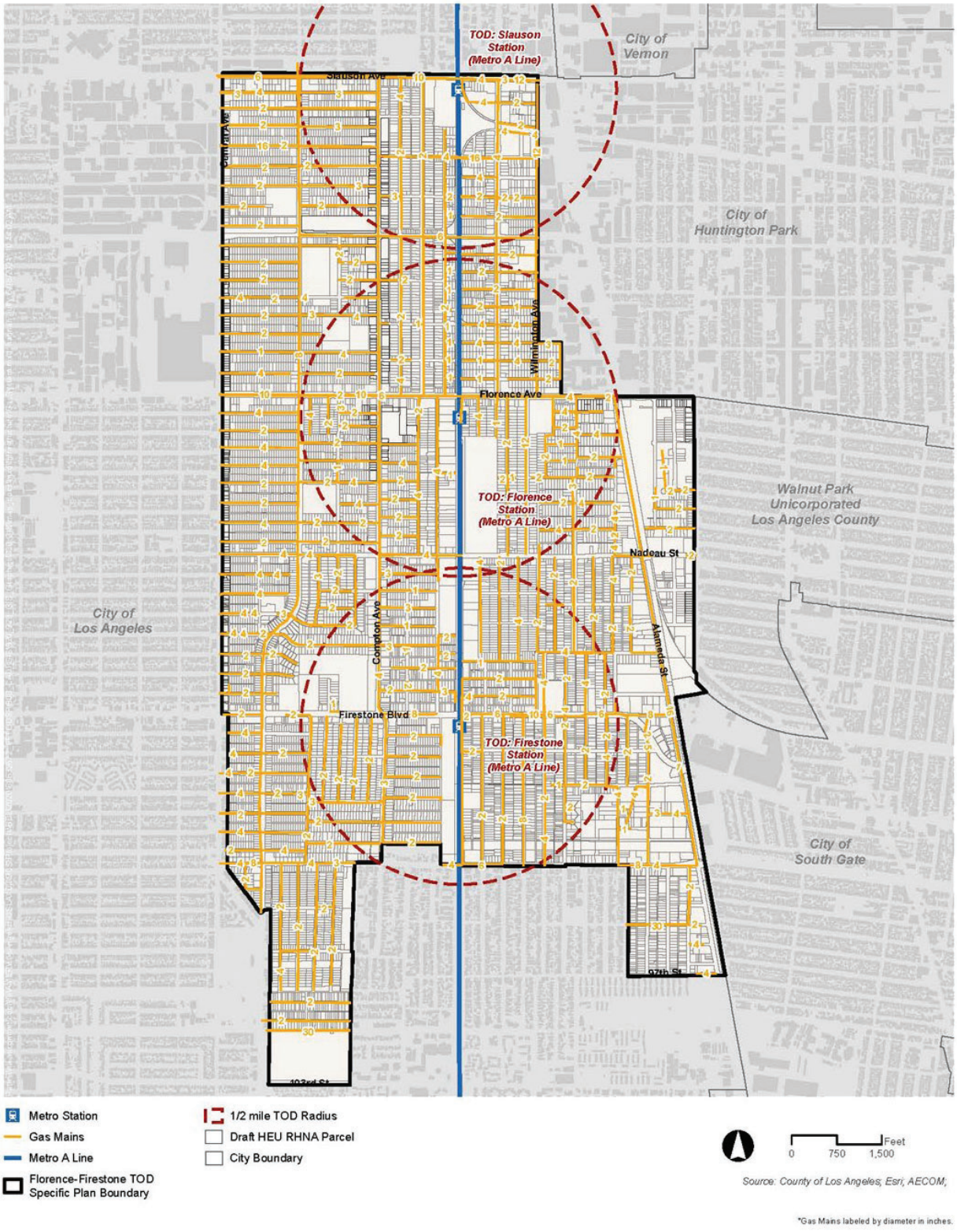


**Figure 3.16-5: Natural Gas System**



amount exceeds the MCL or when water is not treated properly. In California, compliance is usually determined at the wellhead or the surface water intake. Monitoring violations involve failure to conduct or to report in a timely fashion the results of required monitoring. In addition, DDW conducts water source assessments, oversees water recycling projects, permits water treatment devices, certifies water system employees, promotes water system security, and administers grants under the State Revolving Fund and State bonds for water system improvements.

### *Clean Water Act*

The Federal Clean Water Act of 1972 (CWA) established the basic structure for regulating discharges of pollutants into Waters of the U.S. and regulating quality standards for surface waters. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for industries and surface waters. Section 401 of the CWA made it unlawful to discharge any pollutant from a point source into navigable waters unless a permit was obtained. The EPA's NPDES permit program controls discharges pursuant to Section 402 of the CWA, which requires that all construction sites on 1 acre or greater of land, as well as municipal, industrial, and commercial facilities discharging wastewater or stormwater directly from a point source into a Water of the U.S. (a lake, river, and/or ocean) must obtain permission under the NPDES permit. All NPDES permits are written to ensure that U.S. receiving waters will achieve specified water quality standards. Point sources are discrete conveyances, such as pipes or human-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The provisions of Section 401 of the CWA are enforced through the SWRCB and local RWQCBs.

## State

### *California Urban Water Management Planning Act of 1983*

The California Urban Water Management Planning Act (Assembly Bill [AB] 797, Water Code Division 6, Part 2.6, Section 10610-10656) requires that every urban water supplier that annually serves 3,000 or more customers, or provides more than 3,000 acre-feet of water, must prepare and adopt an Urban Water Management Plan (UWMP). UWMPs provide a description and evaluation of water supplies, reclamation programs, and conservation activities. Based on land use plans provided by local governments, population projections or other inputs, the UWMP calculates the projected water demand for the district and compares this demand against current and anticipated water supplies. These UWMPs, which must be updated every 5 years, are provided to local governments to help inform decisions on development proposals. UWMPs serve as building blocks for Integrated Regional Water Management Plans, which define a clear vision and strategy for the sustainable management of water resources within a specific region delineated by one or more watersheds.

### *The Planning for Healthy Communities Act (Senate Bill 1000)*

Senate Bill (SB) 1000 was signed by Governor Brown in 2016. SB 1000 requires that both cities and counties that have disadvantaged communities incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies,

and objectives throughout the other elements upon the adoption or next revision of two or more elements concurrently. The purpose of the legislation is to address the "unique or compounded health risks" in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. As a result of SB 1000, the State of California Governor's Office of Planning and Research (OPR) has updated their General Plan guidelines to reflect changes pertaining to SB 1000.

The OPR General Plan guidelines provide guidance for developing EJ goals, policies, and programs that address the unique and compounded health risks in disadvantaged communities and prioritize improvements and programs that meet the needs of disadvantaged communities. As part of the requirements for reducing pollution exposure, a general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by reducing pollution exposure, including exposure to substances in air, water, and soil; exposure to extreme noise; access to safe, clean, and affordable drinking water; and inadequate separation between incompatible land uses such as sensitive uses near industrial or agricultural uses. These requirements to protect sensitive receptors from environmental burdens related to pollution are also related to ensuring equitable access and connections to public services and facilities, including safe drinking water and wastewater services, flood control, and water drainage.

In addition, the OPR General Plan guidelines state that while not specifically required, local agencies should consider that the effects of climate change will affect vulnerable and disadvantaged communities disproportionately compared to the population as a whole in California; therefore, considering climate vulnerability in disadvantaged communities when preparing the vulnerability assessment and adaptation goals, policies, and programs for the safety element would be an appropriate linkage with the EJ element or equivalent. Local agencies must address climate vulnerability and adaptation under the safety element pursuant to SB 379, which is required to analyze existing hazards as well as the impacts of climate change on the community related to existing and future hazards, such as flooding, drought, wildfire, and extreme heat. Populations at higher risk under a changing climate include those who are uninsured or underinsured; lack access to health care, child care, or transportation; live in areas with poor air quality, upper floors of tall buildings, or in areas with lots of impervious surfaces and little tree cover; lack life-supporting resources such as adequate housing, ways to cool living space; are food insecure or lack adequate medications; or are tenants or renters.

### *California Global Warming Solutions Act of 2006 (AB32 and SB 535)*

The California Global Warming Solutions Act of 2006 required the State Air Resources Board to adopt regulations to require the reporting and verification of emissions of greenhouse gases and to monitor and enforce compliance with the reporting and verification program, and requires the state board to adopt a statewide greenhouse gas emissions limit equivalent to the statewide greenhouse gas emissions level in 1990 to be achieved by 2020. Utilities related to greenhouse gas emissions (e.g., electric power generation/transmission, commercial and residential sewerage systems and water supply, natural gas transmission and distribution, wastewater treatment, solid waste treatment) are regulated in order to comply with the California Global Warming Solutions Act. The California Global Warming Solutions Act of 2006 require that facilities report and verify the emissions of greenhouse gases in order to comply with regulations. Facilities are thereby required to meet statewide greenhouse gas emission limits.

### *Porter-Cologne Water Quality Control Act*

The 1969 Porter-Cologne Water Quality Control Act, codified in Section 13000 (Water Quality) et seq. of the California Water Code, authorizes the SWRCB to implement programs to control polluted discharges into State waters. This law essentially implements the requirements of the CWA. Pursuant to this law, the local RWQCB is required to establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge.

### *Construction General Permit for Stormwater Discharges*

Pursuant to the CWA Section 402(p), requiring regulations for permitting certain stormwater discharges, the SWRCB issued a statewide general permit for stormwater discharges from construction sites (Water Quality Order 2009-0009-DWQ, SWRCB NPDES General Permit for Stormwater Discharges Associated with Construction Activity [NPDES No. CAR000002]; adopted by the SWRCB on September 2, 2009).

Under the Construction General Permit, discharges of stormwater from construction sites with a disturbed area of 1 or more acres are required to either obtain individual NPDES permits for stormwater discharges or to be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing a construction site risk assessment to determine appropriate coverage level; preparing a SWPPP, including site maps, a Construction Site Monitoring Program, and sediment basin design calculations; for projects outside of a Phase I or Phase II permit area, completing a post-construction water balance calculation for hydromodification controls; and completing a Notice of Intent. All of these documents must be electronically submitted to the SWRCB for General Permit coverage. The primary objective of the SWPPP is to identify and apply proper construction, implementation, and maintenance of best management practices (BMPs) to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site during construction. The SWPPP also outlines the monitoring and sampling program required for the construction site to verify compliance with discharge Numeric Action Levels set by the Construction General Permit.

### *MS4 Permit Planning and Land Development Program Requirements*

In 2016, the Los Angeles RWQCB (LARWQCB) issued a revised NPDES Permit and Waste Discharge Requirements (Order No. R4-2012-0175; NPDES Permit No. CAS004001) under the CWA and the Porter-Cologne Act for discharges of urban runoff in public storm drains in Los Angeles County. The permittees are the Los Angeles County Flood Control District, Los Angeles County, and 84 incorporated cities within the coastal watersheds of Los Angeles County. This permit regulates stormwater discharges from municipal separate storm sewer systems (MS4s) in the proposed program area. The MS4 Permit details specific requirements for new development and significant redevelopment projects including selection, sizing, and design criteria for LID, treatment control, and hydromodification control BMPs.

### *Solid Waste: Diversion Rule (AB 341)*

Under commercial recycling law (Chapter 476, Statutes of 2011), AB 341 directed the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling. CalRecycle initiated formal rulemaking with a 45-day comment period beginning October 28, 2011. The final regulation was approved by the Office of

Administrative Law on May 7, 2012. AB 341 declared a policy goal of the state that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020.

- **IV.I.2.a (2).1. Mandatory Commercial Recycling (AB 939):** AB 939, as amended, requires each city and county (for unincorporated areas) in the state to reduce by 50 percent the amount of solid waste disposed at land disposal and transportation facilities through source reduction, recycling, composting, and other waste reduction activities.
- **IV.I.2.a (2).2. Mandatory Commercial Organics Recycling (AB 1826):** AB 1826 (2014) requires certain businesses to set up recycling services for recyclables and organic waste. The laws also require Los Angeles County to implement a commercial solid waste recycling program and an organic waste recycling program that is designed specifically to divert commercial solid waste and organic waste generated by businesses. Failure to comply may subject the city or county to fines of up to $10,000 per day.
- **IV.I.2.a (2).3. Short-Lived Climate Pollutants: Organic Waste Methane Emissions Reductions (SB 1383)**: SB 1383 (2016) requires Los Angeles County to provide and enforce mandatory organic waste recycling services to all waste generators, including residents, businesses, and Los Angeles County facilities. Failure to comply will subject Los Angeles County to fines up to $10,000 per day.

### *California Integrated Waste Management Act*

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, the act required city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The act also required each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 by the year 2000.

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element to describe how it would reach the goals. The Source Reduction and Recycling Element contains programs and policies for fulfillment of the goals of the act, include the above-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristic of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the County Integrated Waste Management Board to provide an update on their progress toward the AB 939 goals.

### *California Solid Waste Reuse and Recycling Act*

The California Solid Waste Reuse and Recycling Act of 1991 (AB 2176) was enacted to assist local jurisdictions with accomplishing the goals of AB 939. The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, the act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required

to maintain the 50-percent diversion specified by AB 939 by the year 2000. In accordance with AB 2176, any application submitted for a building permit must include adequate, accessible areas for the collection and loading of recyclable materials. Furthermore, the areas to be used must be demonstrated as adequate in capacity, number, and distribution to serve the proposed program. Moreover, the collection areas are to be situated as close as possible to existing exterior refuse collection areas.

### *On-site Wastewater Treatment Systems Policy: Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems*

In June 2012, the SWRCB published the On-site Wastewater Treatment Systems (OWTS) Policy: Water Quality Control Policy for Siting, Design, Operation, and Maintenance of OWTS. The OWTS Policy allows for the continued use of OWTS, while protecting water quality and public health. This policy recognizes that responsible local agencies can provide the most effective means to manage OWTS on a routine basis. Therefore, as an important element, it is the intent of this policy to efficiently use—and improve on where necessary—existing local programs through coordination between the State and local agencies. To accomplish this purpose, this policy establishes a statewide, risk-based, tiered approach for the regulation and management of OWTS installations and replacements and sets the level of performance and protection expected from OWTS. In particular, the policy requires actions for water bodies specifically identified as part of this policy where OWTS contribute to water quality degradation that adversely affect beneficial uses.

### *California Green Building Standards Code*

Effective January 1, 2020, Section 5.408 of the 2019 California Green Building Standards Code (Part 11 of California Code of Regulations Title 24) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse, or that the conditions of a local construction and demolition waste management ordinance are met, whichever is more stringent.

### *Executive Order B-40-17*

On April 7, 2017, the Governor issued Executive Order B-40-17, which lifted the January 17, 2014 drought emergency except in the counties of Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects continue to address diminished groundwater supplies, and retains prohibitions on wasteful practices. Executive Order B-40-17 builds on actions taken in Executive Order B-37-16—which remains in effect—to continue making water conservation a way of life in California. Under this executive order, permanent restrictions shall prohibit wasteful practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non-recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians. The Department of Water Resources will continue to work with the water board to develop standards that urban water suppliers will use to set new urban water use efficiency targets as directed by Executive Order B-37-16; the water board will adopt urban water use efficiency standards that include indoor use, outdoor use, and leaks, as well as performance measurements for commercial, industrial, and

institutional water use. The order also rescinds two emergency proclamations from January and April 2014 and four drought-related executive orders issued in 2014 and 2015.

## Local

### *Los Angeles County Integrated Waste Management Plan*

The Los Angeles County Integrated Waste Management Plan addresses Los Angeles County's efforts to plan for the management and disposal of solid waste for a 15-year planning period and also addresses Los Angeles County's efforts regarding conversion technology, green waste, and disposal capacity. AB 939 requires each county to prepare a countywide siting element (CSE) that describes how the county and the cities within the county, plan to manage the disposal of their solid waste for a 15-year planning period.

The CSE establishes goals and policies for Los Angeles County to maintain adequate permitted disposal capacity for a 15-year planning period. To provide adequate disposal capacity, the CSE offers strategies and establishes siting criteria for potential sites. Existing landfills (including those out-of-county) are identified and analyzed regarding their permitted disposal capacity and estimated closure date. Additionally, the CSE includes goals and policies to facilitate the use of out-of-county/remote landfills and to foster the development of alternatives to landfill disposal, such as CTs on a countywide basis.

The goals and policies are either being or may have to be implemented by Los Angeles County and cities in the county to meet the mandates of the AB 939. The nine goals are as follows:

1. To protect the health, welfare, and safety of all citizens by addressing the disposal need of the 88 cities in Los Angeles County and unincorporated communities during the 15-year planning period through the development of environmentally safe and technically feasible disposal facilities for solid waste that cannot be reduced, reused, recycled, or composted.

   This goal incorporates policies to:

   - Enhance in-County landfill disposal capacity
   - Facilitate utilization of out-of-County/remote disposal facilities

2. To foster the development of transformation and other innovative solid waste disposal technologies as alternatives to landfill disposal.
3. To protect the economic well-being of Los Angeles County by ensuring that the cities and unincorporated communities are served by an efficient and economical public/private solid waste disposal system.
4. To protect the economic well-being of Los Angeles County by ensuring that the cities and unincorporated communities are served by an efficient and economical public/private solid waste disposal system.
5. To provide siting criteria that considers and provides for the environmentally safe and technically feasible development of solid waste disposal facilities.
6. To reduce the volume (tonnage) of solid waste requiring disposal/transformation by continuing to implement and expand source reduction, recycling, composting, and public education programs.

7. To conserve Class III landfill capacity through diversion of inert waste, disposal of inert waste at unclassified landfills, increased waste disposal compaction rates, and use of green waste and other appropriate materials for landfill daily cover.
8. To promote, encourage, and expand waste diversion activities at disposal facilities.
9. To promote adequate markets for recycled materials and compost products.

### *Los Angeles County Roadmap to a Sustainable Waste Management Future*

On October 21, 2014, the board of supervisors adopted the Roadmap to a Sustainable Waste Management Future that established a goal to divert 80 percent of solid waste generated in the unincorporated county areas from landfills by 2025, 90 percent by 2035, and 95 percent or more by 2045 The Los Angeles County Roadmap to a Sustainable Waste Management Future is currently being updated. Los Angeles County's efforts to achieve waste diversion are guided by the new waste management paradigm, which places a greater emphasis on source reduction, reuse, recycling, and otherwise maximizing the benefits and use of materials over disposal. Los Angeles County continues to make progress towards implementing the initiatives outlined in the roadmap. However, recent developments impacting the solid waste management system present strong challenges to continued progress. These include strong economic activity in Los Angeles County's unincorporated areas (with a corresponding increase in waste generation) and unstable statewide recycling markets. The continued implementation of the roadmap's initiatives over the next few years (such as organic waste recycling) and the implementation of new ordinances, will help Los Angeles County continue to make strides towards achieving the roadmap's goal of 80-percent diversion by 2025.

### *Countywide Organic Waste Management Plan*

In April 2018, Los Angeles County published its Countywide Organic Waste Management Plan (Organics Plan). The Organics Plan is intended to identify and determine whether there is adequate compostable organic waste processing facility infrastructure and processing capacity to meet the demand for organic waste that is projected to be diverted due to the newly enacted legislation. The Organics Plan provides an estimate of the total organic waste processing capacity currently available in Los Angeles County and the neighboring counties in the Southern California region. An analysis of the additional processing capacity needed to handle organic waste recycling is also included in the Organics Plan. Currently, Los Angeles County is working on the first annual update to the Organics Plan.

### *Chapter 12.84: Los Angeles County Low Impact Development Ordinance (No. 2008-0063)*

Chapter 12.84 of the Los Angeles County Municipal Code requires the use of LID BMPs in development projects to improve Los Angeles County's watersheds by preserving drainage paths and natural water supplies. This chapter applies to all development in the unincorporated area of Los Angeles County after January 1, 2009, except for those developments that filed a complete discretionary or nondiscretionary permit application with the County Department of Regional Planning, Los Angeles County Public Works, or any Los Angeles County-controlled design control board, prior to January 1, 2009.

Chapter 12.84 requires that applicable development projects:

- Mimic undeveloped stormwater runoff rates and volumes in any storm event up to and including the "Capital Flood" event, as defined by the Los Angeles County Public Works
- Prevent pollutants of concern from leaving the development site in stormwater as the result of storms, up to and including a Water Quality Design Storm Event
- Minimize hydromodification impacts to natural drainage systems

To meet these standards, applicable development projects must comply with the following:

1. The project must retain 100 percent of the Stormwater Quality Design Volume (SWQDv) on site, through infiltration, evapotranspiration, rainfall harvest and use, or a combination thereof, unless the director of Los Angeles County Public Works determines that it would be technically infeasible to do so.
2. If the director determines that it would be technically infeasible to retain one hundred percent of the SWQDv on site, the project must comply with one of the following alternative compliance measures:
    a. The project must provide for on-site biofiltration of one and one-half times the portion of the SWQDv that is not retained on site.
    b. The project must include infiltration or bioretention BMPs to intercept the portion of the SWQDv that is not retained on site at an off-site location, as approved by the director of public works. The project must also provide for treatment of the portion of the SWQDv discharged from the project site, as approved by the director of public works.
    c. The project must provide for the replenishment of groundwater supplies that have a designated beneficial use in the Basin Plan:
        i. Groundwater replenishment projects must include infiltration or bioretention BMPs to intercept the portion of the SWQDv that is not retained on site at an off-site location, as approved by the director of public works.
        ii. Groundwater replenishment projects must also provide for treatment of the portion of the SWQDv discharged from the project site, as approved by the director of public works.
    d. The project must include infiltration, bioretention, or rainfall harvest and use BMPs to retrofit an existing development with similar land uses as the project to intercept the portion of the SWQDv that is not retained on site.
    e. Los Angeles County, independently or in conjunction with one or more cities, may apply to the RWQCB for approval of a regional or subregional stormwater mitigation program to substitute in part or wholly for the provisions of this chapter for the area covered by the regional or subregional stormwater mitigation program. If the RWQCB approves the program, provisions of the program must apply in lieu of any conflicting provisions of this chapter.

In addition, development projects that consist of five or more residential units, or nonresidential development projects, must comply with the following:

- The excess volume ($\Delta V$, defined as the post-developed runoff volume minus the pre-developed runoff volume for the 85th percentile storm event) from each lot where such development is occurring must be infiltrated at the lot level; or in the alternative, the excess volume from the entire development site, including streets and public right-of-way, must be infiltrated in subregional facilities. The tributary area of a subregional facility must be limited

to 5 acres but may be exceeded with approval of the director of public works. When the director of public works determines that infiltration of all excess volume is not technically feasible, on-site storage, reuse, or other water conservation uses of the excess volume is required and must be implemented as authorized by the director of public works and the runoff from the SWQDv must be treated to the satisfaction of the director of public works before discharge.

### *Los Angeles County Stormwater Ordinance*

Chapter 12.80 – Stormwater and Runoff Pollution Control of the Los Angeles County Municipal Code was developed to protect the health and safety of the residents of the county by protecting the beneficial uses, marine habitats, and ecosystems of receiving waters within the county from pollutants carried by stormwater and non-stormwater discharges. In addition, the Stormwater and Runoff Pollution Control of the Los Angeles County Municipal Code protect the water quality of the receiving waters of the county and the U.S., consistent with the act.

Chapter 12.80.400 – Standards, guidelines, and criteria are guidelines set the by director who establishes uniform minimum standards, guidelines, and/or criteria for specific discharges, connections, and/or BMPs. The provisions outlined in Chapter 12.80.400 do not prohibit the director from requiring a discharger or permittee from taking additional measures to achieve the objectives of this chapter or any permit.

### *Model Water Efficient Landscape Ordinance*

The Model Water Efficient Landscape Ordinance adopts water efficiency standards for new and retrofitted landscapes and encourages the use of more efficient irrigation systems, graywater usage, and on-site storm water capture, and limits the portion of landscapes that can be covered in turf.

### *Construction and Demolition Debris Recycling and Reuse Ordinance*

Towards meeting the state's waste reduction mandates, Title 20, Chapter 20.87 of the Los Angeles County Municipal Code requires projects in unincorporated areas to recycle or reuse 50 percent by weight of all construction and demolition debris removed from a site. Submission of a recycling and reuse plan and annual reporting are required to demonstrate compliance with the plan. Single-family or two-family residential structures and associated accessory structures are exempt.

### *Los Angeles County Building Code*

Effective January 1, 2020, the County of Los Angeles Building Code (Title 26) is based on the 2019 California Building Code, Title 24, California Code of Regulations.

### *Los Angeles County General Plan 2035 Public Services and Facilities Element*

The Public Services and Facilities Element of the County General Plan (DRP 2015) has established three goals and four policies relevant to utilities and service systems:

- **PS/F GOAL 1:** A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development

  - Policy PS/F 1.1: Discourage development in areas without adequate public services and facilities

- **PS/F Goal PS/F 2:** Increased water conservation efforts
  - PS/F Policy 2.1: Support water conservation measures
- **PS/FGOAL 3:** Increased local water supplies through the use of new technologies
  - PS/F Policy PS/F 3.1: Increase the supply of water though the development of new sources, such as recycled water, gray water, and rainwater harvesting
  - PS/F Policy 3.2: Support the increased production, distribution and use of recycled water, gray water, and rainwater harvesting to provide for groundwater recharge, seawater intrusion barrier injection, irrigation, industrial processes and other beneficial uses

## 3.16.3 Methodology

The potential for adverse impacts on utilities and service systems has been evaluated based on information concerning current service levels and the ability of the service providers to accommodate the increased demand created by the proposed FFTOD Specific Plan.

### 3.16.3.1 Wastewater Treatment Regulations

The analysis related to wastewater treatment requirements identifies the types of wastewater that is anticipated to be generated by implementation of the FFTOD Specific Plan and regulations related to wastewater. Impacts would be considered significant if implementation of the FFTOD Specific Plan would not comply, be in conflict with, or exceed regulations related to wastewater, such that an impact on the environment could result. This analysis addressed wastewater treatment requirements of the LARWQCB.

### 3.16.3.2 Water/Sewer Capacity

The analysis of water and sewer infrastructure capacity focuses on the magnitude of the change in demand for water supplies and wastewater treatment from buildout of the FFTOD Specific Plan, based on the projected increase in water demand and wastewater generation over the 2035-year horizon of the FFTOD Specific Plan. Impacts are considered significant if buildout of the FFTOD Specific Plan would result in the need for construction of water and wastewater facilities that could result in a significant impact on the environment.

### 3.16.3.3 Water Supply

The analysis of water supply is focused on the nature and magnitude of the change in levels of water use from buildout of the FFTOD Specific Plan. The primary resources used for this analysis include the Liberty Utilities 2015 UWMP, Los Angeles Department of Water and Power UWMP (LADWP 2020), and information provided by the GSWC. The projected increase in water demand over the 2035-year horizon of the FFTOD Specific Plan is compared to future available supplies. The demand generated by the FFTOD Specific Plan at buildout compared to water supplies available determines whether an impact from implementation of the FFTOD Specific Plan would occur. If buildout of the FFTOD Specific Plan would result in new or expanded water supply entitlements, a significant impact could occur.

In addition, if the projected water demand associated with the proposed project is accounted for in the most recently adopted UWMP, the analysis incorporates the supporting information from the UWMP. If the water demand in a service area is not accounted for in a UWMP, the Environmental Impact Report (EIR) includes a discussion with regard to whether the public water system's total projected available water supplies will meet the proposed project's water demand.

### 3.16.3.4 Energy System Capacity

A number of factors are considered when weighing whether a project would use a proportionately large amount of energy that could result in energy capacity problems to existing infrastructure and requiring the expansion of infrastructure or energy supplies. Factors such as the use of on-site renewable energy features and energy conservation features or programs are considered.

Energy usage during project operation would be considered to have a potential impact on energy infrastructure or supplies if the project were to violate federal, state, and/or local energy standards, including Title 24 of the California Code of Regulations, California Green Building standards, preclude use of on-site renewable energy systems, inhibit the use of solar energy, or otherwise conserve energy. Impacts would be considered significant if the project would result in a substantial increase in energy demand that would result in the need to construct or expand energy facilities (electricity and natural gas) that could cause a significant impact on the environment.

### 3.16.3.5 Storm Drain Capacity

The analysis of the FFTOD Specific Plan's impact on stormwater drainage facilities identifies the general increase or decrease in stormwater that is anticipated to occur from buildout of the FFTOD Specific Plan and identifies the existing drainage infrastructure that serves the FFTOD Specific Plan Area. Impacts would be considered significant if the project would result in a substantial increase in stormwater that would result in the need to construct or expand drainage facilities that could cause a significant impact on the environment.

### 3.16.3.6 Landfill Capacity

The analysis of the FFTOD Specific Plan's impact on landfill facilities identifies solid waste that is anticipated to be generated during both construction and operation of the FFTOD Specific Plan. The analysis identifies the anticipated amount of nonhazardous construction debris and operational solid waste that would be generated from implementation of the FFTOD Specific Plan and the amount that would be disposed of in landfills after compliance with recycling/diversion requirements. It was assumed that demolition and construction activities would occur throughout implementation of the FFTOD Specific Plan. In addition, the maximum development that would occur was multiplied by the per capita solid waste generation.

The results (i.e., solid waste after recycling/diversion) are compared with the available capacity of the landfill serving the FFTOD Specific Plan Area to assess the significance of the FFTOD Specific Plan's solid waste generation during construction and at buildout. Impacts would be considered significant if the project would result in a substantial increase in solid waste that would affect landfill capacity to the extent that a new or expanded landfill facility would be required, the development of which could result in an impact on the environment.

### 3.16.3.7 Solid Waste Regulations

The analysis of the FFTOD Specific Plan's impact related to solid waste regulations identifies the nonhazardous solid waste that is anticipated to be generated during both construction and operation of the FFTOD Specific Plan and how the FFTOD Specific Plan would implement the regulations related to disposal of that solid waste.

Impacts would be considered significant if implementation of the FFTOD Specific Plan would not comply or would be in conflict with federal, state, or local statutes or regulations related to solid waste to the extent that an impact on the environment could result.

### Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act Guidelines, the project would have a significant impact on utilities and service systems if it would:

- 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;
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- 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; or
- Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

## 3.16.4 Environmental Impacts

**USS-1:** *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?*

The buildout of the FFTOD Specific Plan Area would result in a net increase of approximately 42,518 additional people associated with 12,110 new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area. The addition of new residential and commercial development would result in increased demand for utilities.

### Water Supply

While demand for water supply would increase, this anticipated increase would be slightly offset by decreased demand based on conversion of existing industrial uses to mixed use format development. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under build-out of the FFTOD Specific Plan. Increases in residential density would result in increased potential water usage including potable water and

fire prevention demand. To service this, the following would be upgraded if increased density developed at the following locations; all other installed water facilities appear to be sufficient for current and proposed buildout:

- All lines servicing fire hydrants must be at least nominal 6 inches per 20.16.100 to supply minimum fire flow requirements per Los Angeles County Municipal Code 20.16.060
- High density residential buildout (Residential Slauson Station zone) of five stories north of 62nd Street and 63rd Street west of Holmes Avenue would require upgrade of the existing 4-inch cast iron pipe by replacing the 4-inch main with 10-inch polyvinyl chloride (PVC) main along 62nd and 8-inch PVC main along 63rd.
- Medium density residential buildout (Residential Medium zone) east of Converse, south of 68th Street, west of Wilmington Avenue and north of Florence Avenue would require upgrade of 4-inch cast iron pipe along 69th Street, 70th Street, and 71st Street by replacing all 4-inch mains in this area with 8-inch PVC mains.

### Wastewater

While four locations, to be discussed in detail below, may serve as exceptions and require upgrading depending on realized density/intensity of buildout of the FFTOD Specific Plan, A preliminary analysis was performed using available information that shows that the existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition. Nevertheless, any future development project having a direct connection to the sewer system would require a sewer analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades.

### Stormwater

Buildout of the FFTOD Specific Plan will generate little increase in runoff to the existing drainage system because the area is completely developed, and projects would be required to incorporate LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines.

However, preliminary study results for the Glen Avenue Drain originating at 63rd Street and Gage Avenue would have insufficient capacity to carry the peak flow generated by the 25-year storm. The Glen Avenue Drain leaves the FFTOD Specific Plan Area heading south under Croesus Avenue and carries the runoff from the entire eastern half of the FFTOD Specific Plan Area. The 72-inch by 72-inch reinforced concrete box has insufficient capacity to carry the peak flow runoff generated by the 25-year storm. Therefore, basins served by the Glen Avenue Drain may experience underground drainage system overflows due to deficient underground flow capacity, with associated stress placed on curb and gutter drainage to carry the excess. As discussed in Section 3.8, Hydrology and Water Quality, any future development project having a direct connection to the Hooper Avenue Drain or that is tributary to the Glen Avenue Drain would require a drainage analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades.

### Electricity

The existing system supplies a sufficient level of electrical service to the FFTOD Specific Plan Area and has adequate capacity to serve the buildout. New development or redevelopments would

be responsible for upgrades and undergrounding as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, Los Angeles County Public Works, SCE, and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

### Natural Gas

The analysis and decision on capacity to meet future demand under buildout of the FFTOD Specific Plan will be conducted by the Southern California Gas Company in coordination with Los Angeles County at the time building plans are submitted and development occurs. The development will be responsible for the cost of required upgrades and new or relocated services for new development or redevelopments. Impacts would be less than significant.

### Telecommunications

AT&T will assess demand for services and ability to serve new developments on a case-by-case basis after building plans are submitted by developers. AT&T will pay for any assessed upgrades or new services and recoup the cost later with the additional revenue from new customers.

Wireless communications facilities, either freestanding or attached to a building or structure, require approval of a conditional use permit in compliance with Los Angeles County Municipal Code standards. Conditional use permits for wireless communications facilities expire 10 years from the date of approval unless amended or extended by the planning commission or hearing officer. Impacts would be less than significant.

**USS-2:** *Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

While demand for water supply would increase, this anticipated increase would be slightly offset by decreased demand based on conversion of existing industrial uses to mixed use format development. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under build-out of the FFTOD Specific Plan. Increases in residential density would result in increased potential water usage including potable water and fire prevention demand. To service this, the water facility upgrades described under USS-1 would be recommended if increased density develop at the locations noted; all other installed water facilities appear to be sufficient for current and proposed buildout.

**USS-3:** *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

A preliminary analysis was performed using available information that shows that the existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition. The following locations are exceptions that may require upgrading based on the level of density/intensity realized in the vicinity.

- **Tributary Area 5**: A 10-inch main emptying into a trunk line at the Maie Avenue/Nadeau Street intersection collects from 50 acres of light residential and light manufacturing on the east side of Converse Avenue and Maie Avenue, from north of E 60th Street to Nadeau Avenue. Depending on density/intensity realized in the geography between 60th Street and Nadeau Avenue, east of Converse Avenue and Maie Avenue, the main would need to be upgraded to 15 inches.
- **Tributary Area 6**: An 8-inch main running toward city of Huntington to the east at Slauson Avenue collects from 49 acres of unlimited residence and heavy manufacturing along Holmes Avenue from Gage Street to Slauson Avenue, then east to west from South Pacific railroad lines to Wilmington Avenue which comprises the northeast corner of the FFTOD Specific Plan Area and a majority of the Slauson Station Area. This portion of the FFTOD Specific Plan is planned for high intensity mixed use and medium density residential development replacing existing industrial and primarily single-family uses, respectively. The 8-inch main would be insufficient for current conditions due to the significant presence of heavy manufacturing in the area and would need to be upgraded to 10 inches or 15 inches depending on density/intensity realized from future development.
- **Tributary Area 7**: A 10-inch main flowing south under Holmes Avenue from Gage Avenue to a Trunk line at Florence Avenue runs between South Pacific railroad to the east and Wilmington Avenue to the west. The 10-inch main services 59 acres of mostly unlimited residence with some light manufacturing, neighborhood business, and mixed-use development. This area is planned for low-medium to medium density residential. Depending on density/intensity realized in the geography, the main would need to be upgraded to 15 inches.
- **Tributary Area 9**: An 8-inch main under Parmelee Avenue that flows to the west under E 78th Street and empties into a trunk under Hooper Avenue services about 34 acres south of Florence Avenue, east of Parmelee Avenue and North of E 78th Street. This area is composed of limited density multiple residence, general commerce, and mixed-use development and would need to be upgraded to 10 inches, depending on density/intensity realized in the geography.

Individual project applicants/developers would need to prepare a sewer analysis, that is part of an individual infrastructure assessment, and consult with Los Angeles County Public Works and CSMD regarding future sewer facilities or upgrade considerations. The CSMD would evaluate all development that would occur and conduct its own site-specific analysis of changes to the service trunk and necessary sewer infrastructure upgrades. Additionally, new sewer laterals would be required for new buildings.

**USS-4:** *Would the project 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?*

Waste management is an increasingly challenging issue for urbanized areas as available space for landfills becomes more limited and increasing populations generate more waste. In 2014, the County Board of Supervisors adopted a Roadmap to a Sustainable Waste Management Future. This roadmap outlines the process by which Los Angeles County can implement strategies to reduce solid waste generation in unincorporated areas and through Los Angeles County operations. The Florence-Firestone community is part of this program, which includes goals of reducing solid

waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, impacts would be less than significant.

**USS-5:** *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The FFTOD Specific Plan would result in new development, infill, and redevelopment of land uses that would generate solid waste. All solid waste-generating activities in Los Angeles County are subject to the requirements set forth in AB 939. AB 939 requires diversion of a minimum of 50 percent of construction and demolition debris. In addition, after 2020, development projects pursuant to the FFTOD Specific Plan will be required to divert 75 percent of solid waste pursuant to AB 341.

The proposed FFTOD Specific Plan is also included in the Los Angeles County Roadmap to a Sustainable Waste Management Future program and as such would implement the goals of reducing solid waste for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, existing landfills would be able to accommodate solid waste generated by buildout of the FFTOD Specific Plan and impacts to solid waste management facilities would be less than significant.

Disposal of waste generated from implementation of the FFTOD Specific Plan would be consistent with all state regulations and the policies in the Los Angeles County Integrated Waste Management Plan. Future development under the FFTOD Specific Plan would comply with all solid waste statutes and regulations. Therefore, any impacts that conflict with federal, state, or local statutes or regulations related to solid waste would not occur from implementation of the FFTOD Specific Plan. There would be no impacts.

## 3.16.5 Programmatic Mitigation Measures

In order to reduce impacts to thresholds USS-1 through USS-3 to less than significant, the following programmatic mitigation measures would need to be implemented:

**MM-USS-1** Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with GSWC requirements, Los Angeles County development regulations, and the California Subdivision Map Act.

The GSWC Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations.

**MM-USS-2** Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity.

**MM-USS-3** New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.

CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." The following are "Public Interest" criteria:

- Eliminate an unusually heavy concentration of overhead lines
- Involve a street or road with a high volume of public traffic
- Benefit a civic or public recreation area or area of unusual scenic interest
- Be listed as an arterial street or major collector as defined by the governor's OPR Guidelines

Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year "borrow forward" if required), and the creation of a utility underground district.

The following areas deserve some consideration for a Rule 20A undergrounding process:

- Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit.
- Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit.
- Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area.
- Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these

lines would greatly improve the eastern half of the FFTOD Specific Plan Area.

**MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

## 3.16.6 Level of Significance After Mitigation

Implementation of programmatic mitigation measures MM USS-1 through MM USS-3 and MM HYD-1, would reduce potential impacts associated with water supply, sewer, stormwater drainage, and electricity to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to utilities and service systems have been identified for the project.

## 3.16.7 Cumulative Impacts

Cumulative water infrastructure impacts are considered on a system-wide basis and are associated with the capacity of existing and planned infrastructure. The cumulative system evaluated includes the GSWC infrastructure systems that are serving the Florence-Firestone community and adjacent land uses. Noncontiguous GSWC service areas are not part of the geographical area of cumulative analysis. Cumulative development in the water service areas would include infill and redevelopment projects. These cumulative projects could result in the need for new or upgraded water infrastructure. The construction activities associated with new or upgraded water facilities could result in significant environmental impacts. The FFTOD Specific Plan has evaluated infrastructure needs for water service and has included improvements to existing facilities to ensure that buildout of the FFTOD Specific Plan would be served by adequate infrastructure. Because the project would not require the construction of water facilities beyond the improvements that are part of the project, the FFTOD Specific Plan would not have a cumulatively considerable contribution to potential significant cumulative impacts associated with water infrastructure

Cumulative wastewater treatment requirement impacts are considered on a system-wide basis and are associated with the operation of the wastewater disposal at the SMD. Cumulative developments in the urban and developed areas that are served by the SMD would consist of infill and redevelopment projects that could include similar to those that would be implemented by the proposed FFTOD Specific Plan. These similar land uses are not expected to discharge wastewater that contains harmful levels of toxins beyond the regulations of the LARWQCB and all effluent would comply with the wastewater treatment standards of the RWQCB. Cumulative development could also include industrial uses. Any industrial facilities that have the potential to discharge hazardous wastewater would require specific permitting by the RWQCB prior to connecting to the

sewer system, which would ensure that flows are within the regulations of the LARWQCB. Therefore, impacts related to the potential for cumulative projects to exceed wastewater treatment requirements of the LARWQCB would be less than significant.

The FFTOD Specific Plan Area is generally covered with impervious surfaces; development of projects pursuant to the FFTOD Specific Plan would not substantially increase the amount of impervious surfaces and runoff to the extent that existing storm drains would be overwhelmed because all development projects would be required to comply with the same Standard Urban Storm Water Mitigation Plan, LID, and RWQCB permit requirements to retain the difference between the volume pre- and post-construction runoff volume. In addition, implementation of the FFTOD Specific Plan would include installation of landscaping along streets and within open space areas. The new landscaping areas would help to capture, retain, and use some surface water runoff for irrigation, which would reduce the amount of surface runoff in the storm drain pipelines. Overall, with implementation of the new pervious areas and compliance with applicable regulatory requirements, the project's contribution to cumulative impacts related to stormwater drainage capacity would be less than cumulatively considerable.

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development in southern California because energy (including electricity, natural gas, and petroleum) is generated and distributed by regional utility providers throughout the southern California region. All development projects throughout the region would be required to comply with the energy efficiency requirements of the California Green Building Standards / Title 24 and LID requirements. In addition, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, cumulative energy utility system capacity problems would not result, and the construction of new or expanded energy facilities would not be required from the related infill development within the urban and developed region. Therefore, impacts from cumulative projects associated with energy would be less than significant.

Development pursuant to the proposed FFTOD Specific Plan would incrementally contribute to the need for regional energy. As described above, the FFTOD Specific Plan would include uses that would involve energy consumption quantities that are typical for urban infill development, and no operational activities or land uses would occur that would result in extraordinary energy consumption. Overall, implementation of the proposed FFTOD Specific Plan would not result in a significant demand on regional energy infrastructure and would not create energy utility system capacity problems or result in the construction of new energy facilities or expansion of existing facilities or entitlements. As a result, the project's contribution to cumulative impacts related to the energy infrastructure system and entitlements would be less than cumulatively considerable.

Although the project would contribute solid waste to the landfills, the addition would not substantially impact the permitted capacity of the landfills. Therefore, the increase in solid waste from operation of the proposed FFTOD Specific Plan in combination with planned growth in Los Angeles County would not require construction of a new landfill or expansion of the existing landfill to meet capacity needs. As a result, the project's contribution to cumulative impacts on the capacities of the landfill facilities would be less than cumulatively considerable.

The geographic scope of cumulative analysis for compliance related to solid waste regulations is the service area for the landfills that serve Los Angeles County. Disposal of solid waste generated by cumulative development would be subject to the requirements set forth in AB 939, AB 341, and the policies in the Los Angeles County Integrated Waste Management Plan. Therefore, cumulative development would comply with all solid waste statutes and regulations, and cumulative development would result in no impacts. Because disposal of solid waste generated by the FFTOD Specific Plan would comply with all solid waste statutes and regulations, the FFTOD Specific Plan would not contribute impacts related to conflicts with solid waste regulations. Therefore, the project would not contribute to cumulative impacts associate with compliance with solid waste statutes and regulations.

## 3.16.8 References

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Golden State Water Company (GSWC). 2020. Florence-Graham Water System: Consumer Confidence Report on Water Quality for 2019.

# 4.0 ALTERNATIVES

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this Draft Environmental Impact Report (EIR) contains a comparative impact assessment of alternatives to the project. The primary purpose of this section is to provide decision makers and the public with a reasonable range of feasible project alternatives that could attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project.

CEQA Guidelines Section 15126.6 states:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Analysis of three alternatives to the project is guided by the following considerations set forth under CEQA Guidelines Section 15126.6:

- An EIR need not consider every conceivable alternative to a project
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process
- Reasons for rejecting alternative include:
    - Failure to meet most of the basic project objectives
    - Infeasibility
    - Inability to avoid significant effects

Alternatives to a project must be considered even if they would impede—to some degree—the attainment of project objectives or be more costly (CEQA Guidelines Section 15126.6[b]). However, the range of alternatives addressed in an EIR need not be exhaustive, and is governed by a "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR must examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. An EIR does not need to consider an alternative if effects cannot be reasonably ascertained, remote and speculative implementation, or that would not substantially lessen or avoid the significant effects of the project. CEQA Guidelines Section 15126.6(d) states that if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternatives should be discussed but "in less detail than the significant effects of the project as proposed."

CEQA Guidelines Section 15364 defines feasibility as "capable of being accomplished in a successful manner with a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The determination of the feasibility of project alternatives may include—but is not limited to—factors such as: site suitability, economic viability, infrastructure availability, general plan consistency, regulatory and jurisdictional limitations, and

whether the project proponent can reasonably acquire, control or otherwise have access to an alternative project site (CEQA Guidelines Section 15126.6[f][1]).

A comparison of impacts associated with the project and alternatives is provided in this section. In several cases, the description and severity of the impact may be the same under each scenario when compared with the CEQA Thresholds of Significance (i.e., both scenarios would result in a less than significant impact). However, the actual degree of impact may be slightly different under each scenario, and this relative difference is the basis for a conclusion of greater or lesser impacts. In addition, the alternatives analysis includes the assumption that all applicable mitigation measures associated with the project would be implemented with a given project alternative with the exception of the No Project Alternative.

An evaluation of a No Project Alternative is required by CEQA Guidelines Section 15126.6(e) and is included in this section as Alternative 1, No Project/Development in Accordance with Existing Zoning. Two additional alternatives: Alternative 2, Firestone Transit Oriented District (TOD) Modified Land Use; and Alternative 3, Slauson TOD Focused, are also analyzed and compared to the project.

# 4.1 ALTERNATIVE DESCRIPTIONS

## 4.1.1 Alternative 1: No Project/Development in Accordance with Existing Zoning

This alternative would result in limited additional development of the commercial and mixed use corridors under existing zoning per the Florence-Firestone Community Plan (FFCP), Los Angeles County Municipal Code, and Florence-Firestone Community Standards District (CSD). Capacity for mixed use residential and nonresidential would not be introduced along Slauson Avenue, Compton Avenue, Gage Avenue, Central Avenue, Nadeau Street, or Firestone Boulevard. The residentially zoned areas in the Florence-Firestone community are largely built out and would likely be limited in any additional development.

Under this alternative Los Angeles County would implement the General Plan land use designations established by the FFCP. Buildout of Alternative 1 is represented by the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) 2016-2014 Model for the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Area, interpolated to the horizon year (2035) of the proposed Specific Plan. Therefore, the expected limited development in accordance with existing zoning would be approximately 14,911 additional residential units and 2,061,510 additional square feet of nonresidential uses. In comparison to the proposed FFTOD Specific Plan, this alternative would result in fewer residential units (10,621 housing units) and more nonresidential uses (563,757 square feet).

### 4.1.2 Alternative 2: Firestone TOD Modified Land Use

Development under this alternative would result in expanded implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street. The proposed FFTOD Specific Plan zones this area as RLM-1 limiting maximum density to 18 dwelling units per acre (du/ac) to support community stability and maintain property ownership/existing residents in the area. The proposed FFTOD Specific Plan zoning is expected to result in 25,532 potential net new residential units by 2035 generated primarily through addition of ADUs and conversion of existing single-family homes to duplexes. Under this alternative, RLM-1 zoning would be converted to RLM-2 and RM zoning allowing 20 to 30 du/ac and 20-50 du/ac, respectively. This alternative would include all other land uses under the proposed FFTOD Specific Plan. Therefore, development under this alternative would result in net increases of up to 25,596 residential units by 2035 within the FFTOD Specific Plan Area (64 units more than the proposed project) and 1,546,348 square feet of nonresidential uses. Increased zoning under this alternative would be expected to increase displacement of property owners and existing residents based on a higher likelihood for lot consolidation, increased property values, and increased rents. In comparison to the proposed FFTOD Specific Plan, this alternative would result in an additional 64 residential units and 48,595 nonresidential square feet. The purpose of this alternative is to present other configurations considered, despite greater potential impacts, for the purpose of additional information for the public and decision makers.

### 4.1.3 Alternative 3: Slauson TOD Focused

Development under this alternative would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update Regional Housing Needs Assessment (RHNA) sites. The MU-T, MXD, IF, RSS, RM, and RLM-2 zones in the Slauson Station TOD as identified by the proposed FFTOD Specific Plan would be implemented. All parcels identified as Housing Element Update RHNA Parcels, predominantly rezoning to MXD would also be implemented throughout the FFTOD Specific Plan Area. All land uses and zones outside the half-mile TOD radius from the Slauson Station and identified RHNA parcels would remain consistent with existing General Plan land use designations, the FFCP, and existing zoning of the Los Angeles County Municipal Code and Florence-Firestone Community Standards District. Other corridors zoned nonresidential or mixed use would realize limited additional development consistent with the existing zoning consistent with the expectations identified in the No Project/Development in Accordance with Existing Zoning Alternative.

Therefore, development under this alternative would result in development of up to 22,848 residential units and 1,169,894 nonresidential square feet in the FFTOD Specific Plan Area by 2035. In comparison to the proposed FFTOD Specific Plan, this alternative would result in 2,684 fewer residential units and decrease nonresidential uses by 327,859 square feet.

## 4.2 SIGNIFICANT, ADVERSE, AND UNAVOIDABLE IMPACTS

The proposed project would result in the following project and cumulative significant impacts that cannot be reduced to less than significant, even with the implementation of feasible mitigation measures.

**Air Quality**

- Conflict with or obstruct implementation of Air Quality Management Plan
  Air Quality Standards/Violations related to operational emissions in excess of the South Coast Air Quality Management District (SCAQMD) regional emissions thresholds for volatile organic compounds (VOC), carbon monoxide (CO), nitrogen oxides (NOx), particulate matter with a diameter of 10 microns or less ($PM_{10}$), and particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$) and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SCAB)

**Cultural Resources**

- Impacts to historical resources

## 4.3 PROJECT OBJECTIVES

The Department of Regional Planning developed the following objectives for the proposed project, based off analysis from the Equity & Mobility Study, and all stages of community input:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three Los Angeles Metropolitan Transit Authority (LA Metro) A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

## 4.4 ALTERNATIVES CONSIDERED AND WITHDRAWN

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, greenhouse gas emissions, land use and planning, noise, population and housing, public services, recreation, transportation, and utilities and service systems. Without a site specific analysis, impacts on aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources cannot be evaluated. Therefore, another location would not avoid or substantially lessen the effects of the proposed project.

As part of the Los Angeles County General Plan Update, Los Angeles County identified several urban and suburban areas with access to major transit and commercial corridors as priority policy areas for infill development. Alternative sites were not selected for evaluation because the primary purpose of the project is to implement the Los Angeles County General Plan 2035 TOD Program,

which is intended to focus on the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, there are three LA Metro A Line Stations (the Slauson, Florence, and Firestone Stations) and the purpose of the project cannot be met by focusing on alternative sites. The FFTOD Specific Plan Area was identified as one of the priority areas for the TOD Program as it is well suited for higher density housing and a mix of uses surrounding existing major commercial, employment, and civic activity nodes served by high-quality transit. The Specific Plan can leverage the community of Florence-Firestone's assets, connecting uses and activities, and attracting future investment. The LA Metro Stations' (Slauson, Florence, and Firestone Stations) proximity to major job centers and regional destinations spanning downtown Los Angeles to Long Beach creates many opportunities for improving the built environment and overall community that other locations would not be able to provide.

Overall, the purpose of the FFTOD Specific Plan is to create a land use and zoning policy tool to enable more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations, and reduce vehicle miles traveled by cars. The Specific Plan development standards and strategies are designed to balance TOD development with community benefits that support a wide range of residents, workers, and small business owners. The land use and mobility concepts focus on improving the connection between the community and the three LA Metro transit stations.

## 4.5 ALTERNATIVES FURTHER EVALUATED

This section analyzes the following alternatives: Alternative 1, No Project/Development in Accordance with Existing Zoning; Alternative 2, Firestone TOD Modified Land Use; and Alternative 3, Slauson TOD Focused. Community-wide information regarding dwelling units, population, population per household, nonresidential square footage, and employment projections for each of the alternatives is provided in Table 4-1. A summary comparison by individual issue area for each alternative is provided in Table 4-2.

**Table 4-1: FFTOD Specific Plan Area Future Condition (2035)**

| | Units (Households) | Population | Population / Household | Nonresidential Square Feet | Total Employment |
|---|---|---|---|---|---|
| **Proposed Project** | 25,532 | 100,423 | 3.9 | 1,497,753 | 11,408 |
| **Alternative 1: No Project/Development in Accordance with Existing Zoning** | 14,911 | 66,072 | 4.4 | 2,061,510 | 9,591 |
| **Alternative 2: Firestone TOD Modified Land Use** | 25,596 | 101,308 | 4.0 | 1,546,348 | 11,520 |
| **Alternative 3: Slauson TOD Focused** | 22,848 | 91,253 | 4.0 | 1,169,894 | 10,651 |

**Table 4-2: Alternative Comparison**

| Environmental Issue | Proposed Project | Alternative 1: No Project/Development in Accordance with Existing Zoning | Alternative 2: Firestone TOD Modified Land Use | Alternative 3: Slauson TOD Focused |
|---|---|---|---|---|
| **Aesthetics** | | | | |
| Visual Character and Scenic Quality | LS | LS (E) | LS (E) | LS (E) |
| Shadows, Light and Glare | LS | LS (E) | LS (E) | LS (E) |
| **Air Quality** | | | | |
| Air Quality Plan | SU | SU (E) | SU (G) | SU (L) |
| Air Quality Standards/Violations | SU | SU (E) | SU (G) | SU (L) |
| Criteria Pollutant | SU | SU (E) | SU (G) | SU (L) |
| Sensitive Receptors | LSM | LSM (E) | LSM (E) | LSM (E) |
| Other Emissions (Odors) | LS | LS (E) | LS (E) | LS (E) |
| **Cultural Resources** | | | | |
| Historical Resources | SU | SU (E) | SU (E) | SU (L) |
| Archaeological Resources | LSM | LSM (E) | LSM (E) | LSM (L) |
| Paleontological Resources | LSM | LSM (E) | LSM (E) | LSM (L) |
| Human Remains | LS | LS (E) | LS (E) | LS (L) |
| **Energy** | | | | |
| Wasteful, Inefficient, or Unnecessary Consumption | LS | LS (E) | LS (E) | LS (E) |
| Conflict with Renewable Energy or Energy Efficiency Plan | LS | LS (E) | LS (E) | LS (E) |
| **Geology and Soils** | | | | |
| Liquefaction and Lateral Spreading | LS | LS (E) | LS (E) | LS (E) |
| Soil Erosion or Topsoil Loss | LS | LS (E) | LS (E) | LS (E) |
| Geologic Instability | LS | LS (E) | LS (E) | LS (E) |
| Expansive Soil | LS | LS (E) | LS (E) | LS (E) |
| **Greenhouse Gases** | | | | |
| Greenhouse Gas Emissions | LSM | LSM (E) | LSM (G) | LSM (L) |
| Conflict with Plan, Policy, or Regulation that Reduces Greenhouse Gas Emissions | LS | LS (E) | LS (E) | LS (E) |

| Environmental Issue | Proposed Project | Alternative 1: No Project/Development in Accordance with Existing Zoning | Alternative 2: Firestone TOD Modified Land Use | Alternative 3: Slauson TOD Focused |
|---|---|---|---|---|
| **Hazards and Hazardous Materials** | | | | |
| Routine Transport, Storage, Production, Use, or Disposal | LS | LS (E) | LS (E) | LS (E) |
| Accident Conditions | LSM | LSM (E) | LSM (E) | LSM (E) |
| Sensitive Land Uses | LS | LS (E) | LS (E) | LS (E) |
| Hazardous Materials Site Listing | LSM | LSM (E) | LSM (E) | LSM (E) |
| Emergency Response Plan or Emergency Evacuation Plan | LS | LS (E) | LS (E) | LS (E) |
| **Hydrology and Water Quality** | | | | |
| Water Quality Standards/Waste Discharge Requirements | LS | LS (E) | LS (E) | LS (E) |
| Groundwater Supplies and Recharge | LS | LS (E) | LS (E) | LS (E) |
| Alter Existing Drainage Pattern: Resulting in Erosion or Siltation | LS | LS (E) | LS (E) | LS (E) |
| Alter Existing Drainage Pattern: Resulting in Flooding | LS | LS (E) | LS (E) | LS (E) |
| Alter Existing Drainage Pattern: Resulting in Exceedance of Stormwater Drainage System Capacity | LSM | LSM (E) | LSM (E) | LSM (E) |
| Water Quality Control Plan or Sustainable Groundwater Management Plan | LS | LS (E) | LS (E) | LS (E) |
| **Land Use and Planning** | | | | |
| Conflict with Applicable Plans, Policies, or Regulations | LS | LS (E) | LS (E) | LS (E) |
| **Noise** | | | | |
| Noise Levels in Excess of Standards | LSM | LSM (E) | LSM (G) | LSM (L) |
| Excessive Ground-Borne Vibration | LSM | LSM (E) | LSM (G) | LSM (L) |
| **Population and Housing** | | | | |
| Population Growth | LS | LS (E) | LS (E) | LS (E) |
| Displace People or Housing | LS | LS (E) | LS (E) | LS (E) |
| **Public Services** | | | | |
| Fire Protection Services | LS | LS (L) | LS (E) | LS (L) |
| Police Protection Services | LS | LS (L) | LS (E) | LS (L) |
| School Facilities | LS | LS (L) | LS (E) | LS (L) |
| Library Facilities | LS | LS (L) | LS (E) | LS (L) |

| Environmental Issue | Proposed Project | Alternative 1: No Project/Development in Accordance with Existing Zoning | Alternative 2: Firestone TOD Modified Land Use | Alternative 3: Slauson TOD Focused |
|---|---|---|---|---|
| Other Public Facilities | NI | NI (E) | NI (E) | NI (E) |
| **Recreation** | | | | |
| Increase Use of Recreational Facilities | LS | LS (L) | LS (E) | LS (E) |
| Recreational Facilities Physical Effect on the Environment | LS | LS (E) | LS (E) | LS (E) |
| Provision or Need for New or Physically Altered Parks | LS | LS (L) | LS (G) | LS (L) |
| **Transportation** | | | | |
| Conflict with Program, Plan, Ordinance, or Policy Addressing the Circulation System | LS | LS (G) | LS (E) | LS (E) |
| Conflict/Inconsistent with CEQA Guidelines Section 15064.3, Subdivision(b) | LS | LS (G) | LS (E) | LS (E) |
| Hazards/Incompatible Uses | LS | LS (G) | LS (E) | LS (E) |
| Emergency Access | LS | LS (G) | LS (E) | LS (E) |
| **Tribal Cultural Resources** | | | | |
| Listed or Eligible for Listing in the California Register of Historical Resources/Local Register of Historical Resources | LSM | LSM (E) | LSM (E) | LSM (E) |
| Resource Determined by the Lead Agency | LSM | LSM (E) | LSM (E) | LSM (E) |
| **Utilities and Service Systems** | | | | |
| Water, Wastewater Treatment, Storm Water Drainage, Electric Power, Natural Gas, or Telecommunication Facilities | LSM | LSM (L) | LSM (G) | LSM (L) |
| Water Supplies | LSM | LSM (L) | LSM (G) | LSM (L) |
| Wastewater Treatment Capacity | LSM | LSM (L) | LSM (G) | LSM (L) |
| Solid Waste Standards | LS | LS (L) | LS (G) | LS (L) |
| Compliance with Solid Waste Regulations and Statutes | LS | LS (E) | LS (E) | LS (E) |

Notes:
NI = No Impact
LS = Less than Significant
LSM = Less than Significant with Mitigation
SU = Significant and Unavoidable
(L) = Less than Project
(G) = Greater than Project
(E) = Equivalent to Project

### 4.5.1 Alternative 1: No Project/Development in Accordance with Existing Zoning

The following discusses the impacts associated with the No Project Alternative (Development in Accordance with Existing Zoning) and Alternative 1, in comparison to the impacts of the proposed FFTOD Specific Plan.

#### Aesthetics

Under the No Project/Development in Accordance with Existing Zoning Alternative, fewer residential units and an increase in nonresidential uses would be implemented compared to the proposed project. Development under this alternative would not affect identified or designated scenic views or a scenic vista because neither exists in the project vicinity. Therefore, similar to the proposed project, the implementation of this alternative would not impact a scenic view or scenic vista.

Redevelopment of existing and/or new buildings would be designed based on the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP and overall development would not degrade the existing visual character of the highly urbanized Florence-Firestone community. As such, Alternative 1 would not substantially degrade the existing visual character or quality of public views of the Florence-Firestone community or its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts associated with this alternative related to scenic view or vista and visual character would be less than significant similar to the proposed project.

Development under this alternative would be similar to the proposed project and introduce new lighting and glare throughout the development such as streetlights, parking lots, signs, walkways, and large expanses of glazing (e.g., glass windows) and building materials (e.g., reflective metal treatments). However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with Alternative 1 would be typical of the surrounding area and what is expected for an urban, transit-oriented community. Similar to the proposed project, this alternative would comply with the Los Angeles County Code and California Building Energy Efficiency Standards that would be checked by Los Angeles County through the development plan check process. Therefore, impacts associated with this alternative related to increased sources of light and glare would be less than significant similar to the proposed project.

#### Air Quality

The No Project/Development in Accordance with Existing Zoning Alternative would not result in changes to existing zoning. The regional emissions inventory for the SCAB is compiled by the SCAQMD and SCAG. Regional population, housing, and employment projections developed by SCAG are based, in part, on the local jurisdictions' general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP. These demographic trends are incorporated into the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; "Connect SoCal"), compiled by SCAG to determine priority transportation projects and vehicle miles traveled (VMT) within the SCAG region. Projects that are consistent with the local general plan are considered consistent with the air quality–related regional plan. Typically, only new or amended general plan elements, specific plans, and major

projects that have the potential to affect the regional population and employment forecasts need to undergo a consistency review.

Development under the existing General Plan would decrease development potential by 10,621 units but increase the amount of nonresidential use by 563,757 square feet. Project-related daily VMT and associated mobile-source emissions would not necessarily be reduced as opportunities for affordable housing, transit oriented development, active transportation, improved access to transit would not be as focused in the FFTOD Specific Plan Area. Furthermore, even though stationary-source emissions would be reduced because there would be less residential development, the increase in nonresidential development may neutralize the reduction. Therefore, Alternative 1 would not eliminate significant short- and long-term criteria air pollutant emissions that would exceed SCAQMD's regional significance thresholds and localized significance thresholds. However, it would be consistent with SCAQMD's AQMP since population and employment assumptions used to develop the regional emissions inventory in the latest AQMP are based on the existing General Plan. The implementation of project mitigation measures identified for the proposed project would not reduce mobile- and stationary-source emissions and criteria air pollutants from construction and operation activities and would still result in significant and unavoidable impacts related to air quality similar to the proposed project.

### Cultural Resources

Implementation of this alternative has the potential to result in demolition or modification of existing or future eligible state or local historic resources similar to the proposed project. The FFTOD Specific Plan Area includes five National Register of Historic Places eligible resources. There are also numerous residential and commercial buildings that are older than 50 years or buildings that could be older than 50 years prior to construction activities. With the implementation of measures similar to the project mitigation measures, potential impacts on historic resources would be reduced; however, because the measures describe a reduction of the impacts to the maximum extent practicable and not guarantee full mitigation, impacts to eligible historic resources could remain significant similar to the proposed project. Construction activities associated with this Alternative could unearth previously unknown and unrecorded archaeological and tribal cultural resources and potential paleontological resources that could be located in the subsurface older Quaternary deposits that are known to contain vertebrate fossils similar to the proposed project. The implementation of the mitigation measures identified for the proposed project would reduce potential archaeological and paleontological impacts associated with this alternative to less than significant similar to the proposed project.

### Energy

Operational transportation would be the greatest energy consuming factor associated with implementation of Alternative 1. Although Alternative 1 would provide for an increase in employment-generating land uses, it would result in fewer housing options and implement the existing land use and transportation planning strategies that would not reduce the demand for motor vehicle travel, and thereby would not minimize overall transportation energy (fuel) demands. Compliance with existing regulations and building codes, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities under Alternative 1 would be energy efficient and thus would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy nor would Alternative 1 conflict with or obstruct a State or

local plan for renewable energy or energy efficiency. Impacts would be less than significant similar to the proposed project.

### Geology and Soils

Implementation of development in accordance with this alternative would expose people and structures to strong seismic ground shaking. However, similar to the proposed project, conformance with the California Building Code (CBC) would reduce impacts to strong seismic ground shaking to the maximum extent possible under currently accepted engineering practices. Therefore, similar to the proposed project, this alternative would result in less than significant impacts related to exposing people or structures to strong seismic ground shaking. Construction and operational activities associated with this alternative could result in soil erosion or loss of top soil; however, compliance with the Construction General Permit, municipal separate storm sewer systems (MS4) Permit, and the County's Low Impact Development (LID) Standards would reduce soil erosion and loss of topsoil during construction and operational activities to less than significant similar to the proposed project. Development in the project area could also be exposed to geologic hazards; however, compliance with the CBC, Los Angeles County ordinances, and the Los Angeles County building code requirements would reduce potential hazards such as unstable soils, liquefaction, lateral spreading, settlement, subsidence, and collapse to less than significant similar to the proposed project.

### Greenhouse Gases

Alternative 1 would contribute to global climate change through direct and indirect emissions of greenhouse gases (GHG) from construction and operation of the land uses within the FFTOD Specific Plan Area. Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the proposed project would result in exhaust-related GHG emissions and day-to-day activities associated with operation of the project would generate emissions from a variety of sources. This Alternative would result in fewer residential units, but would have more nonresidential square footage compared to the proposed project. The proposed project would exceed the local service population efficiency 2035 target and would result in a cumulative contribution to the long-term GHG emissions in the state. However, implementation of programmatic mitigation measures would reduce impacts to a less than significant level. Therefore, GHG emissions that would result from Alternative 1 would be less than significant with mitigation and would be similar to the implementation of the proposed project.

Similar to the proposed Project, this Alternative would not exceed the 2020 GHG threshold which would achieve the Assembly Bill (AB) 32 GHG reduction goals. In addition, this Alternative would be consistent with the California Air Resources Board (CARB) Scoping Plan and could be consistent with the SCAG SCS GHG emissions reduction policies. Therefore, similar to the proposed Project, this Alternative would result in less than significant impacts related to compliance with AB 32, CARB Scoping Plan, and the SCAG SCS GHG emissions reduction policies.

### Hazards and Hazardous Materials

Development in accordance with Alternative 1 would involve demolition and construction of new buildings that could include the use of substances such as paints, sealants, solvents, adhesives,

cleaners, and diesel fuel similar to the proposed project. There is potential for these materials to spill or to create hazardous conditions. However, the Alternative would be required to comply with existing regulations, including those set forth by the California Division of Occupational Safety and Health (Cal/OSHA), Los Angeles County Fire Department (LACoFD), U.S. Department of Transportation (USDOT), and the California Department of Transportation (Caltrans). Compliance with existing regulations would ensure that construction and operation activities of future development projects related to implementation under this Alternative would result in less than significant impacts related to posing substantial hazards to the public or the environment, similar to the proposed project.

Because of the age of buildings within the FFTOD Specific Plan Area and because the area has land uses that could generate a variety of potential sources of contamination, a variety of potential sources of contamination exists. Implementation of development in accordance with this Alternative could expose unknown soil contamination, disturb or uncover unidentified underground storage tanks (USTs), or expose or disturb asbestos containing asbestos-containing materials (ACMs) and lead-based paint (LBP) during construction activities, similar to the proposed project. Implementation of programmatic mitigation would reduce potential impacts related to accident conditions involving the release of hazardous materials into the environment to less than significant, similar to the proposed project.

Development in accordance with this Alternative would result in usage and storage of hazardous materials onsite and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions and the proposed project, which could emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur, and impacts would be less than significant similar to the proposed project.

Redevelopment of individual properties within the FFTOD Specific Plan Area under this Alternative could have unknown recognized environmental conditions related to soils, groundwater, and vapors/gases, and could be located on a hazardous materials site, similar to the proposed project. With the implementation of the project's programmatic mitigation measures, potential impacts on related to creating a significant hazard to the public or the environment would be reduced, similar to the proposed project.

Similar to the proposed project, this Alternative would result in construction traffic that could temporarily impede emergency access to and within the FFTOD Specific Plan Area. However, implementation of this Alternative is not anticipated to include any roadway changes and improvements that would result in inadequate emergency access, and impacts would be less than significant, similar to the proposed project.

### Hydrology and Water Quality

Development under Alternative 1 would include demolition and grading activities that could expose and loosen sediment and building materials that could mix with storm water and urban runoff. Because each individual project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) and implement a Stormwater Pollution Prevention Plan (SWPPP) if the project disturbs more than one acre, the potential for pollutants to substantially

degrade downstream surface water quality would be less than significant. Projects disturbing less than an acre of ground surface during construction would not be required to prepare a SWPPP, but would be required to implement the minimum best management practices (BMPs) required by the Los Angeles County MS4 Permit to prevent water quality degradation and therefore, impacts would be less than significant. Construction impacts related to water quality standards or waste discharge requirements from implementation of the Alternative would be less than significant, similar to the proposed project.

Operational activities associated with this Alternative would be required to meet MS4 Permit requirements through compliance with the County LID Standards Manual. Compliance with the MS4 Permit regulations would minimize pollutants being transported offsite into downstream receiving waters, and projects implemented in accordance with this Alternative would not violate water quality standards or waste discharge requirements, similar to the proposed project.

Similar to the proposed project, this Alternative includes infill and redevelopment and would increase population; thereby increase demand on water supplies. Because the water purveyors that serve the FFTOD Specific Plan Area have pumping rights to obtain their groundwater from the Central Groundwater Basin, compliance with the judgment that set pumping rights in the Basin would eliminate the potential for the water agencies to substantially impact groundwater supplies. Therefore, similar to the proposed project, the implementation of this Alternative would result in less than significant impacts on the Central Groundwater Basin from groundwater use. The FFTOD Specific Plan Area does not have much groundwater recharge potential, and this Alternative would not include excavation activities that would reach the existing groundwater level of approximately 160 to 200 feet below ground surface. Therefore, this Alternative would result in less than significant impacts to the existing groundwater levels similar to the proposed project.

Construction and operational activities associated with this Alternative would result in the potential for erosion and siltation impacts. However, construction activities would be required to implement BMPs required by the Construction General Permit, MS4 Permit regulations, and County Pollution Control Requirements for Construction Activities. Operational activities would be required to implement the Los Angeles County LID Standards Manual. With compliance with these regulations, the implementation of development in accordance with this Alternative would result in a less than significant erosion and siltation impact during construction and operational activities, similar to the proposed project.

Development in accordance with this Alternative would result in the generation of little to no increase in runoff to the existing drainage system because the majority of the site is developed and approximately 80 to 90 percent of the site is impervious. Although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff. Implementation of the project's programmatic mitigation would be required. Therefore, similar to the proposed project, this Alternative would result in less than significant impacts on existing and planned storm drains. Furthermore, as stated above, this Alternative's compliance with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the Los Angeles County LID Standards Manual would result in less than significant impacts related to the creation of polluted runoff, similar to the proposed project.

Development in accordance with this Alternative would be required to comply with the local water management plan, and therefore, would result in less than significant impacts related to conflict with a water quality control plan or sustainable groundwater management plan, similar to the proposed project.

### Land Use and Planning

Under this Alternative, the project area would not result in changes to existing zoning or land uses and would reduce the density and intensity of development as compared to the proposed project. Development in accordance with this Alternative would not include transit-oriented development that provides for cohesive development throughout the project area. With the absence of a Specific Plan, this Alternative would need to implement TOD features on a project-by-project basis which would not provide for a cohesive future land use plan that would maximize TOD land use and circulation opportunities. This alternative would not implement the pedestrian and bicycle circulation patterns identified in the proposed Specific Plan to improve access to the three LA Metro A (Blue) Line stations. In addition, this alternative would not implement SCAG policies to the extent that the proposed project is implementing these policies that encourage greater densities in areas with TOD opportunities and less dependence on the automobile. This alternative would, however, be consistent with the General Plan land uses, but would not achieve consistency with land use policies and goals to the same degree when compared to the proposed project. Because this Alternative would implement the County zoning for the project area, this Alternative would not conflict with the Zoning Ordinance. Therefore, this Alternative would result in less than significant impacts to conflicts with applicable plans, policies, and regulations similar to the proposed project.

### Noise

This Alternative would develop fewer housing units and more nonresidential square footage than the proposed project. The land uses (i.e., residential, mixed-use, and commercial uses) that would be implemented under this Alternative would be similar to those that would be implemented with the proposed project. Because this Alternative would result in fewer residential units, but more less nonresidential square feet compared to the proposed project, this Alternative may result in similar construction and operational noise levels as the proposed project. This alternative would likely exceed noise standards and potentially expose sensitive uses to significant ground-borne vibrations; however, this alternative's significant noise and vibration impacts would be reduced to less than significant with the implementation of the project's programmatic mitigation measures similar to the proposed project.

### Population and Housing

Under this Alternative, 10,621 fewer residential units and 563,757 additional square feet of nonresidential space than buildout of the proposed FFTOD Specific Plan would occur. The decrease in residential and increase in employment population that would be generated by this Alternative would be consistent with the SCAG growth forecasts for the site. The increase in population that would be generated by the proposed Project would also be consistent with SCAG forecasts. With the increase in jobs in the FFTOD Specific Plan Area under this Alternative, the majority of the jobs created within the area would be skilled or managerial, and a majority of these jobs are expected to be filled by persons outside of the area similar to the proposed project. Jobs

are anticipated to be filled by people within Los Angeles County due to the accessibility to the three Metro Stations and multiple freeways, and the larger available labor force within Los Angeles County. Therefore, the implementation of this Alternative would not substantially increase residential and employment population growth, and therefore, impacts would be less than significant similar to the proposed project.

### Public Services

Under this Alternative, 10,621 fewer residential units and 563,757 additional square feet of nonresidential space than buildout of the proposed FFTOD Specific Plan would occur. The County fire stations serving the FFTOD Specific Plan Area could increase staffing and equipment required for buildout of this Alternative, but it would be to a lesser degree when compared to the proposed project. This increase in staffing and equipment is expected to occur by utilizing the existing fire stations. Development in accordance with this Alternative as well as the proposed project would be accommodated by the existing fire stations without altering the existing facilities. Therefore, physical impacts to the environment related to the development of or expansion of fire department facilities would not occur.

Development of this Alternative would increase the need for additional officers to respond to additional calls for sheriff services, but to a lesser degree when compared to the proposed project. Development under this Alternative is expected to require additional officers that could be accommodated at existing Sheriff Department facilities. The demand for additional officers under this Alternative would not require the alteration of existing sheriff facilities. Therefore, physical impacts to the environment related to the development of or expansion of sheriff department facilities would not occur.

This Alternative would increase the number of students in the FFTOD Specific Plan Area, but to a lesser degree when compared to the proposed project. The additional students would result in less than significant impacts to school facilities as the proposed project.

Under this Alternative, 10,621 fewer units would be implemented, resulting in a decreased population of 34,351 people, compared to the proposed project. This decreased population would also result in a decreased demand for parks and recreation, library, and other public facilities. This Alternative would not require new or altered parks and recreation, library, and other public facilities similar to the proposed project. Therefore, the implementation of this Alternative would result in no impacts caused by construction impacts associated with new or altered parks and recreation, library, and other public facilities.

### Recreation

Under this Alternative, 10,621 fewer units would be implemented, resulting in a decreased population of 34,351 people, compared to the proposed project. This decreased population would also result in a decreased demand for and use of recreational facilities compared to the proposed project. The FFTOD Specific Plan Area is almost entirely built out with urban uses, and there is very little vacant unincorporated land that could be developed as parkland to serve the Florence-Firestone community. Thus, it is expected that residential developments would likely be required to pay in-lieu fees rather than dedicate parkland. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of this Alternative.

Therefore, less than the proposed project, this Alternative would result in less than significant impacts related to the need to construct new or physically alter recreational facilities.

Similar to the proposed project, there is no specific zone pertaining to park or open space uses under this Alternative. Buildout of this Alternative would include pedestrian and bicycle infrastructure for mobility improvements, similar to the proposed project, and would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under this Alternative. Similar to the proposed project, this Alternative would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and the impact would be less than significant.

The implementation of this Alternative would result in less development and residential population compared to the proposed project, resulting in decreased demand for parks and recreational facilities. Less than the proposed project, this Alternative would not require new or altered parks and recreation facilities. Therefore, the implementation of this Alternative would result in less than significant impacts caused by construction impacts associated with new or altered parks and recreational facilities.

### Transportation

Buildout of the Existing General Plan without the proposed Specific Plan would result in 10,621 fewer residential units but 563,757 additional square feet of nonresidential development. Development under the existing General Plan also would not take into account the TOD-focused nature of the proposed project; therefore, this Alternative would not complement the goals, policies, and programs addressing the safety or performance of the circulation system (including transit, roadways, bicycle lanes, and pedestrian paths) when compared to the proposed project, which include the Connect SoCal (the SCAG RTP/SCS), the Florence-Firestone Community Plan, the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County.

Additionally, this alternative would not implement a number of beneficial elements that would occur under the proposed project, including enhancements to the Specific Plan area's mobility and streetscape and complete streets network. The FFTOD Specific Plan includes a number of goals and policies and development standards that would enhance the project area's transportation system for vehicles, pedestrians, bicyclists, and transit users that the existing General Plan does not address. As such, Alternative 1 would have a higher total daily VMT per service population than the proposed project. Additionally, Alternative 1 would not introduce new design hazards or incompatible uses at intersections or along roadway segments or result in inadequate emergency access. Overall transportation and traffic impacts would be less than significant, but impacts with respect to the circulation system, VMT per service population, land use compatibility/mobility, and access would be greater than the proposed project.

### Tribal Cultural Resources

Construction activities associated with this Alternative could unearth previously unknown and unrecorded archaeological and tribal cultural resources similar to the proposed project. The implementation of the programmatic mitigation measures identified for the proposed project would

reduce potential tribal cultural impacts associated with this alternative to less than significant similar to the proposed project.

### Utilities and Service Systems

Buildout of the Alternative 1 would result in 10,621 fewer residential units but 563,757 additional square feet of nonresidential development. The decrease in residential density would result in decreased demand for potential wastewater and water usage including potable water and fire prevention demand, electricity, natural gas, telecommunications, and solid waste services; however, the increase in nonresidential uses would offset some of the reduction in potential demands. Additionally, this Alternative would generate little increase in runoff to the existing drainage system because the area is completely developed, and projects would be required to incorporate LID practices. With the implementation of the programmatic mitigation measures identified for the proposed project, impacts to utilities and service systems associated with this Alternative would be less than significant, and would be less than the proposed project.

### Conclusion

Potential impacts associated with the implementation of development under Alternative 1 are compared to the potential impacts of development in accordance with the proposed FFTOD Specific Plan. Alternative 1 would reduce impacts to public services, recreation, and utilities and service systems. Impacts to transportation would be greater and impacts to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain. The alternative would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system.

The implementation of this alternative would result in less environmental impacts compared to the proposed project and would not be able to achieve as many of the project objectives as the FFTOD Specific Plan. This alternative would not result in changes to existing zoning or meet the objectives of enabling more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone), or reduce vehicle miles traveled because these improvements would not be comprehensively and cohesively implemented in accordance with a uniform design guideline such as the proposed FFTOD Specific Plan.

## 4.5.2 Alternative 2: Firestone TOD Modified Land Use

The impacts associated with Alternative 2, Firestone TOD Modified Land Use, in comparison to the impacts of the proposed Specific Plan are described below.

### Aesthetics

Under the Firestone TOD Modified Land Use Alternative, an additional 64 residential units and 48,595 nonresidential square feet would be implemented compared to the proposed project. However, development under this alternative would not affect identified or designated scenic views or a scenic vista because neither exists in the project vicinity. Therefore, similar to the

proposed project, the implementation of this alternative would not impact a scenic view or scenic vista.

Development under this alternative would result in expanded implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street. Even with increased zoning under this alternative, redevelopment of existing and/or new buildings would be consistent with and provide a framework for implementing the goals, land uses, and policies based on the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP. Overall development would not degrade the existing visual character of the highly urbanized Florence-Firestone community. As such, Alternative 2 would not substantially degrade the existing visual character or quality of public views of the Florence-Firestone community or its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts associated with this alternative related to scenic view or vista and visual character would be less than significant similar to the proposed project.

Development under this alternative would be similar to the proposed project and introduce new lighting and glare throughout the development such as streetlights, parking lots, signs, walkways, and large expanses of glazing (e.g., glass windows) and building materials (e.g., reflective metal treatments). However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with Alternative 2 would be typical of the surrounding area and what is expected for an urban, transit-oriented community. Similar to the proposed project, this alternative would comply with the Los Angeles County Code and California Building Energy Efficiency Standards that would be checked by Los Angeles County through the development plan check process. Therefore, impacts associated with this alternative related to increased sources of light and glare would be less than significant similar to the proposed project.

### Air Quality

Alternative 2 would result in an additional 64 residential units and 48,595 nonresidential square feet to allow for expanded density through the implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street. This increase in proposed development would increase project-related VMT and associated mobile-source emissions. Thus, construction and operational emissions would still exceed SCAQMD's regional significance thresholds. Similarly, this alternative would not be consistent with the SCAQMD's AQMP since population and employment assumptions used to develop the regional emissions inventory in the latest AQMP are based on the existing General Plan, which has a further reduced development potential compared to this alternative. Therefore, impacts associated with this alternative related to air quality would be significant and unavoidable greater than the proposed project.

### Cultural Resources

Implementation of Alternative 2 has the potential to result in demolition or modification of existing or future eligible state or local historic resources similar to the proposed Project. The FFTOD Specific Plan Area includes five NRHP eligible resources. There are also numerous residential and commercial buildings that are older than 50 years or buildings that could be older than 50 years prior to construction activities. With the implementation of the Project programmatic mitigation measures, potential impacts on historic resources would be reduced; however, because the measures describe a reduction of the impacts to the maximum extent practicable and not guarantee

full mitigation, impacts to eligible historic resources could remain significant and unavoidable, similar to the proposed Project.

Construction activities associated with this Alternative could unearth previously unknown and unrecorded archaeological resources and potential paleontological resources that could be located in the subsurface older Quaternary deposits that are known to contain vertebrate fossils, similar to the proposed Project. The implementation of the mitigation measures identified for the proposed Project would reduce potential archaeological and paleontological impacts associated with this Alternative to less than significant similar to the proposed project.

### Energy

Alternative 2 would provide for an increase in employment-generating land uses, encourage a range of housing options, and implement land use and transportation planning strategies that would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands. Compliance with existing regulations and building codes, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities under Alternative 2 would be energy efficient and thus would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy nor would Alternative 2 conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant similar to the proposed project.

### Geology and Soils

Implementation of development in accordance with this Alternative would expose people and structures to strong seismic ground shaking. However, similar to the proposed Project, conformance with the CBC would reduce impacts to strong seismic ground shaking to the maximum extent possible under currently accepted engineering practices. Therefore, similar to the proposed Project, this Alternative would result in less than significant impacts related to exposing people or structures to strong seismic ground shaking. Construction and operational activities associated with this Alternative could result in soil erosion or loss of top soil; however, compliance with the Construction General Permit, MS4 Permit, and the County's LID Standards would reduce soil erosion and loss of topsoil during construction and operational activities to less than significant similar to the proposed Project. Development in the project area could also be exposed to geologic hazards; however, compliance with the CBC, Los Angeles County ordinances, and the Los Angeles County building code requirements would reduce potential hazards such as unstable soils, liquefaction, lateral spreading, settlement, subsidence, and collapse to less than significant similar to the proposed project.

### Greenhouse Gases

Alternative 2 would contribute to global climate change through direct and indirect emissions of GHG from construction and operation of the land uses within the FFTOD Specific Plan Area. Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the proposed project would result in exhaust-related GHG emissions and day-to-day activities associated with operation of the project would generate emissions from a variety of sources. This Alternative would result in more residential units and nonresidential square footage compared to the proposed project. The proposed project would exceed the local service population efficiency

2035 target and would result in a cumulative contribution to the long-term GHG emissions in the state. However, implementation of programmatic mitigation measures would reduce impacts to a less than significant level. Therefore, GHG emissions that would result from Alternative 2 would be less than significant with mitigation but would be greater than the implementation of the proposed project.

Similar to the proposed Project, this Alternative would not exceed the 2020 GHG threshold which would achieve the AB 32 GHG reduction goals. In addition, this Alternative would be consistent with the CARB Scoping Plan and could be consistent with the SCAG SCS GHG emissions reduction policies. Therefore, similar to the proposed Project, this Alternative would result in less than significant impacts related to compliance with AB 32, CARB Scoping Plan, and the SCAG SCS GHG emissions reduction policies.

### Hazards and Hazardous Materials

Development in accordance with Alternative 2 would involve demolition and construction of new buildings that could include the use of substances such as paints, sealants, solvents, adhesives, cleaners, and diesel fuel similar to the proposed project. There is potential for these materials to spill or to create hazardous conditions. However, Alternative 2 would be required to comply with existing regulations, including those set forth by Cal/OSHA, LACoFD, USDOT, and Caltrans. Compliance with existing regulations would ensure that construction and operation activities of future development projects related to implementation under this Alternative would result in less than significant impacts related to posing substantial hazards to the public or the environment, similar to the proposed project.

Because of the age of buildings within the FFTOD Specific Plan Area and because the area has land uses that could generate a variety of potential sources of contamination, a variety of potential sources of contamination exists. Implementation of development in accordance with this Alternative could expose unknown soil contamination, disturb or uncover unidentified USTs, or expose or disturb asbestos containing ACMs and LBP during construction activities, similar to the proposed Project. Implementation of the project's programmatic mitigation would reduce potential impacts related to accident conditions involving the release of hazardous materials into the environment to less than significant, similar to the proposed project.

Development in accordance with this Alternative would result in usage and storage of hazardous materials onsite and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions and the proposed project, which could emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur, and impacts would be less than significant similar to the proposed project.

Redevelopment of individual properties within the FFTOD Specific Plan Area under this Alternative could have unknown recognized environmental conditions related to soils, groundwater, and vapors/gases, and could be located on a hazardous materials site, similar to the proposed project. With the implementation of the project's programmatic mitigation measures, potential impacts on related to creating a significant hazard to the public or the environment would be reduced, similar to the proposed project.

Similar to the proposed project, this Alternative would result in construction traffic that could temporarily impede emergency access to and within the FFTOD Specific Plan Area. However, implementation of this Alternative is not anticipated to include any roadway changes and improvements that would result in inadequate emergency access, and impacts would be less than significant, similar to the proposed project.

### Hydrology and Water Quality

Development under Alternative 2 would include demolition and grading activities that could expose and loosen sediment and building materials that could mix with storm water and urban runoff. Because each individual project would be required to comply with the NPDES and implement a SWPPP if the project disturbs more than one acre, the potential for pollutants to substantially degrade downstream surface water quality would be less than significant. Projects disturbing less than an acre of ground surface during construction would not be required to prepare a SWPPP, but would be required to implement the minimum BMPs required by the Los Angeles County MS4 Permit to prevent water quality degradation and therefore, impacts would be less than significant. Construction impacts related to water quality standards or waste discharge requirements from implementation of the Alternative would be less than significant, similar to the proposed project.

Operational activities associated with this Alternative would be required to meet MS4 Permit requirements through compliance with the County LID Standards Manual. Compliance with the MS4 Permit regulations would minimize pollutants being transported offsite into downstream receiving waters, and projects implemented in accordance with this Alternative would not violate water quality standards or waste discharge requirements, similar to the proposed project.

Similar to the proposed project, this Alternative includes infill and redevelopment and would increase population; thereby increase demand on water supplies. Because the water purveyors that serve the FFTOD Specific Plan Area have pumping rights to obtain their groundwater from the Central Groundwater Basin, compliance with the judgment that set pumping rights in the Basin would eliminate the potential for the water agencies to substantially impact groundwater supplies. Therefore, similar to the proposed project, the implementation of this Alternative would result in less than significant impacts on the Central Groundwater Basin from groundwater use. The FFTOD Specific Plan Area does not have much groundwater recharge potential, and this Alternative would not include excavation activities that would reach the existing groundwater level of approximately 160 to 200 feet below ground surface. Therefore, this Alternative would result in less than significant impacts to the existing groundwater levels similar to the proposed project.

Construction and operational activities associated with this Alternative would result in the potential for erosion and siltation impacts. However, construction activities would be required to implement BMPs required by the Construction General Permit, MS4 Permit regulations, and County Pollution Control Requirements for Construction Activities. Operational activities would be required to implement the Los Angeles County LID Standards Manual. With compliance with these regulations, the implementation of development in accordance with this Alternative would result in a less than significant erosion and siltation impact during construction and operational activities, similar to the proposed project.

Development in accordance with this Alternative would result in the generation of little to no increase in runoff to the existing drainage system because the majority of the site is developed and approximately 80 to 90 percent of the site is impervious. Although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff. Implementation of the project's programmatic mitigation would be required. Therefore, similar to the proposed project, this Alternative would result in less than significant impacts on existing and planned storm drains. Furthermore, as stated above, this Alternative's compliance with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the Los Angeles County LID Standards Manual would result in less than significant impacts related to the creation of polluted runoff, similar to the proposed project.

Development in accordance with this Alternative would be required to comply with the local water management plan, and therefore, would result in less than significant impacts related to conflict with a water quality control plan or sustainable groundwater management plan, similar to the proposed project.

### Land Use and Planning

Under this Alternative, the project area would increase the density and intensity of development as well as the presence of pedestrians throughout the area. Development in accordance with this Alternative includes transit-oriented development that provides for cohesive development throughout the project area similar to the proposed project. This alternative would implement the pedestrian and bicycle circulation patterns identified in the proposed Specific Plan to improve access to the three LA Metro A (Blue) Line stations. In addition, this alternative would implement SCAG policies that encourage greater densities in areas with TOD opportunities and less dependence on the automobile. This alternative would, however, not be consistent with the General Plan land uses similar to the proposed project. Overall, this Alternative would result in less than significant impacts related to land use policies similar to the proposed project. Because the proposed Specific Plan would implement the County's plans and planning concepts of implementing a TOD in the project area, this Alternative, similar to the proposed project, would result in less than significant environmental impacts related to consistency with establish development regulations.

### Noise

This Alternative would result in more development compared to the proposed project. The land uses that would be implemented under this Alternative would be similar to those that would be implemented with the proposed project. These land uses include residential, mixed-use, and commercial uses. Because this Alternative would result in more residential units and more nonresidential square feet compared to the proposed project, this Alternative would result in more construction and operational noise levels. This alternative would exceed noise standards and potentially expose sensitive uses to significant ground-borne vibrations. These potential noise and vibration impacts would be greater than the proposed project's impacts; however, this alternative's significant noise and vibration impacts would be reduced to less than significant with the implementation of the project's programmatic mitigation measures.

## Population and Housing

Under this Alternative, 64 more residential units and 48,595 additional square feet of nonresidential space than buildout of the proposed FFTOD Specific Plan would occur. The increase in population that would be generated by this Alternative would not be within the SCAG growth forecasts for the FFTOD Specific Plan area similar to the proposed project. With the increase in jobs in the FFTOD Specific Plan area under this Alternative, the majority of the jobs created would be skilled or managerial, and a majority of these jobs are expected to be filled by persons outside of the project area similar to the proposed project. Jobs are anticipated to be filled by people within Los Angeles County due to the accessibility to the three Metro Stations and multiple freeways, and the larger available labor force within Los Angeles County. Therefore, the implementation of this Alternative would not substantially increase residential and employment population growth, and therefore, impacts would be less than significant similar to the proposed project.

## Public Services

Under this Alternative, 64 more residential units and 48,595 additional square feet of nonresidential space than buildout of the proposed FFTOD Specific Plan would occur. Although this Alternative would have slightly more development compared to the proposed project, the County fire stations serving the FFTOD Specific Plan Area could increase staffing and equipment required for buildout of this Alternative similar to the proposed project. This increase in staffing and equipment is expected to occur by utilizing the existing fire stations. Development in accordance with this Alternative as well as the proposed project would be accommodated by the existing fire stations without altering the existing facilities. Therefore, physical impacts to the environment related to the development of or expansion of fire department facilities would not occur.

Development of this Alternative would increase the need for additional officers to respond to additional calls for sheriff services. The increase in additional officers would be slightly more than required for the proposed project. Development under this Alternative is expected to require additional officers that could be accommodated at existing Sheriff Department facilities. The demand for additional officers under this Alternative would not require the alteration of existing sheriff facilities. Therefore, physical impacts to the environment related to the development of or expansion of sheriff department facilities would not occur.

This Alternative would increase the number of students in the FFTOD Specific Plan Area, and this increase would be slightly more than the increase anticipated under the proposed project. Although slightly more students would be generated under this Alternative, the additional students would result in similar less than significant impacts to school facilities as the proposed project.

Implementation of this Alternative would increase the population in the project area and thereby increase a demand for parks and recreation, library, and other public facilities. Although this Alternative would result in slightly greater population compared to the proposed project, this Alternative would also not require new or altered parks and recreation, library, and other public facilities similar to the proposed project. Therefore, the implementation of this Alternative would result in no impacts caused by construction impacts associated with new or altered parks and recreation, library, and other public facilities.

## Recreation

Under this Alternative, 64 more units would be implemented, resulting in an increased population of 885 people, compared to the proposed project. This increased population would also result in an increased demand for and use of recreational facilities. The FFTOD Specific Plan Area is almost entirely built out with urban uses, and there is very little vacant unincorporated land that could be developed as parkland to serve the Florence-Firestone community. Thus, it is expected that residential developments would likely be required to pay in-lieu fees rather than dedicate parkland. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of this Alternative. Therefore, similar to the proposed project, this Alternative would result in less than significant impacts related to the need to construct new or physically alter recreational facilities.

Similar to the proposed project, there is no specific zone pertaining to park or open space uses under this Alternative. Buildout of this Alternative would include pedestrian and bicycle infrastructure for mobility improvements, similar to the proposed project, and would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under this Alternative. Similar to the proposed project, this Alternative would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and the impact would be less than significant.

The implementation of this Alternative would result in slightly more development and residential population compared to the proposed project, which would thereby increase the demand for parks and recreational facilities. Although this Alternative would result in slightly greater population compared to the proposed project, this Alternative would not require new or altered parks and recreation facilities similar to the proposed project. Therefore, the implementation of this Alternative would result in less than significant impacts caused by construction impacts associated with new or altered parks and recreational facilities.

## Transportation

Buildout of Alternative 2 would result in 64 additional residential units and 48,595 additional square feet of nonresidential development. This Alternative would allow for expanded density through the implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street and take into account the TOD-nature of the proposed project. Therefore, this Alternative would not conflict with the goal, policies, and programs addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths which include the Connect SoCal (the SCAG RTP/SCS), the Florence-Firestone Community Plan, the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County.

Additionally, this alternative would implement a number of beneficial elements that would occur under the proposed project, including enhancements to the Specific Plan area's mobility and streetscape and complete streets network. The FFTOD Specific Plan includes a number of goals and policies and development standards that would enhance the project area's transportation system for vehicles, pedestrians, bicyclists, and transit users that Alternative 2 would also address. Alternative 2 would have a similar total daily VMT per service population as the proposed project.

Additionally, Alternative 2 would not introduce new design hazards or incompatible uses at intersections or along roadway segments or result in inadequate emergency access. Thus, overall transportation and traffic impacts would be similar to the proposed project and result in less than significant impacts.

### Tribal Cultural Resources

Construction activities associated with this Alternative could unearth previously unknown and unrecorded archaeological and tribal cultural resources similar to the proposed project. The implementation of the programmatic mitigation measures identified for the proposed project would reduce potential tribal cultural impacts associated with this alternative to less than significant similar to the proposed project.

### Utilities and Service Systems

Buildout of the Alternative 2 would result in 64 additional residential units and 48,595 additional square feet of nonresidential development. The increase in residential density would result in increased demand for potential wastewater and water usage including potable water and fire prevention demand, electricity, natural gas, telecommunications, and solid waste services. Additionally, this Alternative would generate little increase in runoff to the existing drainage system because the area is completely developed, and projects would be required to incorporate LID practices. With the implementation of the programmatic mitigation measures identified for the proposed project, impacts to utilities and service systems associated with this Alternative would be less than significant, and would be greater than the proposed project.

### Conclusion

Potential impacts associated with the implementation of development under Alternative 2 are compared to the potential impacts of development in accordance with the proposed FFTOD Specific Plan. Alternative 2 would not reduce any impacts and would have greater impacts to air quality, greenhouse gases, noise, recreation, and utilities and service systems. Impacts to aesthetics, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain.

The implementation of this Alternative would result in slightly greater environmental impacts compared to the proposed Project. This Alternative would meet all of the objectives of the proposed project including the provision of a transit-oriented development in the project area and provision of an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements and would allow for expanded density through the implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street.

## 4.5.3 Alternative 3: Slauson TOD Focused

The impacts associated with Alternative 3, Slauson TOD Focused, in comparison to the impacts of the proposed Specific Plan are described below.

## Aesthetics

Under the Slauson TOD Focused Alternative, 2,684 fewer residential units and a decrease in nonresidential uses by 327,859 square feet would be implemented compared to the proposed project. However, development under this alternative would not affect identified or designated scenic views or a scenic vista because neither exists in the project vicinity. Therefore, similar to the proposed project, the implementation of this alternative would not impact a scenic view or scenic vista.

Development under this alternative would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. Redevelopment of existing and/or new buildings would be consistent with and provide a framework for implementing the goals, land uses, and policies based on the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP. Overall development would not degrade the existing visual character of the highly urbanized Florence-Firestone community. As such, Alternative 3 would not substantially degrade the existing visual character or quality of public views of the Florence-Firestone community or its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts associated with this alternative related to scenic view or vista and visual character would be less than significant similar to the proposed project.

Development under this alternative would be similar to the proposed project and introduce new lighting and glare throughout the development such as streetlights, parking lots, signs, walkways, and large expanses of glazing (e.g., glass windows) and building materials (e.g., reflective metal treatments). However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with Alternative 3 would be typical of the surrounding area and what is expected for an urban, transit-oriented community. Similar to the proposed project, this alternative would comply with the Los Angeles County Code and California Building Energy Efficiency Standards that would be checked by Los Angeles County through the development plan check process. Therefore, impacts associated with this alternative related to increased sources of light and glare would be less than significant similar to the proposed project.

## Air Quality

Alternative 3 would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites resulting in in 2,684 fewer residential units and a decrease in nonresidential uses by 327,859 square feet. This decrease in proposed development would further decrease project-related VMT and associated mobile-source emissions. However, construction and operational emissions would still exceed SCAQMD's regional significance thresholds. Similarly, this alternative would not be consistent with the SCAQMD's AQMP since population and employment assumptions used to develop the regional emissions inventory in the latest AQMP are based on the existing General Plan, which has a further reduced development potential compared to this alternative. Therefore, impacts associated with this alternative related to air quality would be significant and unavoidable less than the proposed project.

## Cultural Resources

Implementation of Alternative 3 has the potential to result in demolition or modification of existing or future eligible state or local historic resources similar to the proposed Project. Because less development would occur under this Alternative compared to the proposed project, this Alternative would result in less potential impacts on eligible historic resources. There are also numerous residential and commercial buildings that are older than 50 years or buildings that could be older than 50 years prior to construction activities. With the implementation of the Project mitigation measures, potential impacts on historic resources would be reduced; however, because the measures describe a reduction of the impacts to the maximum extent practicable and not guarantee full mitigation, impacts to eligible historic resources could remain significant and unavoidable, similar to the proposed Project. However, because there would be less development associated with this Alternative, this Alternative would result in less impacts on existing or future eligible historic resources.

Construction activities associated with this Alternative would occur for fewer development than the proposed project; however, could still unearth previously unknown and unrecorded archaeological resources and potential paleontological resources that could be located in the subsurface older Quaternary deposits that are known to contain vertebrate fossils. The implementation of the programmatic mitigation measures identified for the proposed Project would reduce potential archaeological and paleontological impacts associated with Alternative 3 to less than significant, but would result in less impacts than the proposed project.

## Energy

Alternative 3 would reduce housing and employment-generating land uses and focus development to the Slauson TOD area which would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands. Compliance with existing regulations and building codes, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities under Alternative 3 would be energy efficient and thus would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy nor would Alternative 3 conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant, similar to the proposed project.

## Geology and Soils

Implementation of development in accordance with Alternative 3 would expose people and structures to strong seismic ground shaking. However, similar to the proposed Project, conformance with the CBC would reduce impacts to strong seismic ground shaking to the maximum extent possible under currently accepted engineering practices. Therefore, similar to the proposed Project, this Alternative would result in less than significant impacts related to exposing people or structures to strong seismic ground shaking. Construction and operational activities associated with this Alternative could result in soil erosion or loss of top soil; however, compliance with the Construction General Permit, MS4 Permit, and the County's LID Standards would reduce soil erosion and loss of topsoil during construction and operational activities to less than significant similar to the proposed Project. Development in the project area could also be exposed to geologic hazards; however, compliance with the CBC, Los Angeles County ordinances, and the Los Angeles County building code requirements would reduce potential hazards such as unstable soils,

liquefaction, lateral spreading, settlement, subsidence, and collapse to less than significant similar to the proposed Project.

### Greenhouse Gases

Alternative 3 would contribute to global climate change through direct and indirect emissions of GHG from construction and operation of the land uses within the FFTOD Specific Plan Area. Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the proposed project would result in exhaust-related GHG emissions and day-to-day activities associated with operation of the project would generate emissions from a variety of sources. This Alternative would result in fewer residential units and nonresidential square footage compared to the proposed project. The proposed project would exceed the local service population efficiency 2035 target and would result in a cumulative contribution to the long-term GHG emissions in the state. However, implementation of programmatic mitigation measures would reduce impacts to a less than significant level. Therefore, GHG emissions that would result from Alternative 3 would be less than significant with mitigation but would be less than the implementation of the proposed project.

Similar to the proposed Project, this Alternative would not exceed the 2020 GHG threshold which would achieve the AB 32 GHG reduction goals. In addition, this Alternative would be consistent with the CARB Scoping Plan and could be consistent with the SCAG SCS GHG emissions reduction policies. Therefore, similar to the proposed Project, this Alternative would result in less than significant impacts related to compliance with AB 32, CARB Scoping Plan, and the SCAG SCS GHG emissions reduction policies.

### Hazards and Hazardous Materials

Development in accordance with Alternative 3 would involve demolition and construction of new buildings that could include the use of substances such as paints, sealants, solvents, adhesives, cleaners, and diesel fuel similar to the proposed project. There is potential for these materials to spill or to create hazardous conditions. However, the Alternative would be required to comply with existing regulations, including those set forth by Cal/OSHA, LACoFD, USDOT, and Caltrans. Compliance with existing regulations would ensure that construction and operation activities of future development projects related to implementation under this Alternative would result in less than significant impacts related to posing substantial hazards to the public or the environment, similar to the proposed project.

Because of the age of buildings within the FFTOD Specific Plan Area and because the area has land uses that could generate a variety of potential sources of contamination, a variety of potential sources of contamination exists. Implementation of development in accordance with this Alternative could expose unknown soil contamination, disturb or uncover unidentified USTs, or expose or disturb asbestos containing ACMs and LBP during construction activities, similar to the proposed project. Implementation of the project's programmatic mitigation would reduce potential impacts related to accident conditions involving the release of hazardous materials into the environment to less than significant, similar to the proposed project.

Development in accordance with this Alternative would result in usage and storage of hazardous materials onsite and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions and the proposed project, which could emit hazardous

emissions or handle hazardous materials within one-quarter mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur, and impacts would be less than significant similar to the proposed project.

Redevelopment of individual properties within the FFTOD Specific Plan Area under this Alternative could have unknown recognized environmental conditions related to soils, groundwater, and vapors/gases, and could be located on a hazardous materials site, similar to the proposed project. With the implementation of the project mitigation measures, potential impacts on related to creating a significant hazard to the public or the environment would be reduced, similar to the proposed project.

Similar to the proposed project, Alternative 3 would result in construction traffic that could temporarily impede emergency access to and within the FFTOD Specific Plan Area. However, implementation of Alternative 3 is not anticipated to include any roadway changes and improvements that would result in inadequate emergency access, and impacts would be less than significant, similar to the proposed project.

### Hydrology and Water Quality

Development under Alternative 3 would include demolition and grading activities that could expose and loosen sediment and building materials that could mix with storm water and urban runoff. Because each individual project would be required to comply with the NPDES and implement a SWPPP if the project disturbs more than one acre, the potential for pollutants to substantially degrade downstream surface water quality would be less than significant. Projects disturbing less than an acre of ground surface during construction would not be required to prepare a SWPPP, but would be required to implement the minimum BMPs required by the Los Angeles County MS4 Permit to prevent water quality degradation and therefore, impacts would be less than significant. Construction impacts related to water quality standards or waste discharge requirements from implementation of the Alternative would be less than significant, similar to the proposed project.

Operational activities associated with this Alternative would be required to meet MS4 Permit requirements through compliance with the County LID Standards Manual. Compliance with the MS4 Permit regulations would minimize pollutants being transported offsite into downstream receiving waters, and projects implemented in accordance with this Alternative would not violate water quality standards or waste discharge requirements, similar to the proposed project.

Similar to the proposed project, this Alternative includes infill and redevelopment and would increase population; thereby increase demand on water supplies. Because the water purveyors that serve the FFTOD Specific Plan Area have pumping rights to obtain their groundwater from the Central Groundwater Basin, compliance with the judgment that set pumping rights in the Basin would eliminate the potential for the water agencies to substantially impact groundwater supplies. Therefore, similar to the proposed project, the implementation of this Alternative would result in less than significant impacts on the Central Groundwater Basin from groundwater use. The FFTOD Specific Plan Area does not have much groundwater recharge potential, and this Alternative would not include excavation activities that would reach the existing groundwater level

of approximately 160 to 200 feet below ground surface. Therefore, this Alternative would result in less than significant impacts to the existing groundwater levels similar to the proposed project.

Construction and operational activities associated with this Alternative would result in the potential for erosion and siltation impacts. However, construction activities would be required to implement BMPs required by the Construction General Permit, MS4 Permit regulations, and County Pollution Control Requirements for Construction Activities. Operational activities would be required to implement the Los Angeles County LID Standards Manual. With compliance with these regulations, the implementation of development in accordance with this Alternative would result in a less than significant erosion and siltation impact during construction and operational activities, similar to the proposed project.

Development in accordance with this Alternative would result in the generation of little to no increase in runoff to the existing drainage system because the majority of the site is developed and approximately 80 to 90 percent of the site is impervious. Although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff. Implementation of the project's programmatic mitigation would be required. Therefore, similar to the proposed project, this Alternative would result in less than significant impacts on existing and planned storm drains. Furthermore, as stated above, this Alternative's compliance with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the Los Angeles County LID Standards Manual would result in less than significant impacts related to the creation of polluted runoff, similar to the proposed project.

Development in accordance with this Alternative would be required to comply with the local water management plan, and therefore, would result in less than significant impacts related to conflict with a water quality control plan or sustainable groundwater management plan, similar to the proposed project.

### Land Use and Planning

Under this Alternative, the project area would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. Development in accordance with this Alternative includes transit-oriented development that provides for cohesive development throughout the project area similar to the proposed project. This alternative would implement the pedestrian and bicycle circulation patterns identified in the proposed Specific Plan to improve access to the three LA Metro A (Blue) stations. In addition, this alternative would implement SCAG policies that encourage greater densities in areas with TOD opportunities and less dependence on the automobile. This alternative would, however, not be consistent with the General Plan land uses similar to the proposed project. Overall, this Alternative would result in less than significant impacts related to land use policies similar to the proposed project. Because the proposed Specific Plan would implement the County's plans and planning concepts of implementing a TOD in the project area, this Alternative, similar to the proposed project, would result in less than significant environmental impacts related to consistency with establish development regulations.

### Noise

This Alternative would result in less development compared to the proposed project. The land uses that would be implemented under this Alternative would be similar to those that would be implemented with the proposed project. These land uses include residential, mixed-use, and commercial uses. Because this Alternative would result in less residential units and nonresidential square feet compared to the proposed project, this Alternative would result in less construction and operational noise levels. This alternative would exceed noise standards and potentially expose sensitive uses to significant ground-borne vibrations; however, this alternative's significant noise and vibration impacts would be less compared to the proposed project and would be reduced to less than significant with the implementation of the project's programmatic mitigation measures.

### Population and Housing

This Alternative would develop 2,684 fewer residential units and 327,859 fewer square feet of nonresidential space than buildout of the proposed FFTOD Specific Plan. The decrease in population that would be generated by this Alternative would be within the SCAG growth forecasts for the FFTOD Specific Plan area. The majority of jobs in the FFTOD Specific Plan area created under this Alternative would be skilled or managerial, and a majority of these jobs are expected to be filled by persons outside of the project area similar to the proposed project. Jobs are anticipated to be filled by people within Los Angeles County due to the accessibility to the three Metro Stations and multiple freeways, and the larger available labor force within Los Angeles County. Therefore, the implementation of this Alternative would not substantially increase residential and employment population growth, and therefore, impacts would be less than significant similar to the proposed project.

### Public Services

This Alternative would develop 2,684 fewer residential units and 327,859 fewer square feet of nonresidential space than buildout of the proposed FFTOD Specific Plan. Because the proposed project which has more development compared to this Alternative and the County fire stations serving the project area could increase staffing and equipment required for buildout of the proposed project by utilizing the existing fire stations, the development in accordance with this Alternative would also be accommodated by the existing fire stations without altering the existing facilities. Therefore, physical impacts to the environment related to the development of or expansion of fire department facilities would not occur.

Development of this Alternative would increase the need for additional officers to respond to additional calls for sheriff services. The increase in additional officers would be less than required for the proposed project. Because the proposed project's need for additional officers could be accommodated at existing Sheriff Department facilities, the demand for additional officers under this Alternative would not require the alteration of existing sheriff facilities. Therefore, physical impacts to the environment related to the development of or expansion of sheriff department facilities would not occur.

This Alternative would increase the number of students in the project area; however, because the proposed project would result in a less than significant impact on school facilities, this Alternative would also result in less than significant impacts to school facilities. Implementation of this

Alternative would increase the population in the project area and thereby increase a demand for parks and recreation, libraries, and other public facilities. Because the proposed project would generate more population compared to this Alternative and that the proposed project would not result in the need for new or altered parks and recreation, library, and other public facilities, this alternative would also not result in the need for new or altered facilities. Therefore, the implementation of this Alternative would result in no impacts caused by construction impacts associated with new or altered parks and recreation, library, and other public facilities.

### Recreation

Under this Alternative, 2,684 fewer units would be implemented, resulting in a decreased population of 9,170 people, compared to the proposed project. This decreased population would also result in a decreased demand for and use of recreational facilities compared to the proposed project. The FFTOD Specific Plan Area is almost entirely built out with urban uses, and there is very little vacant unincorporated land that could be developed as parkland to serve the Florence-Firestone community. Thus, it is expected that residential developments would likely be required to pay in-lieu fees rather than dedicate parkland. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of this Alternative. Therefore, similar to the proposed project, this Alternative would result in less than significant impacts related to the need to construct new or physically alter recreational facilities.

Similar to the proposed project, there is no specific zone pertaining to park or open space uses under this Alternative. Buildout of this Alternative would include pedestrian and bicycle infrastructure for mobility improvements, similar to the proposed project, and would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under this Alternative. Similar to the proposed project, this Alternative would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and the impact would be less than significant.

The implementation of this Alternative would result in less development and residential population compared to the proposed project, resulting in decreased demand for parks and recreational facilities. Similar to the proposed project, this Alternative would not require new or altered parks and recreation facilities. Therefore, the implementation of this Alternative would result in less than significant impacts caused by construction impacts associated with new or altered parks and recreational facilities.

### Transportation

Buildout of Alternative 3 would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites resulting in in 2,684 fewer residential units and a decrease in nonresidential uses by 327,859 square feet. This Alternative would take into account the TOD-nature of the proposed project and would not conflict with the goal, policies, and programs addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths which include the Connect SoCal (the SCAG RTP/SCS), the Florence-Firestone Community Plan, the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County.

Additionally, this alternative would implement a number of beneficial elements that would occur under the proposed project, including enhancements to the Specific Plan area's mobility and streetscape and complete streets network. The FFTOD Specific Plan includes a number of goals and policies and development standards that would enhance the project area's transportation system for vehicles, pedestrians, bicyclists, and transit users that Alternative 3 would also address. Alternative 3 would have a similar total daily VMT per service population as the proposed project. Additionally, Alternative 3 would not introduce new design hazards or incompatible uses at intersections or along roadway segments or result in inadequate emergency access. Thus, overall transportation and traffic impacts would be similar to the proposed project and result in less than significant impacts.

### Tribal Cultural Resources

Construction activities associated with this Alternative could unearth previously unknown and unrecorded archaeological and tribal cultural resources similar to the proposed project. The implementation of the programmatic mitigation measures identified for the proposed project would reduce potential tribal cultural impacts associated with this alternative to less than significant similar to the proposed project.

### Utilities and Service Systems

Buildout of the Alternative 3 would result in 2,684 fewer residential units and a decrease of 327,859 square feet of nonresidential development. The decrease in residential density and nonresidential development would result in decreased demand for potential wastewater and water usage including potable water and fire prevention demand, electricity, natural gas, telecommunications, and solid waste services. Additionally, this Alternative would generate little increase in runoff to the existing drainage system because the area is completely developed, and projects would be required to incorporate LID practices. With the implementation of the programmatic mitigation measures identified for the proposed project, impacts to utilities and service systems associated with this Alternative would be less than significant, and would be less than the proposed project.

### Conclusion

Potential impacts associated with the implementation of development under Alternative 3 are compared to the potential impacts of development in accordance with the proposed FFTOD Specific Plan. Alternative 3 would reduce impacts to air quality, cultural resources, greenhouse gases, noise, public services, recreation, and utilities and service systems. Alternative 3 would not have any impacts greater than the proposed project. Impacts to aesthetics, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain but be reduced compared to the proposed project.

The implementation of this Alternative would result in less environmental impacts compared to the proposed Project. Alternative 3 would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. This Alternative would meet most of the objectives of providing a transit

oriented development in the FFTOD Specific Plan Area and providing an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements.

## 4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As required by CEQA Guideline Section 15126.6, one of the alternatives must be identified as an Environmentally Superior Alternative. The Environmentally Superior Alternative is the one that would result in the fewest or least significant impacts. If the Environmentally Superior Alternative is the No Project Alternative, then an Environmentally Superior Alternative must be selected from the remaining alternatives.

Alternative 3 Slauson TOD Focused would result in less environmental effects compared to the alternatives and the proposed project. While this alternative would lessen the project's environmental impacts in areas such as air quality, cultural resources, greenhouse gases, noise, etc., it would not eliminate any of the significant unavoidable impacts of the proposed project. Because the impacts would be incrementally reduced as compared to the proposed project, Alternative 3 Slauson TOD Focused would be the environmentally superior alternative. This alternative would meet most of the objectives of providing a transit-oriented development in the project area.

# 5.0 OTHER CEQA CONSIDERATIONS

## 5.1 ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT

As required by Section 15128 of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must contain a brief discussion stating the reasons why various possible significant effects of a project were determined not significant and therefore not discussed in detail in the EIR. In accordance with the CEQA Guidelines, the environmental issue areas where impacts were found to not be significant are described in this section. This section addresses the CEQA Guidelines Appendix G and Los Angeles County Environmental Checklist Form questions for each of the environmental topic areas where the proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) would result in either a less-than-significant impact or no impact. Most of the discussions are the same as those provided in the Notice of Preparation/Initial Study that was distributed for public review on March 15, 2021 (DRP 2021). There are a few discussions that have been modified to substantiate the findings.

### 5.1.1 Aesthetics

**The FFTOD Specific Plan would not have a substantial adverse effect on a scenic vista.**

Scenic vistas include views of scenic resources, such as designated scenic highways and corridors (or routes), hillsides, viewsheds and ridgelines, or other unusual scenic landforms, from any given location. Florence-Firestone is an urbanized community approximately 6 miles south of downtown Los Angeles. Typical views in the FFTOD Specific Plan Area consist of urban development and associated roadways and landscaping. Implementation of the FFTOD Specific Plan would result in redevelopment and infill development of residential, mixed-use, and industrial buildings with maximum heights ranging from 36 to 72 feet. There are no designated scenic highways, significant ridgelines, or other identified scenic resources in the FFTOD Specific Plan Area. The closest scenic highway to the FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. The nearest significant ridgeline to the FFTOD Specific Plan Area is the Santa Monica Mountains, approximately 10 miles north. As a result, impacts to scenic vistas related to implementation of the FFTOD Specific Plan would be less than significant.

**The FFTOD Specific Plan would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail.**

According to the Trails Map by the Los Angeles County Department of Parks and Recreation, no Los Angeles County trails are in the FFTOD Specific Plan Area. The closest riding, hiking, or multi-use trail is the Rio Hondo River Trail, approximately 5 miles east of the FFTOD Specific Plan Area. Therefore, the project would not be visible or obstruct views from a regional trail, and no impact would occur.

**The FFTOD Specific Plan would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.**

Based on a review of the California Department of Transportation Scenic Highways Program, no state scenic highways are in the FFTOD Specific Plan Area. The closest scenic highway to the

FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. Therefore, the FFTOD Specific Plan Area is not visible from this highway, and the project would not result in impacts to scenic resources within view of a state scenic highway. The project would not damage scenic resources and no impact would occur.

## 5.1.2 Agricultural and Forestry Resources

**The FFTOD Specific Plan would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.**

According to the California Important Farmland Finder maintained by the California Department of Conservation, the majority of the FFTOD Specific Plan Area is designated as Urban and Built-Up Land, which indicates that the land is used for residential, industrial, commercial, and other developed purposes. There is an area of Unique Farmland, defined as farmland of lesser quality soils used for the production of the state's leading agricultural crops, at the southern boundary of the FFTOD Specific Plan Area west of Compton Avenue and south of 91st Street. The FFTOD Specific Plan would include zone changes for existing residential parcels adjacent to this area of Unique Farmland. However, the FFTOD Specific Plan would not convert the Unique Farmland to a nonagricultural use. Therefore, the impact would be less than significant.

**The FFTOD Specific Plan would not conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.**

The Williamson Act enables local governments to enter contracts with private landowners to restrict specific parcels of land to agricultural or related open space use in exchange for reduced property tax assessments for the landowners. There are no existing Williamson Act contracts in this part of Los Angeles County, and there are no designated agricultural resource areas in the FFTOD Specific Plan Area. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

**The FFTOD Specific Plan would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 [g]), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104[g]).**

The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not in an area zoned for forest land, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. Therefore, implementation of the project would not conflict with or cause rezoning of forest land or timberland, and no impact would occur.

**The FFTOD Specific Plan would not result in the loss of forest land or conversion of forest land to nonforest use.**

The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not zoned for forest land, nor does it contain any forests. Therefore, implementation of the

project would not result in the loss of forest land or conversion of forest land to nonforest use, and no impact would occur.

**The FFTOD Specific Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use.**

The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses. As described above, Unique Farmland exists in the FFTOD Specific Plan Area. Although the FFTOD Specific Plan includes zone changes for existing residential parcels adjacent to this farmland, it does not propose converting the Unique Farmland to nonagricultural use. In addition, the changes associated with the FFTOD Specific Plan would not be expected to result in future conversion of this farmland to nonagricultural use, because the farmland would remain in the same context of agricultural activities in an electrical transmission right-of-way that is surrounded by urban development. Therefore, the impact would be less than significant.

## 5.1.3 Biological Resources

**The FFTOD Specific Plan would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).**

The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and lacks natural, vegetated areas (such as creeks or channels) that could support sensitive natural communities or native habitat for sensitive species. The proposed FFTOD Specific Plan provides for infill development in an already highly disturbed urban environment. Therefore, implementation of the FFTOD Specific Plan would not result in any direct impacts to special-status species identified as a candidate, sensitive, or special-status species. Any occurrence of a sensitive species in the FFTOD Specific Plan Area is expected to be an incidental occurrence, such as during foraging. It is anticipated that some trees would likely be removed to accommodate construction of development projects, which has the potential to impact nesting birds if future development occurs during the nesting season.

The Migratory Bird Treaty Act (MBTA) of 1918 prohibits the take (i.e., killing, capturing, selling, trading, or transport) of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA (United States Code Title 16, Chapter 7, Subchapter II, Sections 703-712). Compliance with the MBTA would generally include avoiding construction activities during the nesting season, February 15 through September 1, or if construction activities are to be undertaken during the nesting season, by conducting pre-construction nesting bird surveys and, if needed, providing a qualified biologist to monitor active nests to ensure construction does not affect species protected under the MBTA. Nesting birds are also protected under the California Fish and Game Code (Section 3505 et seq.). Section 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird, with specified exceptions. By law, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with the MBTA and California Fish and Game Code to protect migratory and nesting birds. As such, impacts to nesting birds would be less than significant.

**The FFTOD Specific Plan would not have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, nonjurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.**

According to the National Wetlands Inventory managed by the USFWS, no riparian habitat or nonjurisdictional wetlands are in the FFTOD Specific Plan Area. In addition, as described above, the FFTOD Specific Plan Area lacks natural, vegetated areas that could support sensitive natural communities or native habitat for sensitive species. The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and the project would not adversely affect any sensitive natural communities. No impact would occur.

**The FFTOD Specific Plan would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.**

As described above, according to the National Wetlands Inventory, there are no state or federally protected wetlands in the FFTOD Specific Plan Area, which is heavily urbanized. The closest mapped wetland to the FFTOD Specific Plan Area is Compton Creek, approximately 1.3 miles south of the FFTOD Specific Plan Area. Therefore, the project would have no impact on wetlands.

**The FFTOD Specific Plan would not 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.**

The FFTOD Specific Plan Area is heavily urbanized and does not present suitable habitat to support the movement of native or migratory fish. Existing trees and vegetation in the FFTOD Specific Plan Area may be used as habitat by migratory birds. However, as described above, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with state and federal regulations that protect migratory wildlife, including the MBTA and California Fish and Game Code. Therefore, impacts would be less than significant.

**The FFTOD Specific Plan would not convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).**

According to the Los Angeles County Department of Regional Planning's (DRP's) Distribution of Oak Species in Los Angeles County Map, there is no occurrence of oak woodlands or other unique native woodlands in or near the FFTOD Specific Plan Area, as the area is developed with urban land uses. Therefore, no impact would occur to oak woodlands or native woodlands.

**The FFTOD Specific Plan would not conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (**Los Angeles **County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (**Los Angeles **County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (**Los Angeles **County Code, Title 22, Ch. 102), Specific Plans (**Los Angeles **County Code, Title 22, Ch. 22.46), Community Standards Districts (**Los Angeles **County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (**Los Angeles **County General Plan, Figure 9.3).**

The only applicable local policy or ordinance protecting biological resources for the FFTOD Specific Plan Area is the Los Angeles County Oak Tree Ordinance (County Code of Ordinances Sections 22.56.2050 et seq.), which prohibits anyone from damaging or removing oak trees without a permit from DRP. Although no occurrence of oak woodlands or other unique native woodlands occur in or near the FFTOD Specific Plan Area as described above, existing landscaping in the FFTOD Specific Plan Area may include oak trees. However, future proposed development under the FFTOD Specific Plan would be required to adhere to the Oak Tree Ordinance. The Oak Tree Ordinance requires permit applicants to submit a site plan and an oak tree report. The site plan should show the locations and dimensions of existing land uses; proposed features on the site; and the location of all oak trees subject to the ordinance proposed to be removed and/or relocated, or oak trees within 200 feet of proposed construction, grading, landfill, or other activity. The oak tree report should be prepared, by an individual with expertise acceptable to the director and Los Angeles County forester and fire warden, of each tree shown on the site plan describing the size, structure, and health of each tree; and identifying trees that may be classified as heritage trees (i.e., any oak tree measuring 36 inches or more in diameter, measured 4.5 feet above the natural grade, or any other oak tree having significant historical or cultural importance to the community). As a result, the project would not conflict with any local plans or policies protecting biological resources, and impacts would be less than significant.

**The FFTOD Specific Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan.**

According to the Habitat Conservation Database managed by the USFWS, the FFTOD Specific Plan Area is not in any adopted Habitat Conservation Plan area. In addition, based on the California Natural Community Conservation Plans Map created by CDFW, the FFTOD Specific Plan Area is not in any Natural Community Conservation Plan area. No impact would occur.

## 5.1.4 Geology and Soils

**The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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 active fault trace.**

The Los Angeles Basin contains both active and potentially active faults and is considered a region of high seismic activity. The California Earthquake Hazards Zone Application Map issued by the California Geological Survey shows no active faults or Alquist-Priolo Earthquake Fault Zones in the FFTOD Specific Plan Area. The closest known fault is the Newport-Inglewood-Rose Canyon

Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area and the Upper Elysian Park Fault approximately 5.2 miles north of the FFTOD Specific Plan Area. Ground rupture is considered more likely along active faults. Due to the distance between the FFTOD Specific Plan Area and the nearest active fault, future development pursuant to implementation of the FFTOD Specific Plan is unlikely to experience ground rupture. The impact would be less than significant.

**The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.**

Buildout of the FFTOD Specific Plan would increase the numbers of residential units, nonresidential structures, residents, and workers in the FFTOD Specific Plan Area. As discussed above, the closest active faults to the FFTOD Specific Plan Area are the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area and the Upper Elysian Park Fault approximately 5.2 miles north of the FFTOD Specific Plan Area. Even though future development pursuant to implementation of the FFTOD Specific Plan would not likely experience ground rupture, strong seismic ground shaking would likely occur within the lifetime of the FFTOD Specific Plan. Although strong seismic shaking is a risk throughout Southern California, the FFTOD Specific Plan Area is not at greater risk of seismic activity or impacts than other areas. Additionally, the California Building Code regulates development to reduce hazards from earthquakes and other geologic hazards. The California Building Code contains building design and construction requirements that are intended to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. Additionally, future development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the provisions of the California Building Code, which are imposed on development projects by Los Angeles County during the building plan check and development review process. Compliance with the requirements of the California Building Code would ensure that impacts related to the hazards associated with strong seismic ground shaking would be less than significant.

**The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.**

The FFTOD Specific Plan Area has a flat topography. In addition, according to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is not in or near a landslide zone. Therefore, no impact would occur.

**The FFTOD Specific Plan would not have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater.**

The FFTOD Specific Plan Area is served by a public sanitary sewer system. Future developments pursuant to implementation of the FFTOD Specific Plan would include connections to sanitary sewers and would not use on-site wastewater treatment systems. No impact would occur.

**The FFTOD Specific Plan would not Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104).**

The FFTOD Specific Plan Area has a flat topography and is not subject to the Hillside Management Area Ordinance. No impact would occur.

## 5.1.5 Hazards and Hazardous Materials

**The FFTOD Specific Plan would not be in 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. The project would not result in a safety hazard or excessive noise for people residing or working in the project area.**

According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or within 2 miles of a public or public use airport. The nearest public use airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the Florence-Firestone Community Plan (FFCP) area and no impact would occur.

**The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in a high fire hazard area with inadequate access.**

According to the Fire Hazard Severity Zones Map prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the FFTOD Specific Plan Area is not in or near a Very High Fire Hazard Severity Zone. Therefore, there would be no impact to people or structures in a high fire hazard area with inadequate access.

**The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in an area with inadequate water and pressure to meet fire flow standards.**

As described above, the FFTOD Specific Plan Area is not in a Very High Fire Hazard Severity Zone. Furthermore, the Florence-Firestone community is served by Fire Station 16 at 8010 Compton Avenue. The Los Angeles County Fire Department requires adequate water and pressure to service an area, and adequate water and pressure to meet fire flow standards would be continued with buildout of the FFTOD Specific Plan. Therefore, the impact would be less than significant.

**The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the Project is not in proximity to land uses that have the potential for dangerous fire hazard.**

The FFTOD Specific Plan Area is presently heavily urbanized with industrial and commercial land uses that inherently have some fire hazard potential. However, these existing uses primarily consist of retail store, shopping center, and auto service commercial uses with nearby residential uses that are typical of an urban setting and would not be considered a dangerous fire hazard. Additionally, the proposed FFTOD Specific Plan zones would consider uses suitable for employment near residential areas as well as the creation of transitions between industrial uses that would serve to limit exposure of people to certain land uses. Further, as previously described, the FFTOD Specific Plan Area is not in a Very High Fire Hazard Severity Zone. Therefore, a less than significant impact would occur to people or structures in proximity to land uses that have the potential for fire hazard.

**The FFTOD would not propose a use that would constitute a potentially dangerous fire hazard.**

The FFTOD Specific Plan would address land use and zoning changes and provide recommendations for mobility improvements that support housing density and employment in proximity to the LA Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. It would include light industrial and commercial land uses that may use or manufacture products/materials that could present some fire hazard. However, the FFTOD Specific Plan Area is already heavily urbanized with industrial and commercial land uses that also inherently have some fire hazard potential. The majority of the existing industrial uses in the FFTOD Specific Plan Area are light manufacturing, with a small amount of heavy manufacturing, with industrial uses primarily clustered along industrial corridors with auto related uses. The proposed Industrial Flex zone would maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for employment near residential areas. The Mixed-Use Zoning Categories (MU-1, MU-2, MU-3, and MU-T) would create an employment-focused, high-intensity mixed-use transit district that allows for the creation of transitions between industrial uses. The Industrial Flex zone would allow for the creation of transitions between employment uses and residential to encourage less noxious uses and focus on light industrial, neighborhood-serving commercial and office uses. Therefore, future development in these zones would not constitute a potentially dangerous fire hazard or increase the potential for dangerous fire hazards as they would consist of typical urban land uses, similar to existing conditions. The impact would be less than significant.

## 5.1.6 Hydrology and Water Quality

**The FFTOD Specific Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows which would expose existing housing or other insurable structures in a federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding.**

The Federal Emergency Management Agency (FEMA) Flood Map Service Center, managed by the Department of Homeland Security, indicates that the FFTOD Specific Plan Area is in an area of minimal flood hazard. In addition, DRP's GIS-NET Public Map shows no streams or rivers in the FFTOD Specific Plan Area. Therefore, future development pursuant to implementation of the FFTOD Specific Plan would not impede or redirect flood flows and would not expose existing housing to flood hazards. The impact would be less than significant.

**The FFTOD Specific Plan would not otherwise place structures in federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.**

As previously discussed, the FFTOD Specific Plan Area is designated as an area of minimal flood hazard. Future development pursuant to implementation of the FFTOD Specific Plan would not place structures in the federal 100-year flood hazard or Los Angeles County Capital floodplain areas. The impact would be less than significant.

**The FFTOD Specific Plan would not conflict with the Los Angeles County Low Impact Development Ordinance (**Los Angeles **County Code, Title 12, Ch. 12.84).**

The Los Angeles County Low Impact Development (LID) Ordinance incorporates design strategies using naturalistic, on-site Best Management Practices for new development to reduce impacts to stormwater quality and quantity. All designated, nondesignated, street and road construction, and single-family hillside home projects in the Unincorporated Areas of Los Angeles County, including in the Florence-Firestone community, are required to comply with the LID Standards Manual. A comprehensive LID plan and analysis demonstrating compliance with the LID Standards Manual must be submitted for review and approval by the Director of Public Works. Future redevelopment and infill development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the ordinance as applicable. No impact would occur.

**The FFTOD Specific Plan would not use on-site wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).**

The FFTOD Specific Plan Area is served by existing public sanitary sewers. No wastewater treatment systems are proposed in the FFTOD Specific Plan Area. Additionally, the FFTOD Specific Plan Area does not contain geological limitations or surface water such as rivers and lakes. Therefore, no impact related to use of wastewater treatment systems in these areas would occur.

**The FFTOD Specific Plan would not risk release of pollutants due to project inundation In flood hazard, tsunami, or seiche zones.**

As previously discussed, the FFTOD Specific Plan Area is designated as an area of minimal flood hazard. The Los Angeles County Tsunami Inundation Maps created by the California Department of Conservation show that the FFTOD Specific Plan Area is not in a tsunami inundation zone. In addition, the Dam Locations Map created by the Los Angeles County Public Works show no dams or reservoirs in or near the area, indicating that the FFTOD Specific Plan Area is not in a seiche zone. Because the FFTOD Specific Plan Area is not in any of the aforementioned zones, no impact related to the risk of release of pollutants due to inundation would occur.

## 5.1.7 Land Use and Planning

**The FFTOD Specific Plan would not physically divide an established community.**

The FFTOD Specific Plan Area is heavily urbanized with residential, commercial, and industrial uses. Implementation of the FFTOD Specific Plan would include land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the LA Metro A Line Station area (i.e., Slauson, Florence, and Firestone Stations). These improvements would make it easier for bicyclists and pedestrians to access these stations and enhance commercial development focused on serving the local community. Redevelopment and infill development of parcels in the FFTOD Specific Plan Area would result in additional housing units and promote multi-modal connectivity and increase access to transit within the community. Therefore, implementation of the project would not physically divide an established community. A less than significant impact would occur.

**The FFTOD Specific Plan would not conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas.**

DRP defines Hillside Management Areas (HMAs) as areas with 25 percent or greater natural slopes, and Significant Ecological Areas (SEAs) as areas with irreplaceable biological resources. According to DRP's GIS-NET Public database, no HMAs or SEAs are in or near the FFTOD Specific Plan Area. Therefore, the project would not conflict with the goals and policies of the General Plan related to HMAs or SEAs and no impact would occur.

## 5.1.8 Mineral Resources

**The FFTOD Specific Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.**

According to the Generalized Mineral Land Classification Map of Los Angeles County – South Half issued by the California Geological Survey, the majority of the FFTOD Specific Plan Area is designated as Mineral Resource Zone (MRZ) 1, which indicates that no significant mineral deposits are present, or that there is little likelihood for their presence. The northern portion of the FFTOD Specific Plan Area, from Slauson Avenue until approximately E 62nd Street, is designated MRZ-2, which indicates that the area contains significant mineral deposits or high likelihood exists for their presence. However, that portion of the FFTOD Specific Plan Area is currently heavily urbanized with residential and industrial uses. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that are incompatible with mining. In addition, no active mines are in or near the FFTOD Specific Plan Area. Therefore, a less than significant impact would occur related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

**The FFTOD Specific Plan would not 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 General Plan does not specify areas of significant availability of a locally important mineral resource recovery site in the FFTOD Specific Plan Area. The FFCP also does not specify such mineral resource recovery areas. Although a portion of the FFTOD Specific Plan Area is designated as MRZ-2, as described above, the land is already built out with urban land uses incompatible with mining. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that would also be incompatible with mining. Therefore, the project would not result in the substantial 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 impact would be less than significant.

### 5.1.9 Noise

**The FFTOD Specific Plan would not be in the vicinity of a private airstrip or 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. The project would not expose people residing or working in the project area to excessive noise levels.**

According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or a private airstrip, or within 2 miles of a public airport or public use airport. The closest airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. The project would not expose people residing or working in the FFTOD Specific Plan Area to excessive noise levels from aircraft. No impact would occur.

### 5.1.10 Recreation

**The FFTOD Specific Plan would not interfere with regional trail connectivity.**

According to the Los Angeles County Department of Parks and Recreation's Trails Map, there are no Los Angeles County trails in the FFTOD Specific Plan Area. The closest riding, hiking, or multi-use trail is the Rio Hondo River Trail, which is approximately 5 miles east of the FFTOD Specific Plan Area. In addition, the FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses with little open space. The project would not interfere with regional open space connectivity, and no impacts would occur.

### 5.1.11 Wildfire

**The FFTOD Specific Plan would not be located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project would not substantially impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors; 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; 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; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.**

According to the California Fire Hazard Severity Zone Map prepared by CAL FIRE, the FFTOD Specific Plan Area is not in or near a Very High Fire Hazard Severity Zone in a Local Responsibility Area or a State Responsibility Area. Therefore, no impact related to high fire hazard severity zones would occur.

# 5.2 GROWTH INDUCEMENT

CEQA Guidelines Section 15126.2(d) requires that an EIR evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is definedby CEQA Guidelines Section 15126.2 (d) as follows:

> the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth…Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also…the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

There are two types of growth-inducing impacts a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project features that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community that directly induces population growth or the construction of additional developments in the same area of the proposed project, thereby triggering related growth-associated impacts.

Included in this analysis are projects that would remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant that could allow more construction in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they trigger. In contrast, projects that physically remove obstacles to growth, projects that indirectly induce growth, are those that may provide a catalyst for future unrelated development in an area (such as a new residential community that requires additional commercial uses to support residents).

A project can have a direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for instance, involved the construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. For example, a project providing an increased water supply in an area where water service historically limited growth could be considered growth inducing.

The CEQA Guidelines explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community impacts such as degradation of air and water quality,

degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Typically, the growth-inducing potential would be considered significant if it stimulates human population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Significant growth potential could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies.

As described below, this analysis evaluates whether the proposed project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

## 5.2.1 Direct and Indirect Growth-Inducing Impacts

Total buildout of the FFTOD Specific Plan is projected to result in 25,532 total dwelling units, a population of 100,423 (a 3.9 population to housing ratio), and total employment of 11,408 people in the FFTOD Specific Plan Area in 2035; this translates to a net increase of 12,110 new dwelling units, 42,518 more people, and 2,734 new jobs over existing conditions. A buildout comparison of the socioeconomic data associated with the land use changes proposed in the FFTOD Specific Plan to the Southern California Association of Governments' (SCAG's) socioeconomic data 2040 Model (interpolated to the 2035 buildout year of the FFTOD Specific Plan) results in higher densities and more growth than assumed in SCAG's Model (i.e., the FFTOD Specific Plan would substantially increase housing units [approximate 71 percent increase], population [approximate 52 percent increase], and jobs [approximate 19 percent increase]). As such, the population, housing, and employment projections with buildout of the FFTOD Specific Plan are greater than current projections identified by SCAG. This increase in population, housing, and employment projections is considered substantial. However, the FFTOD Specific Plan is consistent with SCAG's Connect SoCal goals for focusing higher-density development in transit-rich areas. The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMT, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal.

The determination of whether the FFTOD Specific Plan would induce growth in the vicinity of the FFTOD Specific Plan Area or in Los Angeles County is based on whether the increase in population and housing in the FFTOD Specific Plan Area would increase the need for additional commercial or public services beyond the existing commercial or public services and the commercial services that would result as part of the project. In addition, a determination of inducement of growth is whether the increase in job growth in the FFTOD Specific Plan Area would increase the need for additional housing beyond the existing housing and the housing proposed as part of the project.

The exceedance of population and housing projection over an approximate 15-year period in the region is considered nominal because the growth in the FFTOD Specific Plan would represent 3 percent of Los Angeles County's incremental population growth and 3 percent of Los Angeles County's incremental residential growth (as shown in Table 3.11-3 of Section 3.11, Population and Housing). Furthermore, the FFTOD Specific Plan focuses on infill development within walking distance of the LA Metro A Line Slauson, Florence, and Firestone stations in an area that

is presently completely built out; as described in Section 3.14, Transportation, the FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population. Therefore, the FFTOD Specific Plan would not induce substantial additional population and housing growth that would result in significant impacts to the environment.

The increase in jobs in the FFTOD Specific Plan Area represents 0.5 percent of the projected job growth in Los Angeles County for 2035. Furthermore, based on an average unemployment rate of 7.1 percent for Florence-Firestone and 5 percent for Los Angeles County (2016), it is reasonable to assume that there will be people living in the county and region available to fill the increase in jobs created in the FFTOD Specific Plan Area without a substantial amount of migration into the region that would require new housing beyond the available housing in the FFTOD Specific Plan Area, Los Angeles County, or region. Therefore, the increase in jobs would not induce additional growth that would result in significant impacts to the environment.

Construction of future development projects that would occur in the FFTOD Specific Plan Area would include need for construction labor during short time periods. Due to the employment patterns of construction workers in Southern California and the market for construction labor, construction workers are not likely to relocate their households to any significant degree as a consequence of the job opportunities presented by the project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on housing:

- There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

Therefore, construction activities associated with the project would not result in population, housing, or job growth that would result in significant impacts to the environment.

As described above, both operational and construction activities associated with implementation of the FFTOD Specific Plan would not induce population, housing, or job growth that would result in impacts to the environment. The FFTOD Specific Plan would not induce substantial unplanned population growth in an area, directly or indirectly. Impacts would be less than significant.

In addition, as previously mentioned, California law requires that cities and counties zone land to encourage and facilitate their fair share of the Regional Housing Needs Assessment (RHNA). Note that the FFTOD Specific Plan provides Los Angeles County with the opportunity to create new affordable units to accommodate the needs of residents. The FFTOD Specific Plan would assist Los Angeles County in implementing the Housing Element and present Housing Element Update of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA. Areas outside of the transit oriented district areas of the FFTOD Specific Plan are considered “stability areas.” Targeted changes in the stability areas are generally limited to addressing Housing Element Update RHNA needs, creating cohesive blocks that connect to the transit oriented district areas or

reconciling designations with adjacent jurisdiction plans. Therefore, the implementation of the proposed Specific Plan would not result in a significant inducement of indirect growth.

## 5.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 21100(b)(2)(B) of CEQA and Section 15126.2(c) of the CEQA Guidelines require that an EIR include a detailed statement setting forth "[a]ny significant effect on the environment that would be irreversible if the project is implemented." (Public Resources Code Section 21100(b(2)(B). "Significant irreversible environmental changes" include the use of nonrenewable natural resources during the initial and continued phases of the project, should this use result in the unavailability of these resources in the future. Primary impacts and, particularly, secondary impacts generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with projects. Irretrievable commitments of these resources are required to be evaluated in an EIR to ensure that such consumption is justified (CEQA Guidelines Section15126.2[c]).

Approval of the proposed project would cause irreversible changes to the environment. Project construction and operation would result in an irretrievable loss of—and irreversible commitment of—natural resources. The FFTOD Specific Plan Area is in an existing urbanized area but would require the commitment of resources such as lumber and steel to construct the infill development. Development projects that would be implemented in accordance with the Specific Plan would involve construction and operation that would use fossil fuels and other natural materials, such as wood and metals. Construction and operation of infill developments would also emit pollution into the air from construction machines and vehicles as well as vehicles traveling to and from each infill development project during operation. These developments would also consume fossil fuels (petroleum and natural gas) and electricity generated by fossil fuels and other nonrenewable resources during operation. As described throughout this EIR, the Specific Plan would implement the TOD Program in such a manner that would reduce vehicle trips, encourage pedestrian and bicycle circulation, and promote public transit use. In addition, development projects that would be implemented by the Specific Plan would be required to comply with federal, state, and local requirements (described in each environmental resource section), such as Title 24 requirements and low impact development requirements that would reduce the irretrievable loss of—and irreversible commitment of—natural resources.

## 5.4 REFERENCES

Los Angeles County Department of Regional Planning (DRP). 2021. Notice of Preparation and Environmental Checklist Form (Initial Study) for the "Florence-Firestone Transit-Oriented District Specific Plan"/Project No. PRJ2020-003127/ Case No. Specific Plan RPPL202009556, Environmental RPPL202000523.

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# 7.0 ACRONYMS AND ABBREVIATIONS

| | |
|---|---|
| °F | Fahrenheit |
| AAQS | Ambient Air Quality Standards |
| AB | Assembly Bill |
| ACM | asbestos-containing material |
| ADA | Americans with Disabilities Act |
| AECOM | AECOM Technical Services, Inc. |
| AMI | adjusted median income |
| APE | Area of Potential Effect |
| AQMD | Air Quality Management District |
| AQMP | Air Quality Monitoring Plan |
| ARB | Air Resources Board |
| ASTM | American Society for Testing and Materials |
| BAAQMD | Bay Area Air Quality Management District |
| BERD | Built Environment Resources Directory |
| BMP | best management practice |
| Btu | British thermal unit |
| CAAQS | California Ambient Air Quality Standards |
| Cal/OHSA | California Division of Occupational Safety and Health |
| California ARB | California Air Resources Board |
| CalGreen | California Green Building Standards Code |
| CalRecycle | California Department of Resources Recycling and Recovery |
| Caltrans | California Department of Transportation |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CAP | Climate Action Plan |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CAT | California Climate Action Team |
| CBC | California Building Code |
| CCCC | California Climate Change Center |
| CCR | California Code of Regulations |
| CDE | California Department of Education |
| CDF | California Department of Finance |
| CDFW | California Department of Fish and Wildlife |
| CEC | California Energy Commission |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CEQA | California Environmental Quality Act |
| CFC | California Fire Code |
| CFCs | chlorofluorocarbons |
| CFR | Code of Federal Regulations |

| | |
|---|---|
| CG | General Commercial |
| CGS | California Geological Survey |
| $CH_4$ | methane |
| CM | Major Commercial |
| CNEL | Community Noise Equivalent Level |
| CNRA | California Natural Resources Agency |
| CO | carbon monoxide |
| $CO_2$ | carbon dioxide |
| CPTED | Crime Prevention Through Environmental Design |
| CPUC | California Public Utilities Commission |
| CRHR | California Register of Historical Resources |
| CSE | countywide siting element |
| CSMD | Consolidated Sewer Maintenance District |
| CUPA | Certified Unified Program Agency |
| CWA | Clean Water Act |
| dB | decibels |
| dBA | A-weighted decibels |
| DDT | dichlorodiphenyltrichloroethane |
| DDW | Division of Drinking Water |
| DOT | Department of Transportation |
| DPM | diesel particulate matter |
| DRP | Los Angeles County Department of Regional Planning |
| DTSC | California Department of Toxic Substances Control |
| du/ac | dwelling units per acre |
| DWR | Department of Water Resources |
| EDD | California Department of Economic Development |
| EIA | Energy Information Administration |
| EIR | Environmental Impact Report |
| EJ | Environmental Justice |
| EPA | Environmental Protection Agency |
| EPCRA | Emergency Planning and Community Right-to-Know Act |
| ESA | Environmental Site Assessment |
| FAR | floor area ratio |
| FEMA | Federal Emergency Management Agency |
| FFCP | Florence-Firestone Community Plan |
| FFCET | Florence-Firestone Community Enhancement Team |
| FFCSD | Florence-Firestone Community Standards District |
| FFTOD | Florence Firestone Transit Oriented District |
| FHWA | Federal Highway Administration |
| g/L | grams per liter |
| GFA | gross floor area |

| | |
|---|---|
| GHG | greenhouse gas |
| gpd | gallons per day |
| GSF | gross square feet |
| GSWC | Golden State Water Company |
| GWP | global warming potential |
| HABS | Historic American Buildings Survey |
| HCFC | hydrochlorofluorocarbons |
| HEPA | High Efficiency Particle Arresting |
| HFC | hydrofluorocarbon |
| HRG | Historic Resources Group |
| HSC | Health and Safety Code |
| HVAC | heating, ventilation, and air conditioning |
| IF | Industrial Flex |
| in/sec | inches per second |
| IPCC | Intergovernmental Panel on Climate Change |
| JWPCP | Joint Water Pollution Control Plant |
| kBtu | thousand British thermal unit |
| KSI | killed or seriously injured |
| LA Metro | Metropolitan Transit Authority |
| LACC | Los Angeles County Code |
| LACFCD | Los Angeles County Flood Control District |
| LACoFD | Los Angeles County Fire Department |
| LADWP | Los Angeles Department of Water and Power |
| LARWQCB | Los Angeles Regional Water Quality Control Board |
| LASD | Los Angeles County Sheriff's Department |
| LAUSD | Los Angeles Unified School District |
| LBP | lead-based paint |
| LCFS | Low Carbon Fuel Standard |
| Leq | energy-equivalent sound level |
| LID | Low Impact Development |
| LST | Localized Significance Threshold |
| LUST | leaking underground storage tank |
| MATES | Multiple Air Toxics Exposure Study |
| MBTA | Migratory Bird Treaty Act |
| MCL | Maximum Contaminant Level |
| MM | mitigation measure |
| MMT | million metric ton |
| MPO | Metropolitan Planning Organization |
| MRZ | Mineral Resource Zone |
| MS4s | municipal separate storm sewer systems |
| MT | metric ton |

| | |
|---|---|
| MU | Mixed-Use |
| MU-T | Mixed-Use Transit |
| MXD | Mixed-Use Development |
| $N_2O$ | nitrous oxide |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NHPA | National Historic Preservation Act |
| NHTSA | National Highway Traffic and Safety Administration |
| NOP | Notice of Preparation |
| NOx | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| NRCS | National Resource Conservation Service |
| NRHP | National Register of Historic Places |
| $O_3$ | ozone |
| OEHHA | Office of Environmental Health Hazard Assessment |
| OEM | Office of Emergency Management |
| OHP | Office of Historic Preservation |
| OPR | Office of Planning and Research |
| OS | Open Space |
| OSHA | Occupational Safety and Health Administration |
| OWTS | On-site Wastewater Treatment Systems |
| PCB | polychlorinated biphenyl |
| PFC | perfluorocarbon |
| PHI | Point of Historical Interest |
| $PM_{10}$ | particulate matter with a diameter of 10 microns or less |
| $PM_{2.5}$ | particulate matter with a diameter of 2.5 microns or less |
| PPV | peak particle velocity |
| PRC | Public Resources Code |
| PVC | polyvinyl chloride |
| RCB | reinforced concrete box |
| RCNM | Roadway Construction Noise Model |
| RCRA | Resource Conservation and Recovery Act |
| RH | Residential High |
| RHNA | Regional Housing Needs Assessment |
| RLM | Residential Low-Medium |
| RM | Residential Medium |
| RMS | root mean square |
| ROG | reactive organic gases |
| RPD | residential planned development |
| RPS | renewable portfolio standard |
| RSS | Residential Slauson Station |

| | |
|---|---|
| RTP | Regional Transportation Plan |
| RWQCB | Regional Water Quality Control Board |
| SAFE | Safer Affordable Fuel Efficient |
| SARA | Superfund Amendment and Reauthorization Act |
| SANDAG | San Diego Association of Governments |
| SB | Senate Bill |
| SCAG | Southern California Association of Governments |
| SCAB | South Coast Air Basin |
| SCAQMD | South Coast Air Quality Management District |
| SCCIC | South Central Coastal Information Center |
| SCE | Southern California Edison |
| SCG | Southern California Gas Company |
| SCS | Sustainable Communities Strategy |
| SED | Southern California Association of Governments Socioeconomic Data |
| $SF_6$ | sulfur hexaflouride |
| SHMA | Seismic Hazard Mapping Act |
| SIP | State Implementation Plan |
| SMD | Los Angeles Department of Public Works Sewer Maintenance Division |
| SOI | Secretary of the Interior |
| SOI Standards | Secretary of the Interior's Professional Qualification Standards |
| SP | service population |
| SRA | Source Receptor Area |
| SRTP | Short-Range Transportation Plan |
| SWPPP | Stormwater Pollution Prevention Plan |
| SWQDv | Stormwater Quality Design Volume |
| SWRCB | State Water Resources Control Board |
| TAC | toxic air contaminant |
| TMDL | Total Maximum Daily Load |
| TOD | Transit Oriented District |
| TRU | transportation refrigeration unit |
| TSSP | traffic signal signalization program |
| TTCP | traditional tribal cultural places |
| U.S. | United States |
| US DOT | U.S. Department of Transportation |
| USC | United States Code |
| USFWS | United States Fish and Wildlife Service |
| USGS | United States Geological Survey |
| UST | underground storage tank |
| UWMP | Urban Water Management Plan |
| VCP | vitrified clay pipe |
| VdB | vibration decibels |

| | |
|---|---|
| VMT | vehicle miles traveled |
| WRD | Water Replenishment District of Southern California |
| VOC | volatile organic compounds |
| ZNE | zero net energy |

# APPENDIX A

# NOTICE OF PREPARATION/INITIAL STUDY

# PUBLIC SCOPING COMMENT LETTERS

Los Angeles County
Department of Regional Planning

*Planning for the Challenges Ahead*

Amy J. Bodek, AICP
Director

**NOTICE OF PREPARATION**
**OF A DRAFT ENVIRONMENTAL IMPACT REPORT**
**AND PUBLIC SCOPING MEETING**

**DATE: March 15, 2021**

**TO:** State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

**SUBJECT:** Notice of Preparation of a Draft Environmental Impact Report in Compliance with Title 14, section 15082(a) of the California Code of Regulations

The Los Angeles County (LA County) is the lead agency pursuant to the California Environmental Quality Act ("CEQA") and intends to prepare an Environmental Impact Report ("EIR") for the proposed Project identified below. LA County has prepared this Notice of Preparation ("NOP") to provide Responsible Agencies and other interested parties with information describing the Project and to identify its potential environmental effects pursuant to State requirements.

**AGENCIES:** LA County requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed Project, in accordance with Title 14, section 15082(b) of the California Code of Regulations. Your agency will need to use the EIR prepared by LA County when considering any permits that your agency must issue, or other approval for the Project.

**ORGANIZATIONS AND INTERESTED PARTIES:** LA County requests your comments and concerns regarding the environmental issues associated with construction and operation of the proposed Project.

**PROJECT & PERMIT(S):** Florence-Firestone Transit Oriented District Specific Plan.

Project No. PRJ2020-003127 / Case No(s). Specific Plan: RPPL2020009556, Environmental: RPPL2020009523.

**PROJECT APPLICANT:** Los Angeles County Department of Regional Planning

**PROJECT LOCATION:** The proposed Florence-Firestone Transit-Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Area encompasses the entire LA County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.6 square miles. The area is bound by the City of Los Angeles to the north, south, and west. The City of Huntington Park, the City of South Gate, and the unincorporated community of Walnut Park are to the east of the community area. The Metro A Line (previously Metro Blue Line), which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone Stations) and operates numerous bus routes in the community. Three freeways (I-110, I-105, I-10) are within a 2.5-mile radius of the community (see the Figure 1).

**PROJECT DESCRIPTION:** The proposed FFTOD Specific Plan will implement the LA County General Plan 2035 (General Plan) TOD Program. TODs are defined in the General Plan as the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, three Metro A Line stations are present: the Slauson, Florence, and Firestone Stations. The goals of the FFTOD Specific Plan are to create transit-accessible housing development; increase job-generating uses and economic activity; develop a safe and attractive transportation network; increase walking, bicycling, and transit ridership; and streamline the environmental review process for future development projects in the community.

The FFTOD Specific Plan would propose new zoning categories, primarily within the 0.5-mile TOD area of the three Metro A Line stations, that include development standards and design guidelines appropriate for meeting the planned density and intensity established by the General Plan Land Use Designations. The FFTOD Specific Plan proposes the following nine new zoning categories: Industrial Flex (IF), Mixed-Use 1 (MU-1), Mixed-Use 2 (MU-2), Mixed-Use 3 (MU-3), Mixed-Use Transit (MU-T), Residential Low-Medium 1 (RLM-1), Residential Low-Medium 2 (RLM-2), Residential Medium (RM) and Residential Slauson Station (RSS). These zoning category names/titles are subject to change to match LA County naming conventions as the FFTOD Specific Plan is further developed. New zoning category standards would also include setback and parking standards to address mobility issues in the community. The Project would also update zoning categories for sites identified for the Regional Housing Needs Assessment (RHNA) by the Housing Element update (HEU).

The FFTOD Specific Plan would establish or widen sidewalks at key locations within the 0.5-mile TOD areas (portions of Slauson Avenue, Compton Avenue, Holmes Avenue, Nadeau Street, and Firestone Boulevard) from the current range of 6 feet to 14 feet to the desired 12 feet to 15 feet and parkways with a minimum of 10 feet. This may be

accomplished through expanding the right-of-way or through private setback conditions that contribute to the sidewalk width; specific strategies will be identified in the FFTOD Specific Plan.

The FFTOD Specific Plan may reduce or alter the number of required parking spaces associated with mixed-use development or within proximity to the Metro transit stations. This may include lower or altered parking requirements for land use categories such as residential, commercial, entertainment, assembly, and dining, and business and professional office. These changes would be aligned with state guidance on transit priority area reductions, and help facilitate the TOD and encourage affordable development for the community.

In addition to establishing new zoning categories, the Project would amend and incorporate the standards of the Florence-Firestone Community Standards District (FFCSD) into the FFTOD Specific Plan. Incorporation of the FFCSD would allow all the land use regulations applicable to the Florence-Firestone community to be provided within a single document for ease of review and implementation.

**POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT:** Based on a preliminary review of the proposed Project consistent with section 15060 of the CEQA Guidelines, LA County has determined that an EIR should be prepared for this proposed Project. In addition, consistent with section 15082 of the CEQA Guidelines, LA County has identified the following probable environmental effects of the Project, which will be addressed in the EIR for this Project:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Services

Based on the Initial Study determination, LA County has determined that there is not a likelihood of potentially significant effects related to the following environmental topics:

- Agriculture/Forestry
- Biological Resources
- Mineral Resources
- Wildfire

As these environmental issues do not rise to the level of significant impacts, they will not be addressed in detail in the EIR. LA County proposes that the EIR will indicate the reasons why these effects were determined not to be significant in a section entitled "Impacts Found to Be Less Than Significant."

**NOTICE OF SCOPING MEETING:** The Los Angeles County Department of Regional Planning will conduct an online public scoping meeting to inform the public and interested agencies about the proposed Project and solicit oral and written comments as to the appropriate scope and content of the EIR. The scoping meeting will be held online via Zoom on **March 25, 2021 at 5:00 p.m. PST** Please visit: https://planning.lacounty.gov/fftod/Events.

The scoping meeting will include a brief presentation of the Project to be addressed in the EIR and will provide attendees with an opportunity to provide input to the scope of the EIR.

Interested parties may register to attend the virtual scoping meeting by navigating to the link above, or by clicking here: https://zoom.us/j/99707029370?pwd=SldrNjJwWnM5dzJoMUl0NlowZ0ZoQT09. Once registered, you will receive a confirmation from Zoom with a link to access the public scoping meeting and information on how to access the meeting either via computer/smartphone or a call-in phone number.

Translation of the scoping meeting presentation into other languages can be made available upon request. Please submit translation requests at least seven business days in advance of the scheduled meeting to nornelas@planning.lacounty.gov.

**PUBLIC REVIEW PERIOD:** LA County invites interested parties to provide written or verbal comments as to your specific concerns about the Project's potential environmental effects. LA County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. The 30-day comment period for the NOP begins on **March 15, 2021 and concludes on April 14, 2021**. Due to the time limits mandated by State law, please send your written response to the Los Angeles County Department of Regional Planning at the address below at the earliest possible date but no later than **April 14, 2021 at 5:00 p.m. PST**. Please include your name and address for all written correspondences.

Please direct all written comments to:

Norman Ornelas, Jr., Regional Planner
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, California 90012
Telephone: (213) 974-6316
Fax: (213) 626-0434
Email: nornelas@planning.lacounty.gov

All written responses will be included in an Appendix to the Draft EIR and their contents considered in accordance with Sate and LA County environmental guidelines.

**DOCUMENT AVAILABILITY:** Due to the current COVID-19 pandemic, LA County offices and library branches are currently closed to the public. The public is encouraged to visit the Los Angeles County Department of Regional Planning's website to review the Initial Study at: https://planning.lacounty.gov/fftod/.

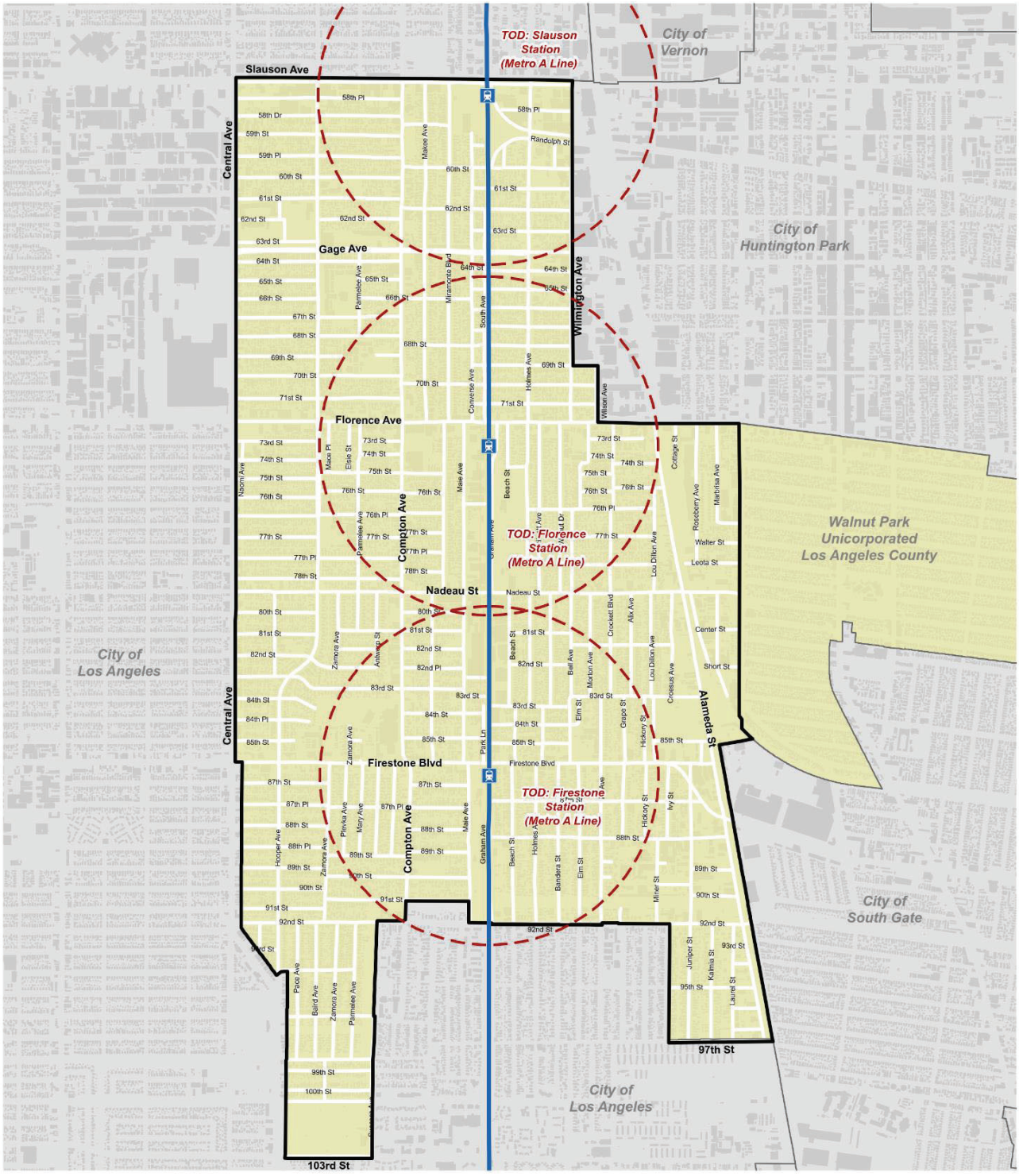



**Figure 1 Project Location**

# Environmental Checklist Form (Initial Study)

**County of Los Angeles, Department of Regional Planning**

**Project title: "**Florence-Firestone Transit-Oriented District Specific Plan" / Project No. PRJ2020-003127 / Case No(s). Specific Plan: RPPL2020009556, Environmental: RPPL2020009523

**Lead agency name and address:** Los Angeles County Department of Regional Planning (DRP), 320 West Temple Street, Los Angeles, CA 90012

**Contact Person and phone number:** Norman Ornelas, Jr., (213) 974-6316

**Project sponsor's name and address:** Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

**Project location:** The proposed Florence-Firestone Transit-Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Area encompasses the Los Angeles County (LA County) unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.6 square miles. The area is bound by the City of Los Angeles to the north, south, and west. The City of Huntington Park, the City of South Gate, and the unincorporated community of Walnut Park are to the east of the community area. The Metro A Line (previously Metro Blue Line), which connects downtown Los Angeles to Long Beach, has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone Stations) and operates numerous bus routes in the community. Three freeways (I-110, I-105, I-10) are within a 2.5-mile radius of the community. Figure 1 shows the Regional Location of the FFTOD Specific Plan Area and Figure 2 shows the Project Location.

*APN*: Various *USGS Quad*: Inglewood and South Gate

**Gross acreage:** 3.6 square miles

**General plan designations:** Figure 3 shows the existing General Plan Land Use Designations for the FFTOD Specific Plan Area, which are summarized below:

- Residential 9 (H9, single-family residences)
- Residential 18 (H18, single-family and two-family residences)
- Residential 30 (H30, single-family and multi-family residences)
- General Commercial (CG)
- Heavy Industrial (IH)
- Light Industrial (IL)
- Mixed Use (MU)
- Parks and Recreation (OS-PR)
- Public and Semi-Public (P)

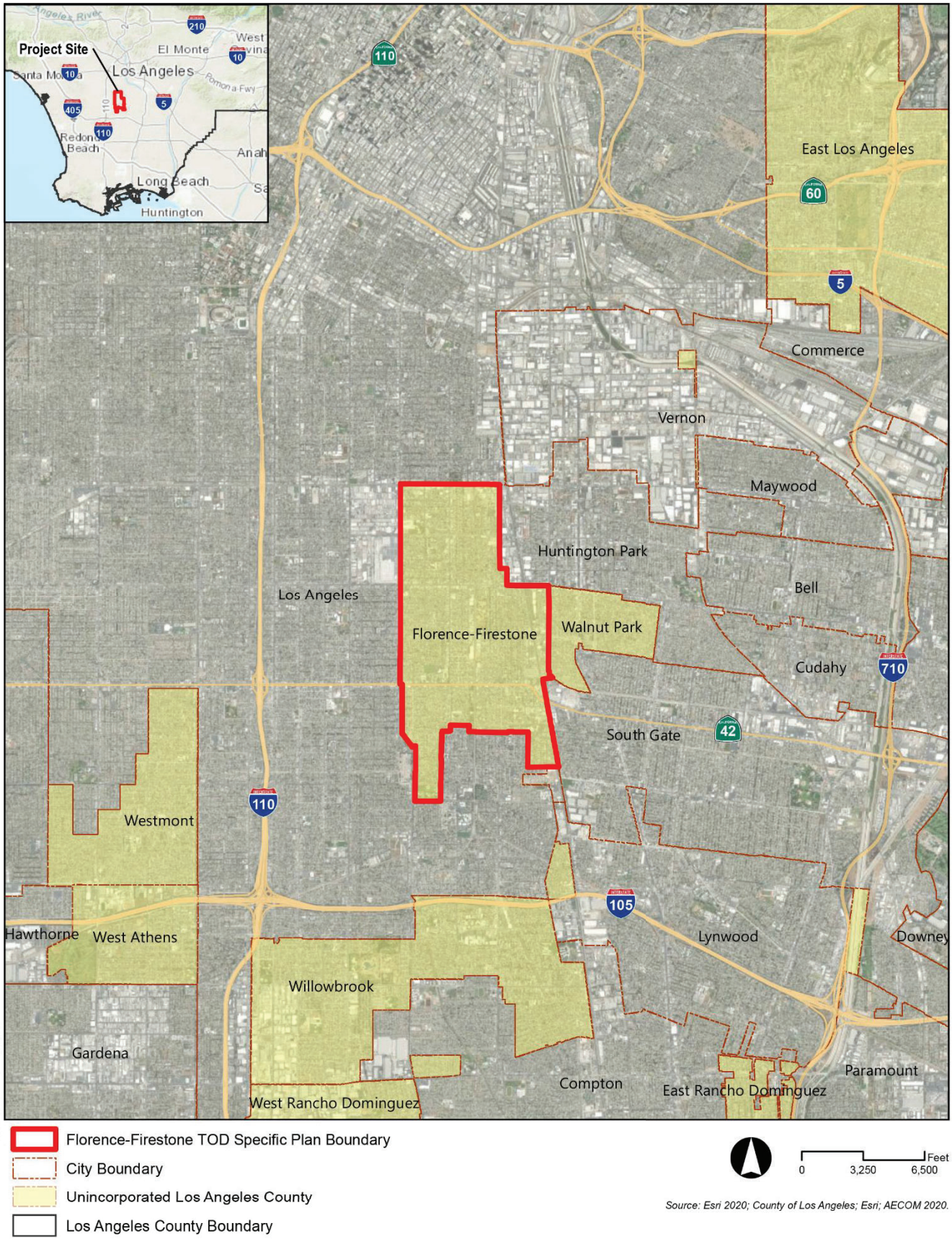



Figure 1 Regional Location

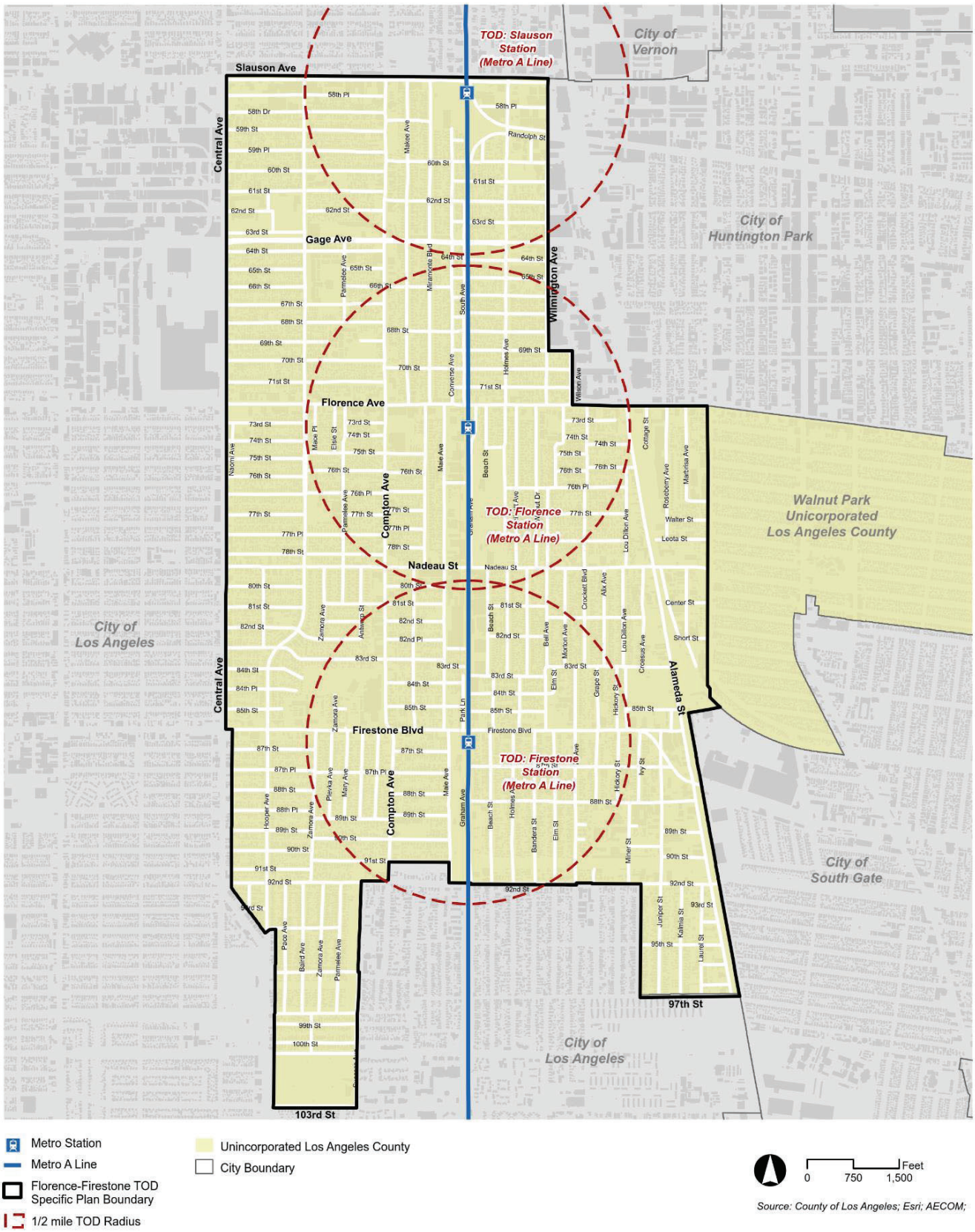



Figure 2 Project Location

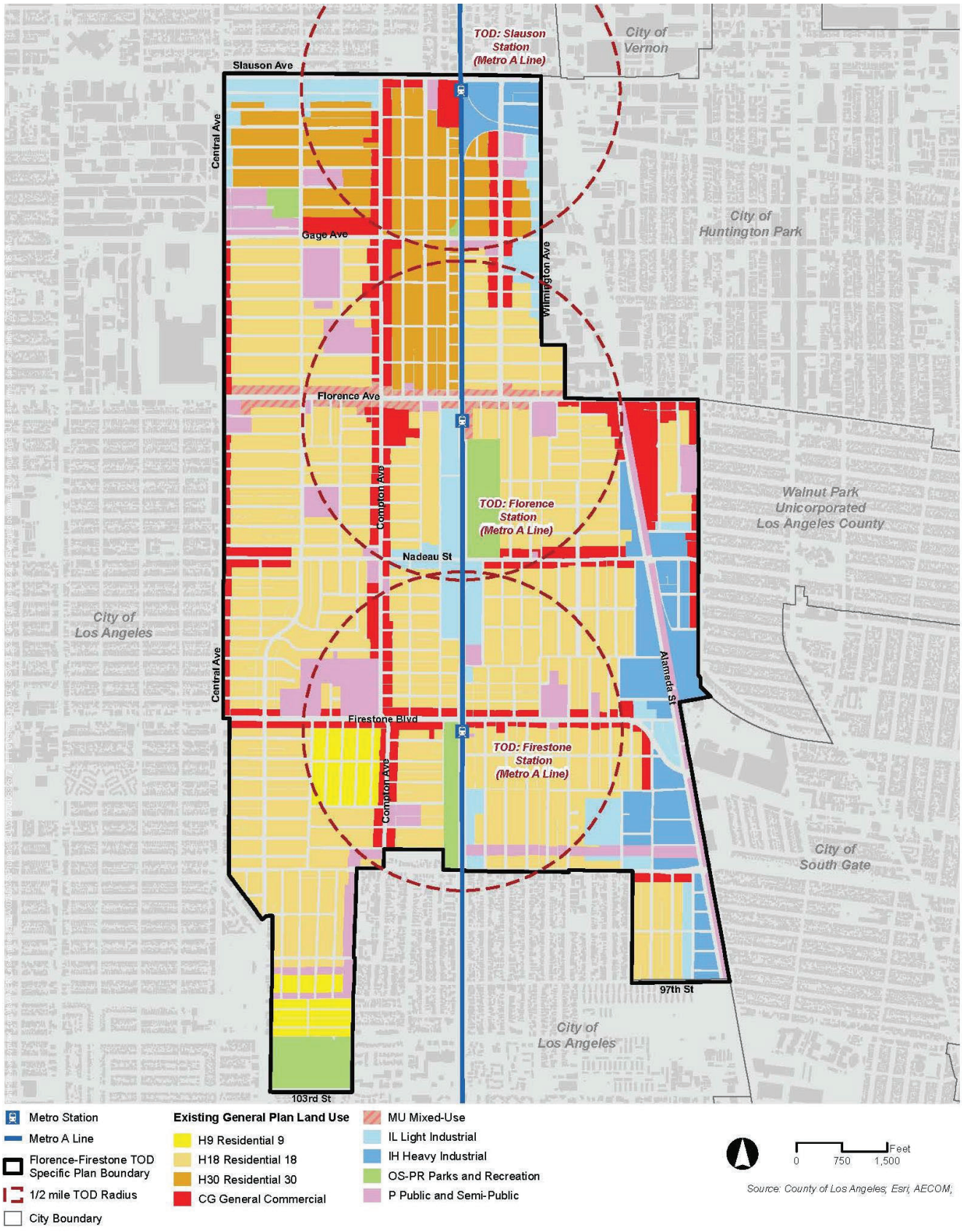



Figure 3 Existing General Plan Land Use Designations for the FFTOD Specific Plan Area

**Community/Area wide Plan designation:** The Project is currently regulated by the Florence Firestone Community Plan (FFCP) adopted in 2019 that utilizes the General Plan Land Use Designations as stated above. Although the community is predominantly residential, industrial uses are the second most common land use.

**Zoning:** Zoning for the FFTOD Specific Plan Area is regulated by LA County Code (code) of Ordinances Title 22; base zones in Division 3 of the code apply, with additional Florence-Firestone Community Standards District (FFCSD) in Division 12 Chapter 22.324 applicable. Residential zones comprise the majority of zoning categories in the proposed FFTOD Specific Plan Area, totaling approximately 63 percent of all land. The largest overall zone category, including residential, is the Limited Density Multiple Residence zone (R-3), making up approximately 32 percent of land in the FFTOD Specific Plan. Figure 4 shows the zoning categories for the FFTOD Specific Plan Area, which are summarized below.

- Single-Family Residence (R-1)
- Two-Family Residence (R-2)
- Limited Density Multiple Residence (R-3-()U)
- Medium Density Multiple Residence (R-4-()U) (listed as Unlimited Residential in the FFCP)
- Residential Planned Development (RPD)
- Light Agricultural (A-1)
- Neighborhood Business (C-2)
- General Commercial (C-3)
- Commercial Manufacturing (C-M)
- Mixed Use Development (MXD)
- Light Manufacturing (M-1)
- Restricted Heavy Manufacturing (M-1.5)
- Heavy Manufacturing (M-2)
- Unclassified (M-3)
- Institutional (IT)
- Open Space (O-S)

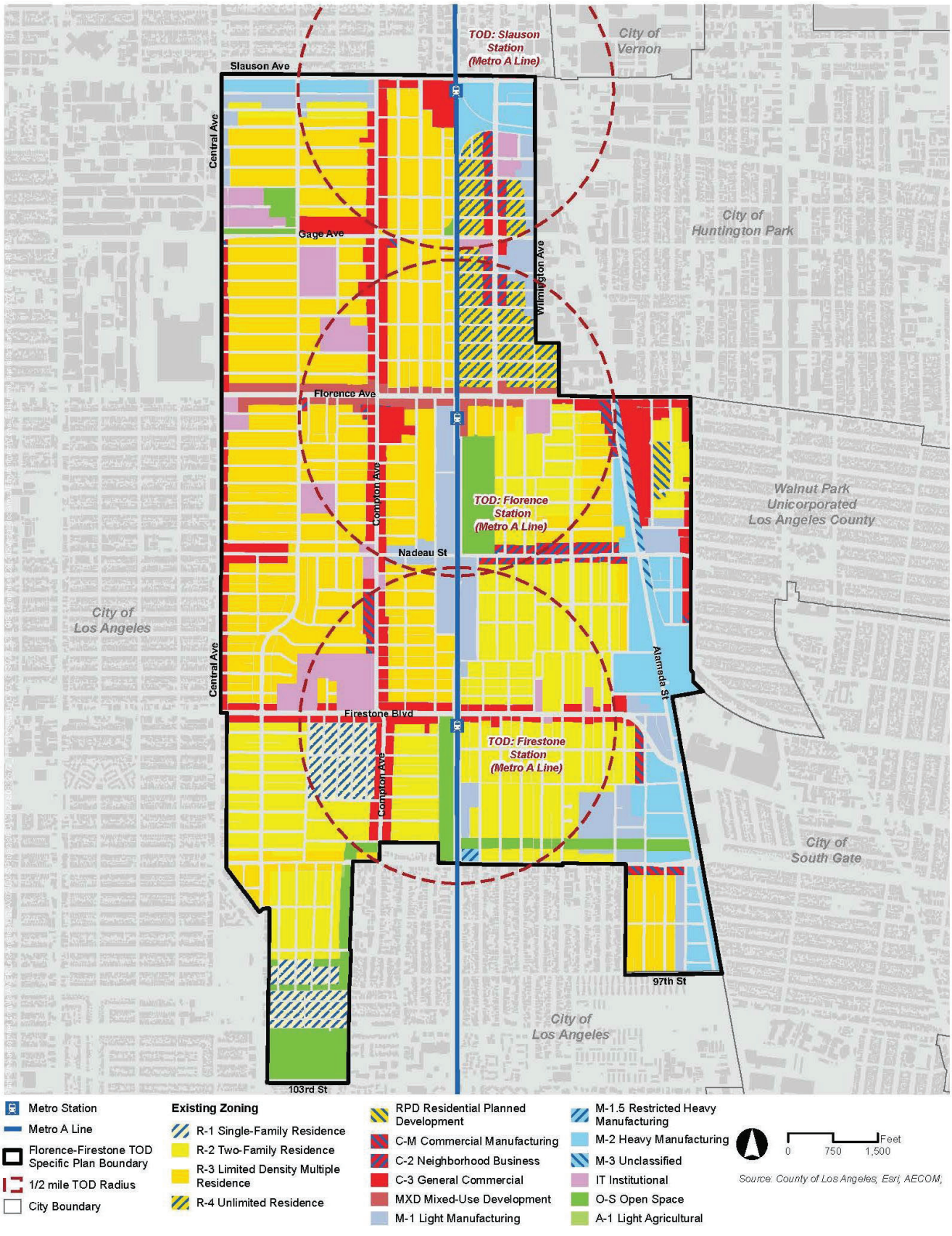



Figure 4 Existing Zoning Categories for the FFTOD Specific Plan Area

**Description of project:** The proposed FFTOD Specific Plan will implement the LA County General Plan 2035 (General Plan) TOD Program. TODs are defined in the General Plan as the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, three Metro A Line Stations are present: the Slauson, Florence, and Firestone Stations. The primary goals of the FFTOD Specific Plan are to the following:

- create transit-accessible housing development;
- increase job-generating uses and economic activity;
- develop a safe and attractive transportation network;
- increase walking, bicycling, and transit ridership; and
- streamline the environmental review process for future development projects in the community.

To advance these goals and provide consistency with the General Plan TOD Program and the FFCP, the FFTOD Specific Plan will establish:

- new transit-supportive zoning categories with standards and design guidelines focused within the 0.5-mile TOD radius of the three Metro A Line Stations (see Figure 8 for focused change areas), and
- mobility strategies that address infrastructure, access and connectivity pedestrian improvements, and safety to increase transit access within the FFTOD Specific Plan Area.

The FFTOD Specific Plan would propose new zoning categories and standards, primarily within the 0.5-mile TOD area of the three Metro A Line Stations, that include development standards and design guidelines appropriate for meeting the planned density and intensity established by the General Plan Land Use Designations. New zoning standards would also include setback and parking standards to address mobility issues in the community. The Project would also update zoning categories for sites identified for the Regional Housing Needs Assessment (RHNA) by the Housing Element update (HEU); Figure 7 identified these sites as 'Draft HEU RHNA Parcel.'

As discussed, the existing conditions of some sidewalks within the FFTOD Specific Plan Area are narrow, are damaged, and do not provide safe walkability. Consistent with the Los Angeles County Public Works Transit-Oriented District (TOD) Toolkit (2019), the FFTOD Specific Plan would propose implementation recommendations to widen sidewalks at key locations within the 0.5-mile TOD areas (portions of Slauson Avenue, Compton Avenue, Holmes Avenue, Nadeau Street, and Firestone Boulevard) from the current range of 6 feet to 14 feet to the desired 12 feet to 15 feet and parkways with a minimum of 10 feet.

The combination of zoning standards and mobility strategy recommendations would address current and future levels of sidewalk activity and incorporate pedestrian-oriented and "active" street design. The FFTOD Specific Plan may reduce or alter the number of required parking spaces associated with mixed-use development or within proximity to the Metro transit stations. This may include lower or altered parking requirements for land use categories such as residential, commercial, entertainment, assembly, and dining, and business and professional office. These changes would help facilitate the TOD and encourage affordable development for the community.

The employment rate in the FFTOD Specific Plan Area is robust, with 63.5 percent of persons aged 16 years or older employed (2010 US Census). Jobs tend to be oriented towards manufacturing, transportation, and warehousing due to proximity to ports and the freight corridor leading to the intermodal terminals south of downtown Los Angeles. These jobs tend to generate more truck trips than other employment

types, resulting in a higher volume of truck traffic that can negatively impact the population in terms of public health and safety (SELA Transportation Study, 2017).

The FFTOD Specific Plan Area is within a designated Southern California Association of Government (SCAG) environmental justice area, indicating that low-income and minority populations have disproportionately borne many of the negative impacts of increased traffic over the years, including exposure to greater than average health risks from air pollution. To support the LA County efforts to reinvest in transit-supportive economic development and multi-modal facilities, the Project proposes new transit-supportive zoning categories at underutilized opportunity sites directly adjacent to the Slauson Station (see Figure 8 for focused change areas). These sites are currently zoned as heavy industrial with generally low-intensity on-site development or general commercial uses. The land use designation is proposed to be updated to Mixed-Use (MU), and re-zoned to be transit supportive and neighborhood serving. The Project would also identify infrastructure and provide recommendations for mobility improvements needed to support the land use and zoning changes in the FFTOD Specific Plan Area and create more housing opportunities that protect against the displacement of existing residents in the community. In addition to amending the land use policy map and establishing new zoning categories, the Project would amend and incorporate standards from the FFCSD into the FFTOD Specific Plan. Incorporation of the FFCSD would allow all land use regulations applicable to the Florence-Firestone community to be compiled into a single document for ease of review and implementation.

The FFTOD Specific Plan proposes the following nine new zoning categories: Industrial Flex (IF), Mixed-Use 1 (MU-1), Mixed-Use (MU-2), Mixed-Use 3 (MU-3), Mixed-Use Transit (MU-T), Residential Low-Medium 1 (RLM-1), Residential Low-Medium 2 (RLM-2), Residential Medium (RM) and Residential Slauson Station (RSS). These zoning categories are listed with their corresponding General Plan land use categories in Table 1; zoning categories names/titles are subject to change to match LA County naming conventions as the FFTOD Specific Plan is further developed.

**Table 1:** FFTOD Specific Plan Zoning Categories

| General Plan Land Use Designations | Proposed Draft FFTOD Specific Plan Zoning Categories | Allowed Intensity / Density (Consistent with the General Plan Land Use Designation) |
|---|---|---|
| **Proposed New Zoning Categories to Be Applied** | | |
| **IL Light Industrial** | - Industrial Flex (IF) | - 1.0 Floor Area Ratio (FAR) |
| **MU Mixed-Use** | - Mixed-Use 2 (MU-2)<br>- Mixed-Use 3 (MU-3)<br>- Mixed-Use Transit (MU-T) | - 3.0 FAR (non-residential component); minimum 50 dwelling units (du)/net acre, maximum 150 du/net acre |
| **CM Commercial Major** | - Mixed-Use 1 (MU-1) | - 3.0 FAR (non-residential component); minimum 30 du/net acre, maximum 150 du/net acre |
| **H18 Residential** | - Residential Low-Medium 1 (RLM-1) | - 0 du/net acre, maximum 18 du/net acre |
| **H30 Residential** | - Residential Low-Medium 2 (RLM-2) | - Minimum 20 du/net acre, maximum 30 du/net acre |
| **H50 Residential** | - Residential Medium (RM) | - Minimum 20 du/net acre, maximum 50 du/net acre |
| **H100 Residential** | - Residential Slauson Station (RSS) | - Minimum 50 du/net acre, maximum 100 du/net acre |
| **Existing Title 22 Zoning Categories to Be Applied** | | |
| **H9 Residential** | - Single-Family Residence (R-1) | - 0 du/net acre, maximum 9 du/net acre |
| **H18 Residential** | - Two-Family Residence (R-2) | - 0 du/net acre, maximum 18 du/net acre |
| **GC General Commercial** | - General Commercial (C-3) | - 1.0 FAR (non-residential component); 0 du/net acre, maximum 50 du/net acre |
| **MU Mixed-Use** | - Mixed-Use Development (MXD) | - 3.0 FAR (non-residential component); minimum 50 du/net acre, maximum 150 du/net acre |
| **IL Light Industrial** | - Light Manufacturing | - 1.0 Floor Area Ratio (FAR) |
| **IH Heavy Industrial** | - Heavy Manufacturing | - 1.0 Floor Area Ratio (FAR) |
| **OS-PR Parks and Recreation** | - Open Space<br>- Light Agricultural | - N/A |
| **P Public and Semi-Public** | - Institutional | - 3.0 Floor Area Ratio (FAR) |

The intent of the proposed new zoning categories listed in Table 1 is further described below:

1. **Industrial Flex (IF) Zoning Category**– The IF Zoning Category is intended to maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for mixed residential and employment areas. The zoning category allows for transitions between employment and residential uses to encourage less noxious uses, such as commercial to abut homes, supporting the goals of the LA County draft Green Zones Program and Ordinance. This zoning category allows uses focused on light industrial, neighborhood-serving commercial and office and does not allow residential uses. The IF Zoning Category implements the General Plan Land Use Designation IL Light Industrial.

2. **Mixed-Use Transit (MU-T) Zoning Category** – The MU-T Zoning Category is intended to create a high-intensity mixed-use transit district with a variety of housing, jobs, and neighborhood services within existing commercial and industrial areas surrounding the Slauson Station. This

zoning category will allow uses that encourage a more pedestrian-oriented setting with active uses to encourage walking, biking, and multi-modal transportation. The MU-T Zoning Category implements the General Plan Land Use Designation MU Mixed Use.

3. **Mixed-Use 3 (MU-3) Zoning Category** – The MU-3 Zoning Category is intended to support employment and higher-density residential uses by encouraging greater job opportunities and homes for communities near transit, focused in existing industrial areas with large sites surrounding the Florence Station. The purpose of this zoning category is to create an employment-focused, high-intensity mixed-use transit district that allows for transitions between industrial areas and homes with less environmentally intensive uses, such as offices. The MU-3 Zoning Category implements the General Plan Land Use Designation MU Mixed Use.

4. **Mixed-Use 2 (MU-2) Zoning Category** – The MU-2 Zoning Category is intended to support "main street" retail, employment, and homes for the communities near transit along existing commercial corridors surrounding the Slauson and Florence Stations. This zoning category allows uses focused on local neighborhood services, such as local-serving retail, personal services including salons and accountants, and food or groceries, and homes. The MU-2 Zoning Category implements the General Plan Land Use Designation MU Mixed Use.

5. **Mixed-Use 1 (MU-1) Zoning Category** – The MU-1 Zoning Category is intended to support mixed-use corridors near transit to provide a range of local neighborhood services and homes near transit. The MU-1 Zoning Category implements the General Plan Land Use Designation CM Commercial Major.

6. **Residential Low-Medium 1 (RLM-1) Zoning Category** – The RLM-1 Zoning Category is intended to maintain existing residential neighborhoods while supporting a broader range of housing types and configurations, such as duplexes, triplexes, and detached townhomes. The RLM-1 Zoning Category implements the General Plan Land Use Designation H18 Residential.

7. **Residential Low-Medium 2 (RLM-2) Zoning Category** – The RLM-2 Zoning Category is intended to maintain existing residential neighborhoods while supporting a broader range of housing types and configurations, such as attached townhomes, apartments, triplexes, and fourplexes. The RLM-2 Zoning Category implements the General Plan Land Use Designation H30 Residential.

8. **Residential Medium (RM) Zoning Category –** The RM Zoning Category is intended to apply to existing residential neighborhoods where the purpose is to encourage medium-density residential housing near transit. The zoning category allows multi-family residential homes such as apartments and townhomes. The RM Zoning Category implements the General Plan Land Use Designation H50 Residential.

9. **Residential Slauson Station (RSS) Zoning Category –** The RSS Zoning Category is intended to encourage the establishment of high-density residential housing near transit in existing neighborhoods. The RSS Zoning Category seeks to provide a wider range of housing types and densities, supporting transit-oriented development. The RSS Zoning Category implements the General Plan Land Use Designation H100 Residential.

Figure 5 shows the proposed land use designations for the FFTOD Specific Plan Area; Figure 6 identifies the change areas comparing the existing land use designations to the proposed land use designations. Figure 7 shows the new zoning categories proposed by the Project; Figure 8 identifies the change areas comparing the existing zoning categories to the proposed zoning categories.

Adoption of the FFTOD Specific Plan would result in a concurrent amendment to:

A. The LA County General Plan to change the land use designations of the identified properties.

B. The FFCP to:
   1) Change the land use designations of the identified properties and references to the FFCSD.
   2) Correct a few zoning categories and/or associated zoning category names to be consistent with the Zoning Code classifications of Title 22. Specifically, zone C-2 would be renamed from "Neighborhood Business" to "Neighborhood Commercial." In addition, zoning categories "R-3-()U – Limited Density Multiple Residence" would be changed to "R-3 – Limited Density Multiple Residence" and "R-4-()U – Medium Density Multiple Residence" would be changed to "R-4 – Medium Density Multiple Residence." The proposed minor revisions to the FFCP will merely make an editorial correction to reflect the correct zoning category and/or the associated category name. It would not change the pattern, types, or density of land uses that are currently allowed under the Zoning Code.

C. The LA County Code, Title 22 to:
   1) Change the zoning categories of identified properties to encourage a mix of transit-oriented development and land uses that would, in part, provide more opportunities for affordable housing and a greater mix of housing options and employment opportunities.
   2) Add a new section to establish the FFTOD Specific Plan.
   3) Remove section 22.324; the FFCSD would be replaced by the standards set forth in the FFTOD Specific Plan.

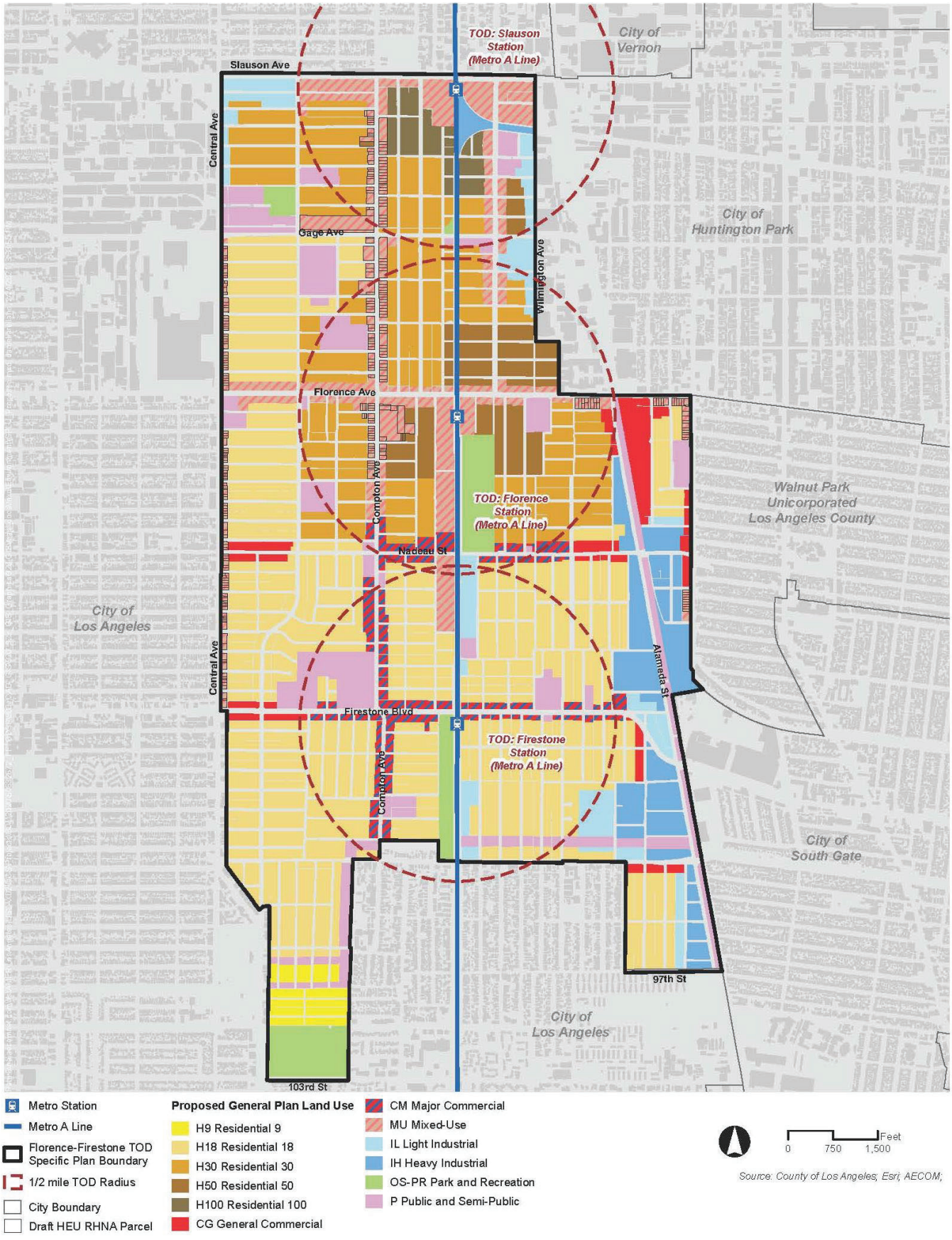



Figure 5 Proposed General Plan Land Use Designations for the FFTOD Specific Plan Area

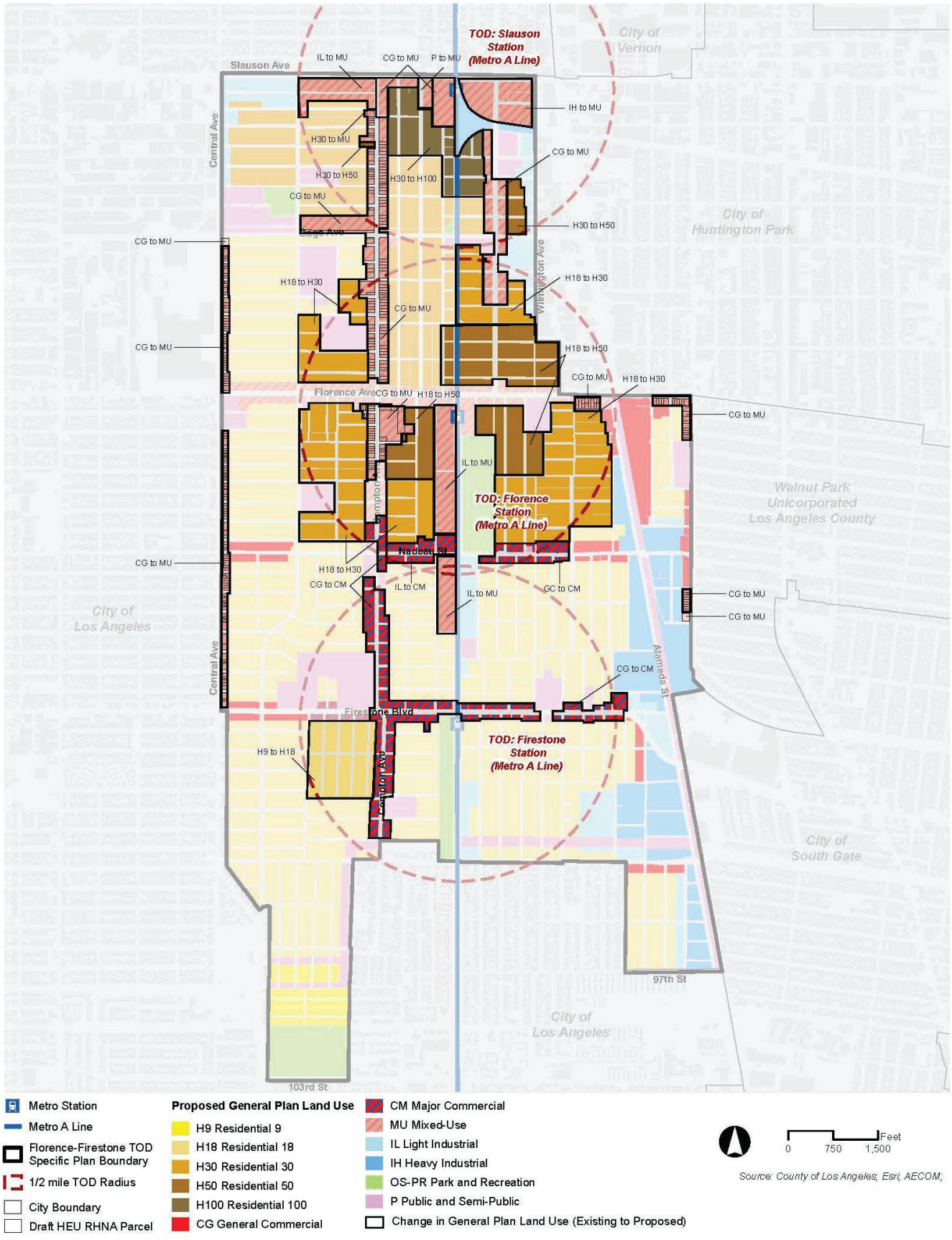



Figure 6 Proposed General Plan Land Use Designations (Change Areas) for the FFTOD Specific Plan Area

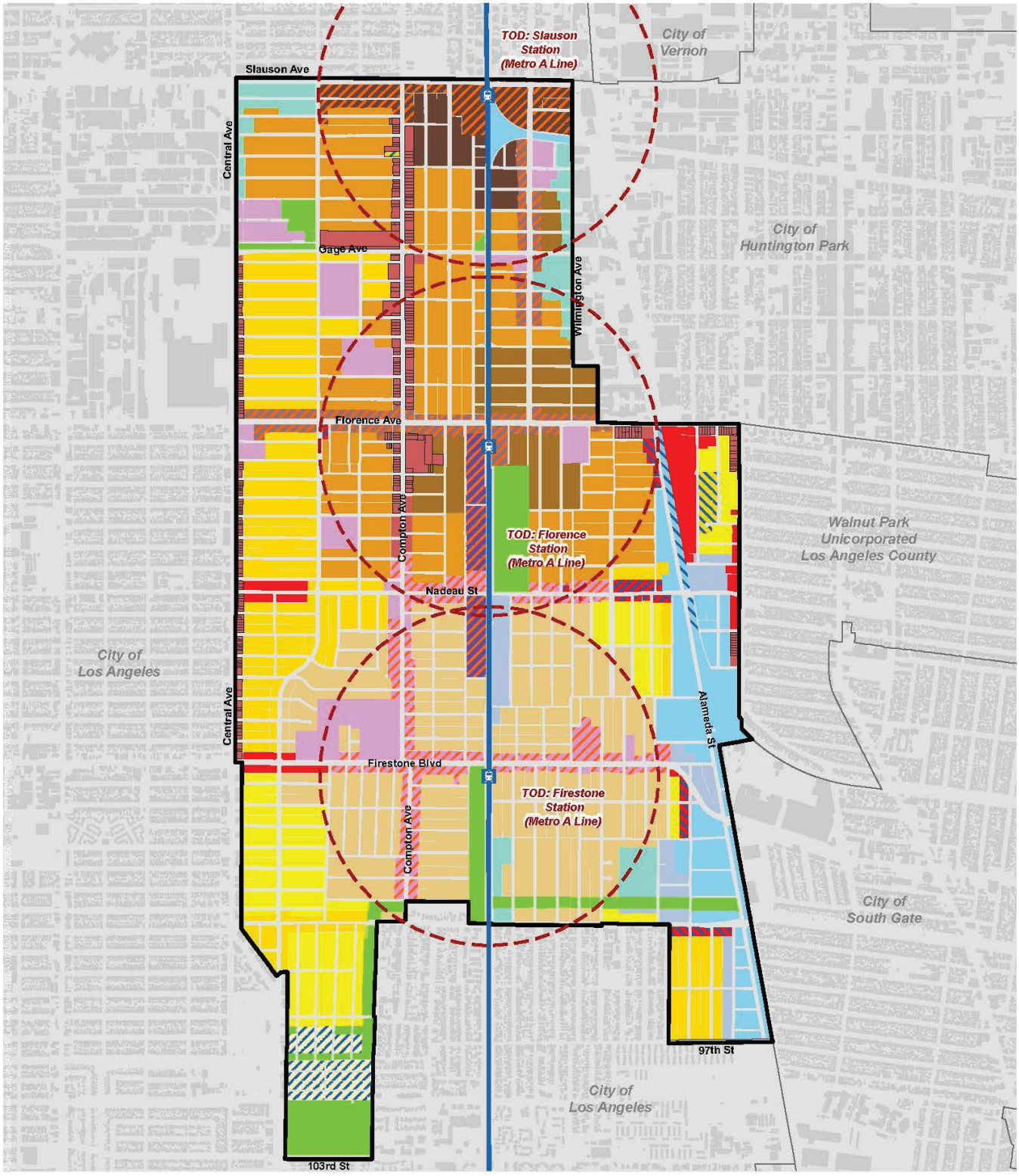



Figure 7 Proposed Zoning Categories for the FFTOD Specific Plan Area

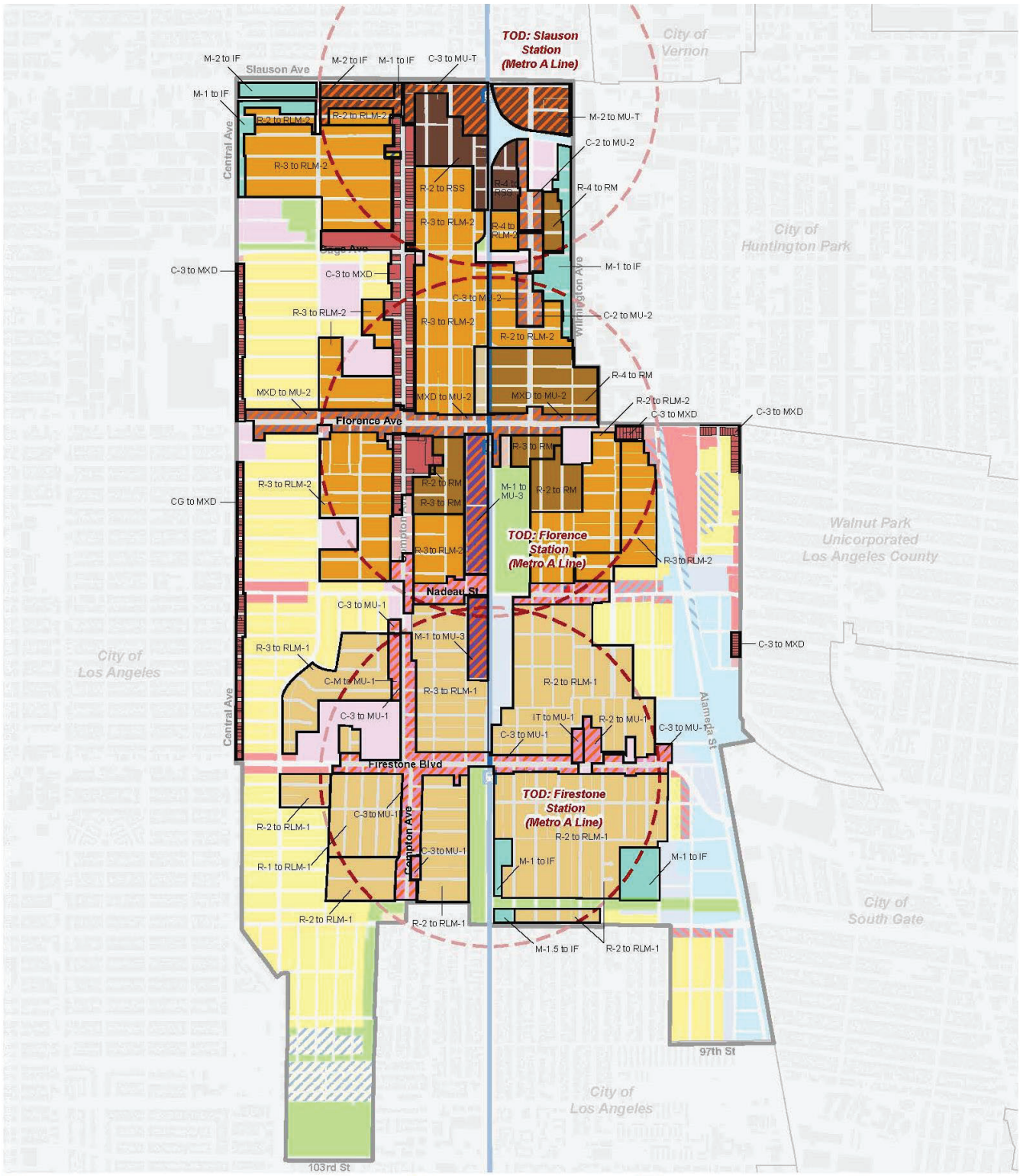



Figure 8 Proposed Zoning Categories (Change Areas) for the FFTOD Specific Plan Area

**Surrounding land uses and setting:** The FFTOD Specific Plan Area is surrounded on the north, south, and west by the City of Los Angeles and on the east by the City of Huntington Park, the City of South Gate, and the unincorporated community of Walnut Park. The community is between downtown Los Angeles and downtown Long Beach in proximity to major employment centers, including downtown Los Angeles, the Ports of Long Beach and Los Angeles, and the industrial sector in southeast LA County. The area surrounding the proposed FFTOD Specific Plan Area is heavily urbanized with residential, commercial, and industrial land uses. Specifically, the City of Los Angeles land uses surrounding the FFTOD Specific Plan Area to the north, west, and south include commercial, industrial, single-family and multi-family residential, open space, and public facilities. The City of Huntington Park land uses bordering the FFTOD Specific Plan Area to the east include manufacturing and general commercial. The City of South Gate land uses bordering the FFTOD Specific Plan Area to the east include regional commercial, neighborhood medium residential, and light industrial. The unincorporated community of Walnut Park land uses bordering the FFTOD Specific Plan Area to the east include mixed commercial and general commercial.

The existing setting of the FFTOD Specific Plan Area includes three Metro A Line Stations that connect the community to major job centers and regional destinations spanning from downtown Los Angeles to Long Beach. In addition, Metro Bus routes and Los Angeles Department of Transportation DASH routes serve the area. The proposed FFTOD Specific Plan land use and mobility strategies would be focused in proximity to the Metro A Line Station areas to make it easier for bicyclists and pedestrians to access the stations. While multiple public transit options can be found in the community, access to transit is hindered by critical safety barriers for pedestrians and cyclists, including narrow and damaged sidewalks, poor lighting, lack of transit-supportive wayfinding signage, lack of connecting bikeways, and few station access points to the elevated platform (at the Slauson Station). Land uses near the stations are predominantly industrial, including land dedicated for railroad operations and a large open storage facility adjacent to Slauson Station. This existing land use pattern is a barrier for connecting jobs and housing more closely to the transit services. Current access points to the stations are narrow and difficult to navigate. Bus stops in the station area also lack basic accommodations such as benches, shelters, and sufficient lighting. Cyclists in the area lack safe, separated bicycle facilities and must instead travel in mixed-traffic, high-stress, and dangerous conditions that are not safe for children, elderly, or inexperienced cyclists. One Class II bicycle lane is disconnected to the local and regional bikeway network. Overall, the TOD area is not conducive to facilitating robust transit access and lack the community-serving land uses needed to increase transit use and encourage new transit-oriented development.

**Note:** Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

**Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):**

| *Public Agency* | *Approval Required* |
|---|---|
| _____ | _____ |
| _____ | _____ |

**Major projects in the area:**

| *Project/Case No.* | *Description and Status* |
|---|---|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

**Reviewing Agencies:**

*Responsible Agencies*

- ☐ None
- Regional Water Quality Control Board:
  - ☒ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☐ Army Corps of Engineers
- ☐ LAFCO

*Special Reviewing Agencies*

- ☒ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of Santa Monica Mountains Area

*Regional Significance*

- ☐ None
- ☒ SCAG Criteria
- ☒ Air Quality
- ☐ Water Resources
- ☐ Santa Monica Mtns. Area
- ☒ City of Los Angeles
- ☒ City of Huntington Park
- ☒ City of South Gate

*Trustee Agencies*

- ☐ None
- ☒ State Dept. of Fish and Wildlife
- ☐ State Dept. of Parks and Recreation
- ☐ State Lands Commission
- ☐ University of California (Natural Land and Water Reserves System)

*County Reviewing Agencies*

- ☒ DPW
- ☒ Fire Department
  - -Planning Division
  - - Land Development Unit
  - - Health Hazmat
- ☒ Sanitation District
- ☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- ☒ Sheriff Department
- ☒ Parks and Recreation
- ☐ Subdivision Committee
- ☒ Los Angeles Unified School District
- ☒ Los Angeles County Library

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

| | | |
|---|---|---|
| ☒ Aesthetics | ☒ Greenhouse Gas Emissions | ☒ Public Services |
| ☐ Agriculture/Forestry | ☒ Hazards/Hazardous Materials | ☒ Recreation |
| ☒ Air Quality | ☒ Hydrology/Water Quality | ☒ Transportation |
| ☐ Biological Resources | ☒ Land Use/Planning | ☒ Tribal Cultural Resources |
| ☒ Cultural Resources | ☐ Mineral Resources | ☒ Utilities/Services |
| ☒ Energy | ☒ Noise | ☐ Wildfire |
| ☒ Geology/Soils | ☒ Population/Housing | ☒ Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Norman Ornelas Jr — 3/11/2021
Signature (Prepared by) — Date

Patricia L. Hachiya — 3/11/2021
Signature (Approved by) — Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the LA County General Plan, other LA County planning documents, and LA County ordinances. Some thresholds are unique to geographical locations.

## 1. AESTHETICS

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Except as provided in Public Resources Code Section 21099, would the project:** | | | | |
| **a) Have a substantial adverse effect on a scenic vista?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** Scenic vistas include views of scenic resources, such as designated scenic highways and corridors (or routes), hillsides, viewsheds and ridgelines, or other unusual scenic landforms, from any given location. Florence-Firestone is an urbanized community approximately 6 miles south of downtown Los Angeles. Typical views within the FFTOD Specific Plan Area consist of urban development and associated roadways and landscaping. Implementation of the FFTOD Specific Plan would result in redevelopment and infill development of residential, mixed-use, and industrial buildings with maximum heights ranging from 36 to 72 feet. There are no designated scenic highways, significant ridgelines, or other identified scenic resources within the FFTOD Specific Plan Area. The closest scenic highway to the FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. The nearest significant ridgeline to the FFTOD Specific Plan Area is the Santa Monica Mountains, approximately 10 miles north. As a result, impacts to scenic vistas related to implementation of the FFTOD Specific Plan would be less than significant. This issue will not be analyzed further in the Environmental Impact Report (EIR).

| | | | | |
|---|---|---|---|---|
| **b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** According to the Trails Map by the Los Angeles County Department of Parks and Recreation, no LA County trails are within the FFTOD Specific Plan Area. The closest riding, hiking, or multi-use trail is the Rio Hondo River Trail, approximately 5 miles east of the FFTOD Specific Plan Area. Therefore, the Project would not be visible or obstruct views from a regional trail, and no impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** Based on a review of the California Department of Transportation Scenic Highways Program, no state scenic highways are located within the FFTOD Specific Plan Area. The closest scenic highway to the FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. Thus, the FFTOD Specific Plan Area is not visible from this highway, and the Project would not result in impacts to scenic resources within view of a state scenic highway. The Project would not damage scenic resources and no impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing** | ☒ | ☐ | ☐ | ☐ |

**scenic quality? (Public views are those that are experienced from publicly accessible vantage point)**

**Potentially Significant Impact.** Implementation of the FFTOD Specific Plan would entail some changes to the visual character of the FFTOD Specific Plan Area. The Project would enable industrial, mixed-use, commercial, and residential land uses and provide recommendations for mobility improvements that support increased housing density and employment in proximity to the three Metro A Line Stations in the community (i.e., Slauson, Florence, and Firestone Stations). These improvements would allow for increased intensity, taller buildings, or streetscape changes that are consistent with a TOD development pattern that could alter the existing visual character or quality of public views of the FFTOD Specific Plan Area and its surroundings. The impact is considered potentially significant and will be further analyzed in the EIR.

**e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses, and has existing lighting including streetlights, commercial signage, vehicle lights, parking lot lights, and building lights. The Project would enable industrial, mixed-use, commercial, and residential land uses and provide recommendations for mobility improvements that support increased housing density and employment in proximity to the three Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. These improvements would allow for increased intensity, taller buildings, or streetscape changes consistent with a TOD development pattern that could create new sources of shadow, light, or glare. The impact is considered potentially significant and will be further analyzed in the EIR.

**References**

California Department of Transportation, Scenic Highways Program, available at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed November 2, 2020.

California State Parks Office of Historic Preservation, California Historical Landmarks for Los Angeles County, available at https://ohp.parks.ca.gov/?page_id=21427, accessed February 2, 2021.

Los Angeles County Department of Parks and Recreation, Trails Los Angeles County Map, available at https://trails.lacounty.gov, accessed November 2, 2020.

National Park Service, National Register of Historic Places, available at https://www.nps.gov/subjects/nationalregister/database-research.htm#table, accessed February 2, 2021.

## 2. AGRICULTURE / FOREST

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

| | ***Potentially Significant Impact*** | ***Less Than Significant Impact with Mitigation Incorporated*** | ***Less Than Significant Impact*** | ***No Impact*** |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** According to the California Important Farmland Finder maintained by the California Department of Conservation, the majority of the FFTOD Specific Plan Area is designated as Urban and Built-Up Land, which indicates that the land is used for residential, industrial, commercial, and other developed purposes. There is an area of Unique Farmland, defined as farmland of lesser quality soils used for the production of the state's leading agricultural crops, at the southern boundary of the FFTOD Specific Plan Area west of Compton Avenue and south of 91st Street. The FFTOD Specific Plan would include zone changes for existing residential parcels adjacent to this area of Unique Farmland. However, the FFTOD Specific Plan would not convert the Unique Farmland to a non-agricultural use. Therefore, the impact would be less than significant. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** The Williamson Act enables local governments to enter contracts with private landowners to restrict specific parcels of land to agricultural or related open space use in exchange for reduced property tax assessments for the landowners. There are no existing Williamson Act contracts within this part of LA County, and there are no designated agricultural resource areas within the FFTOD Specific Plan Area. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not in an area zoned for forest land, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. Therefore, implementation of the Project would not conflict with or cause rezoning of forest land or timberland, and no impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **d) Result in the loss of forest land or conversion of forest land to non-forest use?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not zoned for forest land, nor does it contain any forests. Therefore, implementation of the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses. As discussed in Response 2a, Unique Farmland exists within the FFTOD Specific Plan Area. Although the FFTOD Specific Plan includes zone changes for existing residential parcels adjacent to this farmland, it does not propose converting the Unique Farmland to non-agricultural use. Additionally, the changes associated with the FFTOD Specific Plan would not be expected to result in future conversion of this farmland to non-agricultural use, as the farmland would remain within the same context of agricultural activities within an electrical transmission right-of-way that is surrounded by urban development. Therefore, the impact would be less than significant. This issue will not be analyzed further in the EIR.

**References**

State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County, Los Angeles County Important Farmland 2016 map, available at https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx, accessed November 2, 2020.

State of California Department of Conservation, Division of Land Resource Protection, Williamson Act Program, available at https://www.conservation.ca.gov/dlrp/wa, accessed November 2, 2020.

## 3. AIR QUALITY

*Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.*

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The South Coast Air Quality Management District manages air quality within the South Coast Air Basin, which includes the FFTOD Specific Plan Area. The Project would enable the development of industrial, mixed-use, commercial, and residential land uses and provide recommendations for mobility improvements that support increased housing density and employment in proximity to the three Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. Implementation of the FFTOD Specific Plan would generate pollutant emissions during construction and operation of new developments within the FFTOD Specific Plan Area. The impact is considered potentially significant and an Air Quality Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **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?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Project would enable the development of industrial, mixed-use, commercial, and residential land uses and provide recommendations for mobility improvements that support increased housing density and employment in proximity to the three Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. Implementation of the FFTOD Specific Plan would generate short- and long-term pollutant emissions from construction and operation of new developments within the FFTOD Specific Plan Area. Short-term emissions may result from construction activities such as demolition, excavation, and building construction. Although the Project would provide opportunities to promote active transportation and reduce vehicle miles traveled, the Project may result in a cumulatively considerable net increase of any criteria pollutant that could potentially conflict with state or federal ambient air quality standards due to the magnitude of the FFTOD Specific Plan Area. The impact is considered potentially significant and an Air Quality Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **c) Expose sensitive receptors to substantial pollutant concentrations?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Sensitive receptors are defined as locations used by people, or by persons that are more susceptible to the harmful health effects of emissions, such as children and the elderly. As discussed in Response 3b above, implementation of the FFTOD Specific Plan would generate short- and

long-term pollutant emissions from construction and operation of new developments within the FFTOD Specific Plan Area. Sensitive receptor locations within the Florence-Firestone community include residential areas, recreational areas, and schools. Future development may expose sensitive receptors within and near the FFTOD Specific Plan Area to substantial pollutant concentrations. The impact is considered potentially significant and an Air Quality Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan would accommodate light industrial land uses that would be less intensive than the existing permitted industrial land uses. Nonetheless, the light industrial uses may result in exposing a substantial number of people to other emissions, such as odors. The impact is considered potentially significant and an Air Quality Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

## 4. BIOLOGICAL RESOURCES

| Would the project: | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and lacks natural, vegetated areas (such as creeks or channels) that could support sensitive natural communities or native habitat for sensitive species. The proposed FFTOD Specific Plan provides for infill development within an already highly disturbed urban environment. Therefore, implementation of the FFTOD Specific Plan would not result in any direct impacts to special-status species identified as a candidate, sensitive, or special-status species. Any occurrence of a sensitive species in the FFTOD Specific Plan Area is expected to be an incidental occurrence, such as during foraging. It is anticipated that some trees would likely be removed to accommodate construction of development projects, which has the potential to impact nesting birds if future development occurs during the nesting season.

The Migratory Bird Treaty Act of 1918 (MBTA) prohibits the take (i.e., killing, capturing, selling, trading, or transport) of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA (United States Code Title 16, Chapter 7, Subchapter II, Sections 703-712). Compliance with the MBTA would generally include avoiding construction activities during the nesting season, February 15 through September 1, or if construction activities are to be undertaken during the nesting season, by conducting pre-construction nesting bird surveys and, if needed, providing a qualified biologist to monitor active nests to ensure construction does not affect species protected under the MBTA. Nesting birds are also protected under the California Fish and Game Code (Section 3505 et seq.). Section 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird, with specified exceptions. By law, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with the MBTA and California Fish and Game Code to protect migratory and nesting birds. As such, impacts to nesting birds would be less than significant. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** According to the National Wetlands Inventory managed by the USFWS, no riparian habitat or non-jurisdictional wetlands exist within the FFTOD Specific Plan Area. Additionally, as discussed in Response 4a, the FFTOD Specific Plan Area lacks natural, vegetated areas that could support sensitive natural communities or native habitat for sensitive species. The FFTOD Specific Plan Area is heavily urbanized with

residential and industrial land uses and the Project would not adversely affect any sensitive natural communities. No impact would occur. This issue will not be analyzed further in the EIR.

**c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?** ☐ ☐ ☐ ☒

**No Impact.** As discussed in Response 4b, according to the National Wetlands Inventory, there are no state or federally protected wetlands within the FFTOD Specific Plan Area, which is heavily urbanized. The closest mapped wetland to the FFTOD Specific Plan Area is Compton Creek, approximately 1.3 miles south of the FFTOD Specific Plan Area. Therefore, the Project would have no impact on wetlands. This issue will not be analyzed further in the EIR.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?** ☐ ☐ ☒ ☐

**Less Than Significant Impact**. The FFTOD Specific Plan Area is heavily urbanized and does not present suitable habitat to support the movement of native or migratory fish. Existing trees and vegetation in the FFTOD Specific Plan Area may be used as habitat by migratory birds. However, as discussed in Response 4a above, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with state and federal regulations that protect migratory wildlife, including the MBTA and California Fish and Game Code. Therefore, impacts would be less than significant. This issue will not be analyzed further in the EIR.

**e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?** ☐ ☐ ☐ ☒

**No Impact.** According to DRP's Distribution of Oak Species in LA County Map, there is no occurrence of oak woodlands or other unique native woodlands within or near the FFTOD Specific Plan Area, as the area is developed with urban land uses. Therefore, no impact would occur to oak woodlands or native woodlands. This issue will not be analyzed further in the EIR.

**f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or** ☐ ☐ ☒ ☐

**Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?**

**Less Than Significant Impact.** The only applicable local policy or ordinance protecting biological resources for the FFTOD Specific Plan Area is the Los Angeles County Oak Tree Ordinance (County Code of Ordinances Sections 22.56.2050 et seq.), which prohibits anyone from damaging or removing oak trees without a permit from DRP. Although no occurrence of oak woodlands or other unique native woodlands occur within or near the FFTOD Specific Plan Area as described in Response 4e, existing landscaping within the FFTOD Specific Plan Area may include oak trees. However, future proposed development under the FFTOD Specific Plan would be required to adhere to the Oak Tree Ordinance. The Oak Tree Ordinance requires permit applicants to submit a site plan and an oak tree report. The site plan should show the locations and dimensions of existing land uses; proposed features on the site; and the location of all oak trees subject to the ordinance proposed to be removed and/or relocated, or within 200 feet of proposed construction, grading, landfill, or other activity. The oak tree report should be prepared, by an individual with expertise acceptable to the director and LA County forester and fire warden, of each tree shown on the site plan describing the size, structure, and health of each tree; and identifying trees that may be classified as heritage trees – which are either any oak tree measuring 36 inches or more in diameter, measured 4.5 feet above the natural grade; or any other oak tree having significant historical or cultural importance to the community. As a result, the Project would not conflict with any local plans or policies protecting biological resources, and impacts would be less than significant. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** According to the Habitat Conservation Database managed by the USFWS, the FFTOD Specific Plan Area is not located in any adopted Habitat Conservation Plan area. In addition, based on the California Natural Community Conservation Plans Map created by CDFW, the FFTOD Specific Plan Area is not located in any Natural Community Conservation Plan area. No impact would occur. This issue will not be analyzed further in the EIR.

**References**

California Department of Fish and Wildlife, California Natural Community Conservation Plans Map, available at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed November 11, 2020.

Los Angeles County Department of Regional Planning, Distribution of Oak Species in LA County, available at https://planning.lacounty.gov/assets/upl/sea/Distribution_of_Oak_Species_in_LA_County.pdf, accessed November 2, 2020.

US Fish and Wildlife Service, Habitat Conservation Database, available at https://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP, accessed November 2, 2020.

U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, available at https://www.fws.gov/wetlands/data/mapper.html, accessed November 2, 2020.

## 5. CULTURAL RESOURCES

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Historical resources include objects, buildings, structures, sites, areas, places, records, or manuscripts that are historically or archaeologically significant. Buildings and structures 45 years old or older are typically evaluated for historical significance by cultural resources investigations. Based on the DRP GIS-NET database, no historic resources are within the FFTOD Specific Plan Area. However, according to the FFCP, the majority of structures in Florence-Firestone were built during the 1920s–1940s and have the potential to be considered historic resources. Additionally, according to the California Office of Historic Preservation, Built Environment Resources Directory, a total of 27 previously recorded built environment resources were identified within the focused change area (refer to Figure 8 above). Therefore, the Project may cause a substantial adverse change in the significance of a historical resource. The impact is considered potentially significant and a Cultural Resources Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. The FFTOD Specific Plan Area is already heavily urbanized and ground surfaces have been heavily disturbed due to previous development. Therefore, the likelihood of the discovery of archaeological resources is minimal. However, construction of future development in the FFTOD Specific Plan Area could require deeper excavations than previously needed for existing and past developments. Therefore, construction of new developments could cause a substantial adverse change in the significance of an archaeological resource. The impact is considered potentially significant and a Cultural Resources Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Florence-Firestone community is heavily urbanized with residential and industrial land uses. There are no unique geologic features within the FFTOD Specific Plan Area. However, as discussed in Response 5b above, construction of future development pursuant to implementation of the FFTOD Specific Plan could require deeper excavations than previously needed for existing and past developments. Therefore, construction of new developments could directly or indirectly destroy a unique paleontological resource. The impact is considered potentially significant and a Cultural

Resources Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **d) Disturb any human remains, including those interred outside of dedicated cemeteries?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** No known site within the FFTOD Specific Plan Area has been used for human burial purposes, including cemeteries. Therefore, it is unlikely that human remains would be encountered during construction activities related to future development pursuant to implementation of the FFTOD Specific Plan. However, previously unknown buried human remains could be inadvertently disturbed during construction activities. The impact is considered potentially significant and will be further analyzed in the EIR.

**References**

California Office of Historic Preservation, Built Environment Resources Directory, Resources by County, available at https://ohp.parks.ca.gov/?page_id=30338, accessed February 22, 2021.

Los Angeles County Department of Regional Planning, GIS-NET, available at https://planning.lacounty.gov/gisnet, accessed February 22, 2021.

Los Angeles County Department of Regional Planning, Florence-Firestone Community Plan, adopted September 2019, available at http://planning.lacounty.gov/assets/upl/project/ffcp_final_20190903.pdf, accessed November 2, 2020.

## 6. ENERGY

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **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?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Redevelopment and infill development resulting from implementation of the FFTOD Specific Plan would require approvals pursuant to Title 31 of the LA County Code, known as the Green Building Standards, which sets guidelines for planning and design, energy efficiency, water conservation, recycling, and air quality. Additionally, the Project would be consistent with policies set forth in the FFCP that promote energy efficiency and green building for new developments. Nonetheless, an Energy Technical Report will be prepared to evaluate the impacts of implementation of the FFTOD Specific Plan related to energy resources. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan would propose land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations). Development projects resulting from implementation of the FFTOD Specific Plan would comply with State of California and LA County regulations related to renewable energy and energy efficiency. These regulations would include the State's Renewable Portfolio Standard; Appliance Efficiency Regulations; Title 24, California Code of Regulations, Part 6: Energy Efficiency Standards for Buildings; and Title 31, Green Building Standards, LA County Code, all of which address energy efficiency guidelines for developments. Nonetheless, an Energy Technical Report will be prepared to evaluate the FFTOD Specific Plan's consistency with state or local plans for renewable energy or energy efficiency. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

## 7. GEOLOGY AND SOILS

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** The Los Angeles Basin contains both active and potentially active faults and is considered a region of high seismic activity. The California Earthquake Hazards Zone Application Map issued by the California Geological Survey shows no active faults or Alquist-Priolo Earthquake Fault Zones within the FFTOD Specific Plan Area. The closest known fault is the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area and the Upper Elysian Park Fault approximately 5.2 miles north of the FFTOD Specific Plan Area. Ground rupture is considered more likely along active faults. Due to the distance between the FFTOD Specific Plan Area and the nearest active fault, future development pursuant to implementation of the FFTOD Specific Plan is unlikely to experience ground rupture. The impact would be less than significant. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **ii) Strong seismic ground shaking?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** Buildout of the FFTOD Specific Plan would increase the numbers of residential units, non-residential structures, residents, and workers in the FFTOD Specific Plan Area. As discussed in Response 7a(i), the closest active faults to the FFTOD Specific Plan Area are the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area and the Upper Elysian Park Fault approximately 5.2 miles north of the FFTOD Specific Plan Area. Even though future development pursuant to implementation of the FFTOD Specific Plan would not likely experience ground rupture, strong seismic ground shaking would likely occur within the lifetime of the FFTOD Specific Plan. Although strong seismic shaking is a risk throughout Southern California, the FFTOD Specific Plan Area is not at greater risk of seismic activity or impacts than other areas. Additionally, the California Building Code regulates development to reduce hazards from earthquakes and other geologic hazards. The California Building Code contains building design and construction requirements that are intended to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. Additionally, future development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the provisions of the California Building Code, which are imposed on development projects by LA County during the building plan check and development review process. Compliance with the requirements of the California Building Code would ensure that impacts related to the hazards associated with strong seismic ground shaking would be less than significant. This issue will not be analyzed further in the EIR.

**iii) Seismic-related ground failure, including liquefaction and lateral spreading?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** Liquefaction occurs when loosely packed, water saturated sediments at or near the ground surface lose their strength in response to strong or extended periods of seismic shaking. Pressure increases in the soil pores temporarily alter the soil state from solid to liquid. Liquefied sediments lose strength, in turn causing the failure of adjacent infrastructure, including buildings. Lateral spreading is a type of liquefaction-induced ground failure on mildly sloping ground and occurs when ground shaking causes the side-to-side movement of soil.

According to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is within the Inglewood and South Gate Liquefaction Zone. The FFTOD Specific Plan Area has a flat topography and is not within or near a landslide zone. Nonetheless, future development projects considered for approval pursuant to implementation of the FFTOD Specific Plan could subject persons or structures to potentially significant hazards arising from liquefaction. Thus, the impact related to liquefaction and lateral spreading is considered potentially significant and will be further analyzed in the EIR.

**iv) Landslides?** ☐ ☐ ☐ ☒

**No Impact.** The FFTOD Specific Plan Area has a flat topography. Additionally, according to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is not within or near a landslide zone. Therefore, no impact would occur. This issue will not be analyzed further in the EIR.

**b) Result in substantial soil erosion or the loss of topsoil?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The FFTOD Specific Plan Area is flat and future development associated with the FFTOD Specific Plan would be implemented in an area that is already developed for urban land uses. However, construction activities associated with the FFTOD Specific Plan, such as roadway, sidewalk, bicycle path, and building development components, would require excavation, grading, and other soil-disturbing activities, which have the potential to result in substantial soil erosion or the loss of topsoil. The impact is considered potentially significant and will be further analyzed in the EIR.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** As described in Response 7a(iii), the FFTOD Specific Plan Area is within the Inglewood and South Gate Liquefaction Zones. Future development pursuant to implementation of the FFTOD Specific Plan may be located on soil that is unstable. Therefore, the impact related to being located on an unstable geologic unit or soils is considered potentially significant and will be further analyzed in the EIR.

**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?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** Expansive soils are clay-based soils that tend to expand or increase in volume as they absorb water. Future development pursuant to implementation of the FFTOD Specific Plan may be located on expansive soils. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** The FFTOD Specific Plan Area is served by a public sanitary sewer system. Future developments pursuant to implementation of the FFTOD Specific Plan would include connections to sanitary sewers and would not use onsite wastewater treatment systems. No impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** The FFTOD Specific Plan Area has a flat topography and is not subject to the Hillside Management Area Ordinance. No impact would occur. This issue will not be analyzed further in the EIR.

**References**

California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application, available at https://www.conservation.ca.gov/cgs/geohazards/eq-zapp, accessed November 2, 2020.

U.S. Geological Survey, Earthquake Hazards Program, available at https://earthquake.usgs.gov/, accessed November 16, 2020.

## 8. GREENHOUSE GAS EMISSIONS

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Although the Project would provide opportunities to promote active transportation and reduce vehicle miles traveled, construction and operation of future development permitted by the FFTOD Specific Plan would generate GHG emissions, both directly and indirectly, in the areas of transportation, energy use, water use, and waste disposal. The impact is considered potentially significant and a Greenhouse Gases Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The California Air Resources Board's Climate Change Scoping Plan contains the main strategies California will implement to achieve required GHG reductions set by Assembly Bill 32, which requires California to reduce its GHG emissions to 1990 levels by 2020. The Sustainable Communities and Climate Protection Act (Senate Bill 375) coordinates land use planning, regional transportation plans, and funding priorities to reduce GHG emissions from passenger vehicles. The Southern California Association of Government's (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy seeks to reduce per capita transportation emissions for the SCAG region. The FFTOD Specific Plan may generate GHG emissions from construction and operation of future development. Because GHG emissions generated by buildout of the FFTOD Specific Plan may be substantial, these impacts may conflict with GHG strategies and targets of applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, including the aforementioned. The impact is considered potentially significant and a Greenhouse Gases Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

## 9. HAZARDS AND HAZARDOUS MATERIALS

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Future development pursuant to implementation of the FFTOD Specific Plan would include construction-related activities and the operation of new or different land uses, which may involve the routine use of substances classified as hazardous materials including fuels, pesticides, paints, and other materials. While the Project would comply with existing federal, state, and local regulations regarding the use, storage, transport, and disposal of hazardous materials, the impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Project would propose land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations). Implementation of the land use changes may include development that could result in the release of unknown contaminants from the soil and/or groundwater during construction into the environment. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan Area includes a total of nine elementary schools, five middle schools, three high schools, and two private schools. In addition, the FFTOD Specific Plan Area has the Florence Medical Center, Roosevelt Park Senior Center, and Florence-Firestone Childcare Center, all of which are considered sensitive land uses. The Project would comply with existing federal, state, and local regulations regarding the use, storage, transport, and disposal of hazardous materials. In addition, any future development would be subject to the standards of the LA County Green Zones Program (when adopted), which seeks to enhance public health and land use compatibility in the unincorporated communities that bear a disproportionate pollution burden. Nonetheless, future development pursuant to implementation of the FFTOD Specific Plan may involve the routine use of substances classified as hazardous materials and/or result in the release of unknown contaminants/hazardous materials during construction within one-quarter mile of sensitive land uses. Thus, the impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to** | ☒ | ☐ | ☐ | ☐ |

**Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Potentially Significant Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses, which may have a history of hazardous material sites. The Geotracker Database, managed by the State Water Resources Control Board, and the EnviroStor database, managed by the California Department of Toxic Substances Control, track sites that may impact water quality and hazardous waste facilities, respectively. Future development pursuant to implementation of the FFTOD Specific Plan may be located on or near a hazardous materials site. The impact is considered potentially significant and will be further analyzed in the EIR.

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

**No Impact.** According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not within an airport land use plan or within 2 miles of a public or public use airport. The nearest public use airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the FFCP area, and no impact would occur. This issue will not be analyzed further in the EIR.

**f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The Los Angeles County Office of Emergency Management maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. Future development pursuant to implementation of the FFTOD Specific Plan would require construction, which may result in construction-related traffic that could temporarily impede emergency access to and within the FFTOD Specific Plan Area. The impact is considered potentially significant and will be further analyzed in the EIR.

**g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:**

**i) within a high fire hazard area with inadequate access?** ☐ ☐ ☐ ☒

**No Impact.** According to the Fire Hazard Severity Zones Map prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the FFTOD Specific Plan Area is not within or near a Very High Fire Hazard Severity Zone. Therefore, there would be no impact to people or structures within a high fire hazard area with inadequate access. This issue will not be analyzed further in the EIR.

**ii) within an area with inadequate water and pressure to meet fire flow standards?** ☐ ☐ ☒ ☐

**Less Than Significant Impact.** As described in Response 9g(i), the FFTOD Specific Plan Area is not within a Very High Fire Hazard Severity Zone. Furthermore, the Florence-Firestone community is served by Fire Station 16 at 8010 Compton Avenue. The Los Angeles County Fire Department requires adequate water and pressure to service an area, and adequate water and pressure to meet fire flow standards would be continued with buildout of the FFTOD Specific Plan. Therefore, the impact would be less than significant. This issue will not be analyzed further in the EIR.

**iii) within proximity to land uses that have the potential for dangerous fire hazard?** ☐ ☐ ☒ ☐

**Less Than Significant Impact.** The FFTOD Specific Plan Area is presently heavily urbanized with industrial and commercial land uses that inherently have some fire hazard potential. However, these existing uses primarily consist of retail store, shopping center, and auto service commercial uses with nearby residential uses that are typical of an urban setting and would not be considered a dangerous fire hazard. Additionally, the proposed FFTOD Specific Plan Zoning Categories would consider uses suitable for employment near residential areas as well as the creation of transitions between industrial uses that would serve to limit exposure of people to certain land uses. Further, as previously described in Response 9g(i), the FFTOD Specific Plan Area is not within a Very High Fire Hazard Severity Zone. Therefore, a less than significant impact would occur to people or structures within proximity to land uses that have the potential for fire hazard. This issue will not be analyzed further in the EIR.

**h) Does the proposed use constitute a potentially dangerous fire hazard?** ☐ ☐ ☒ ☐

**Less Than Significant Impact.** The FFTOD Specific Plan would address land use and zoning changes, and provide recommendations for mobility improvements that support housing density and employment in proximity to the Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. It would include light industrial and commercial land uses that may use or manufacture products/materials that could present some fire hazard. However, the FFTOD Specific Plan Area is already heavily urbanized with industrial and commercial land uses that also inherently have some fire hazard potential. The majority of the existing industrial uses within the FFTOD Specific Plan Area is light manufacturing with a small amount of heavy manufacturing, with industrial uses primarily clustered along industrial corridors with auto related uses. The proposed Industrial Flex Zoning Category would maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for employment near residential areas. The Mixed-Use Zoning Categories (MU-1, MU-2, MU-3, and MU-T) would create an employment-focused, high-intensity mixed-use transit district that allows for the creation of transitions between industrial uses. The Industrial Flex Zoning Category would allow for the creation of transitions between employment uses and residential to encourage less noxious uses and focus on light industrial, neighborhood-serving commercial and office uses. Therefore, future development within these zoning categories would not constitute a potentially dangerous fire hazard or increase the potential for dangerous fire hazards as they would consist of typical urban land uses, similar to existing conditions. The impact would be less than significant. This issue will not be analyzed further in the EIR.

**References**

County of Los Angeles, Open Data, Fire Hazard Severity Zones, available at https://data.lacounty.gov/dataset/Fire-Hazard-Severity-Zones/jwg2-9k5y, accessed November 2, 2020.

Department of Toxic Substances Control, EnviroStor, available at https://www.envirostor.dtsc.ca.gov/public, accessed November 2, 2020.

Los Angeles County Office of Emergency Management, Los Angeles County Airport Land Use Plan, available at https://planning.lacounty.gov/assets/upl/data/pd_alup.pdf, accessed November 2, 2020.

State Water Resources Control Board, GeoTracker, available at https://geotracker.waterboards.ca.gov/, accessed November 2, 2020.

## 10. HYDROLOGY AND WATER QUALITY

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Clean Water Act governs water quality and the National Pollutant Discharge Elimination System (NPDES) requires any facility discharging pollutants to obtain a permit; compliance is required for all projects within LA County. Redevelopment and infill development of parcels resulting from implementation of the FFTOD Specific Plan have the potential to disturb soil or release hazardous materials that could degrade surface or groundwater quality. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The California Department of Water Resources' Sustainable Groundwater Management Program Data Viewer indicates that the FFTOD Specific Plan Area is in the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin. According to the Los Angeles County Public Works' Spreading Grounds Facilities Map, which identifies water conservation facilities, there are no groundwater recharge basins within or near the FFTOD Specific Plan Area and the FFTOD Specific Plan Area is not used for intentional groundwater recharge. The Golden State Water Company provides water to the Central Basin West service area which includes the FFTOD Specific Plan Area. Water supplied to the Central Basin West service area is composed of groundwater pumped from the Central Groundwater Basin and water from the Colorado River Aqueduct and the State Water Project that is imported and distributed by the Metropolitan Water District of Southern California. The Central Groundwater Basin is bound by the La Brea Uplift to the north; the Elysian, Repetto, Merced, and Puente Hills to the east; the Orange County Groundwater Basin to the southeast; and the Newport-Inglewood Fault Zone to the west. Implementation of the FFTOD Specific Plan would include future development that would increase housing and population, thereby increasing water demand. Therefore, the impact on groundwater supplies is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; 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 substantial erosion or siltation on- or off-site?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FEMA Flood Map Service Center, managed by the Department of Homeland Security, indicates that the FFTOD Specific Plan Area is within an area of minimal flood hazard. In addition, DRP's GIS-NET Public Map shows no streams or rivers within the FFTOD Specific Plan Area. The closest stream or river is Compton Creek, approximately 0.5 mile from the southern boundary of the FFTOD Specific Plan Area. Redevelopment and infill development of parcels resulting from implementation of the FFTOD Specific Plan would occur in an area that is already primarily paved and developed for urban use. During operation of these future developments, runoff would continue to be directed into storm drains. The existing area is primarily paved, and new impervious surfaces would be nominal. However, construction activities, including excavation, for future development may result in erosion of soil. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** As previously discussed, the FFTOD Specific Plan would include redevelopment and infill development of existing urban land uses in the FFTOD Specific Plan Area. Future development pursuant to implementation of the FFTOD Specific Plan would continue to direct runoff into storm drains and is not likely to substantially increase the rate, amount, or depth of surface runoff that would result in flooding as the existing area is primarily paved and new impervious surfaces would be nominal. However, construction activities, including excavation, for future development may alter drainage patterns temporarily and new sources of runoff may occur. Operation of new development may also contribute to new sources of surface runoff. The impact related to an increase in runoff and the capacity of drainage systems is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **(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?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** As previously discussed, the FFTOD Specific Plan would include redevelopment and infill development of existing urban land uses in the FFTOD Specific Plan Area. Future development pursuant to implementation of the FFTOD Specific Plan would maintain existing drainage patterns and is not likely to substantially create runoff water that would exceed drainage capacity as the existing area is primarily paved and new impervious surfaces would be nominal. However, construction of future development may alter drainage patterns temporarily and new sources of runoff may occur. Operation of new development may also contribute to new sources of runoff. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** As previously discussed in Response 10c(i), the FFTOD Specific Plan Area is designated as an area of minimal flood hazard. Therefore, future development pursuant to implementation of the FFTOD Specific Plan would not impede or redirect flood flows and would not expose existing housing to flood hazards. The impact would be less than significant. This issue will not be analyzed further in the EIR.

**d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?** ☐ ☐ ☒ ☐

**Less Than Significant Impact.** As previously discussed in Response 10c(i), the FFTOD Specific Plan Area is designated as an area of minimal flood hazard. Future development pursuant to implementation of the FFTOD Specific Plan would not place structures in the federal 100-year flood hazard or LA County Capital floodplain areas. The impact would be less than significant. This issue will not be analyzed further in the EIR.

**e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?** ☐ ☐ ☐ ☒

**No Impact.** The Los Angeles County Low Impact Development (LID) Ordinance incorporates design strategies using naturalistic, on-site Best Management Practices for new development to reduce impacts to stormwater quality and quantity. All designated, non-designated, street and road construction, and single-family hillside home projects within the Unincorporated Areas of LA County, including in the Florence-Firestone community, are required to comply with the LID Standards Manual. A comprehensive LID plan and analysis demonstrating compliance with the LID Standards Manual must be submitted for review and approval by the Director of Public Works. Future redevelopment and infill development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the ordinance as applicable. No impact would occur. This issue will not be analyzed further in the EIR.

**f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?** ☐ ☐ ☐ ☒

**No Impact.** The FFTOD Specific Plan Area is served by existing public sanitary sewers. No wastewater treatment systems are proposed within the FFTOD Specific Plan Area. Additionally, the FFTOD Specific Plan Area does not contain geological limitations or surface water such as rivers and lakes. Therefore, no impact related to use of wastewater treatment systems in these areas would occur. This issue will not be analyzed further in the EIR.

**g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?** ☐ ☐ ☐ ☒

**No Impact.** As previously discussed, the FFTOD Specific Plan Area is designated as an area of minimal flood hazard. The Los Angeles County Tsunami Inundation Maps created by the California Department of Conservation show that the FFTOD Specific Plan Area is not within a tsunami inundation zone. In addition, the Dam Locations Map created by the Los Angeles County Public Works show no dams or reservoirs within or near the area, indicating that the FFTOD Specific Plan Area is not within a seiche zone. As the FFTOD Specific Plan Area is not within any of the aforementioned zones, no impact related to the risk of release of pollutants due to inundation would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The California Department of Water Resources identifies groundwater basins in California that are subject to the Sustainable Groundwater Management Act, which allows local agencies or counties to develop a Groundwater Sustainability Plan (GSP). The local agency that manages LA County's GSP is the Santa Monica Basin Groundwater Sustainability Agency. As the FFTOD Specific Plan Area falls within this jurisdiction, future development pursuant to implementation of the FFTOD Specific Plan would be subject to the local water management plan. Redevelopment and infill development of parcels has the potential to disturb soil or release hazardous materials that could conflict with the local water quality control plan, or otherwise conflict with the GSP. The impact is considered potentially significant and will be further analyzed in the EIR.

**References**


California Department of Conservation, Los Angeles County Tsunami Inundation Maps, available at https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles, accessed November 12, 2020.

California Department of Water Resources, Sustainable Groundwater Management Program Data Viewer, available at https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels, accessed November 2, 2020.

City of Santa Monica, Santa Monica Basin Groundwater Sustainability Agency, available at https://www.santamonica.gov/gsp, accessed November 12, 2020.

Department of Homeland Security, FEMA Flood Map Service Center, available at https://msc.fema.gov/portal/search#searchresultsanchor, accessed November 12, 2020.

Golden State Water Company, Florence-Graham Water System Consumer Confidence Report on Water Quality for 2019, available at https://www.gswater.com/sites/main/files/file-attachments/water-quality-2020-florence-graham.pdf?1590713678, accessed November 23, 2020.

Los Angeles County Public Works, Dam Locations Map, available at https://dpw.lacounty.gov/wrd/reservoir/Reservoirs.pdf, accessed November 12, 2020.

Los Angeles County Public Works, Low Impact Development Standards Manual, available at https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf, accessed November 2, 2020.

Los Angeles County Public Works, Spreading Ground Facilities Map, available at http://dpw.lacounty.gov/wrd/spreadingground/SpreadingGroundMap.pdf, accessed November 2, 2020.

## 11. LAND USE AND PLANNING

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Physically divide an established community?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** The FFTOD Specific Plan Area is heavily urbanized with residential, commercial, and industrial uses. Implementation of the FFTOD Specific Plan would include land use and zoning changes, and provide recommendations for mobility improvements to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations). These improvements would make it easier for bicyclists and pedestrians to access these stations and enhance commercial development focused on serving the local community. Redevelopment and infill development of parcels within the FFTOD Specific Plan Area would result in additional housing units and promote multi-modal connectivity and increase access to transit within the community. Therefore, implementation of the Project would not physically divide an established community. A less than significant impact would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Project, a TOD Specific Plan, would result in changes to industrial, mixed-use, commercial, and residential land uses and zoning categories focused in the 0.25 mile TOD area around each of the three Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations). The FFTOD Specific Plan would identify sites that have the potential for redevelopment or infill development and proposes to rezone land uses of specific parcels within the area to provide for the TOD consistent with the LA County TOD Program. The Project will also rezone RHNA sites consistent with the proposed Housing Element update. The FFTOD Specific Plan would result in increases in development intensity and changes in land uses that would require amendments to the LA County Zoning Code (Title 22), the General Plan, and the FFCP. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** DRP defines Hillside Management Areas (HMAs) as areas with 25 percent or greater natural slopes, and Significant Ecological Areas (SEAs) as areas with irreplaceable biological resources. According to DRP's GIS-NET Public database, no HMAs or SEAs are within or near the FFTOD Specific Plan Area. Therefore, the Project would not conflict with the goals and policies of the General Plan related to HMAs or SEAs and no impact would occur. This issue will not be analyzed further in the EIR.

**References**

Los Angeles County Department of Regional Planning, GIS-NET Public, Planning & Zoning Information for Unincorporated L.A. County, available at

https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed November 2, 2020.

Los Angeles County Department of Regional Planning, Hillside Management Areas (HMA) Ordinance, available at https://planning.lacounty.gov/hma, accessed November 12, 2020.

Los Angeles County Department of Regional Planning, Significant Ecological Areas Program, available at https://planning.lacounty.gov/site/sea/maps/, accessed November 12, 2020.

## 12. MINERAL RESOURCES

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** According to the Generalized Mineral Land Classification Map of Los Angeles County – South Half issued by the California Geological Survey, the majority of the FFTOD Specific Plan Area is designated as Mineral Resource Zone (MRZ) 1, which indicates that no significant mineral deposits are present, or that there is little likelihood for their presence. The northern portion of the FFTOD Specific Plan Area, from Slauson Avenue until approximately E 62nd Street, is designated MRZ-2, which indicates that the area contains significant mineral deposits or high likelihood exists for their presence. However, that portion of the FFTOD Specific Plan Area is currently heavily urbanized with residential and industrial uses. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that are incompatible with mining. In addition, no active mines are within or near the FFTOD Specific Plan Area. Therefore, a less than significant impact would occur related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **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?** | ☐ | ☐ | ☒ | ☐ |

**Less Than Significant Impact.** The General Plan does not specify areas of significant availability of a locally important mineral resource recovery site within the FFTOD Specific Plan Area. The FFCP also does not specify such mineral resource recovery areas. Although a portion of the FFTOD Specific Plan Area is designated as MRZ-2, as discussed above, the land is already built out with urban land uses incompatible with mining. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that would also be incompatible with mining. Therefore, the Project would not result in the substantial 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 impact would be less than significant. This issue will not be analyzed further in the EIR.

### References

State of California The Resources Agency Department of Conservation, Generalized Mineral Land Classification Map of Los Angeles County – South Half, accessed November 2, 2020.

## 13. NOISE

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project result in:** | | | | |
| **a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Implementation of the FFTOD Specific Plan would potentially increase noise levels in the community due to the construction and operation of future development. Possible sources of noise would include construction activities, stationary sources (e.g., mechanical systems), and mobile sources (e.g., increased passenger and commercial/industrial vehicular traffic). Therefore, the Project may result in the 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 General Plan or noise ordinance. The impact is potentially significant, and a Noise and Vibration Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **b) Generation of excessive groundborne vibration or groundborne noise levels?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Implementation of the FFTOD Specific Plan would include construction and demolition activities related to future development, which have the potential to cause temporary generation of excessive groundborne vibration or noise levels in the FFTOD Specific Plan Area. Additionally, the operation of certain land uses (e.g., industrial) could also result in the generation of groundborne vibration and noise. The increase in groundborne vibration or noise has the potential to impact vibration-sensitive land uses within or surrounding the FFTOD Specific Plan Area. The impact is potentially significant, and a Noise and Vibration Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

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

**No Impact.** According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not within an airport land use plan or a private airstrip, or within 2 miles of a public airport or public use airport. The closest airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. The Project would not expose people residing or working in the

FFTOD Specific Plan Area to excessive noise levels from aircraft. No impact would occur. This issue will not be analyzed further in the EIR.

## 14. POPULATION AND HOUSING

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **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)?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Florence-Firestone community is primarily residential, with approximately 63 percent of the land within the area designated for residential use. The FFTOD Specific Plan would include residential and non-residential land use changes that could allow for an increase in the population density of the area. The residential zone changes would maintain existing residential neighborhoods while supporting a broader range of housing types, as well as encouraging medium-density and high-density residential near transit. Therefore, the Project has the potential to induce direct or indirect substantial unplanned population growth in the area. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan would address land use and zoning changes and provide recommendations for mobility improvements that support housing density and employment in proximity to the Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. The FFTOD Specific Plan would provide for redevelopment and infill development that would include a mix of industrial, mixed-use, commercial, and residential uses. As discussed, implementation of the FFTOD Specific Plan would provide residential zone changes that would maintain existing residential neighborhoods while supporting a broader range of housing types, as well as encouraging medium-density and high-density residential near transit. However, future development pursuant to implementation of the proposed FFTOD Specific Plan has the potential to result in displacement of existing people or housing. The impact is considered potentially significant and will be further analyzed in the EIR.

## 15. PUBLIC SERVICES

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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:** | | | | |
| **Fire protection?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Florence-Firestone community is served by the Los Angeles County Fire Department, Fire Station 16, at 8010 Compton Avenue. The FFTOD Specific Plan would include industrial, mixed-use, commercial, and residential land use changes that could allow for an increase in the population density of the area, thus increasing demand for fire protection services. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **Sheriff protection?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Florence-Firestone community is served by the Los Angeles County Sheriff's Department, Century Sheriff's Station, at 11703 South Alameda Street. The FFTOD Specific Plan would include industrial, mixed-use, commercial, and residential land use changes that could allow for an increase in the population density of the area, thus increasing demand for sheriff protection services. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **Schools?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** As previously mentioned in Response 9c, nine elementary schools, five middle schools, three high schools, and two private schools are within the FFTOD Specific Plan Area. The FFTOD Specific Plan would include industrial, mixed-use, commercial, and residential land use changes that could allow for an increase in the population density of the area, thus potentially increasing the number of families and youth that would increase demand for schools. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **Parks?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan Area contains five parks, totaling approximately 70 acres of park space. The Project would propose land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations). However, the ratio of park space to number of residents in the Florence-Firestone community is already below LA County's standards (1 acre

per 1000 residents compared to the goal of 4 acres per 1,000 residents). Thus, an increase in population density resulting from implementation of the Project has the potential to increase the demand for parks. The impact is considered potentially significant and will be further analyzed in the EIR.

**Libraries?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** There are two libraries within the FFTOD Specific Plan Area: the Florence Library (7600 Graham Avenue) and the Graham Library (1900 East Firestone Boulevard). The FFTOD Specific Plan would include industrial, mixed-use, commercial, and residential land use changes that could allow for an increase in the population density of the area, thus potentially increasing the demand for library services. The impact is considered potentially significant and will be further analyzed in the EIR.

**Other public facilities?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** There are several other public facilities within the FFTOD Specific Plan Area, including a social services center, childcare center, senior center, community center, and others. The FFTOD Specific Plan would include industrial, mixed-use, commercial, and residential land use changes that could allow for an increase in the population density of the area, thus potentially increasing the demand for other public facilities. The impact is considered potentially significant and will be further analyzed in the EIR.

## 16. RECREATION

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan Area contains five parks: Ted Watkins Memorial Park, Franklin D. Roosevelt Park, Colonel Leon H. Washington Park, Mary MacLeod Bethune Park, and El Parque Nuestro. El Parque Nuestro, built in 2010, is the community's newest park and the only pocket park. Goals and policies from the FFCP address the need for more neighborhood parks and pocket parks that are easily accessible from residential areas. In addition, according to the FFCP, all five of these parks need improvements and/or are in poor condition. The FFTOD Specific Plan would include land use changes that could allow for an increase in the population density of the area, which may increase the use of these parks such that further deterioration of the park facilities could occur. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan would propose land use and zoning changes and provide recommendations for mobility improvements (including to pedestrian and bicycle infrastructure) to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations). Goal PR-4, Policy PR-4.3 from the FFCP addresses the need for parks to be integrated into a community-wide greenway network, linking to larger open space networks, such as the Los Angeles and Rio Hondo River trails. As discussed in Response 16a, the five parks within the FFTOD Specific Plan Area need improvements and/or are in poor condition. Additionally, the FFTOD Specific Plan would include land use changes that could allow for an increase in the population density of the area, which may increase the use of these parks or require the construction or expansion of recreational facilities resulting in an adverse physical effect on the environment. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Would the project interfere with regional trail connectivity?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** According to the Los Angeles County Department of Parks and Recreation's Trails Map, there are no LA County trails within the FFTOD Specific Plan Area. The closest riding, hiking, or multi-use trail is the Rio Hondo River Trail, which is approximately 5 miles east of the FFTOD Specific Plan Area. In addition, the FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses with little open space. The Project would not interfere with regional open space connectivity, and no impacts would occur. This issue will not be analyzed further in the EIR.

## 17. TRANSPORTATION

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Project is a TOD Specific Plan. The Project proposes land use and zoning changes, and recommendations for mobility improvements to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations) to make it easier for bicyclists and pedestrians to access the stations. Proposed improvements have the potential to impact the performance of roadways in and surrounding the FFTOD Specific Plan Area. These changes may conflict with an applicable program, plan, ordinance, or policy addressing the circulation system. The impact is considered potentially significant and a Transportation Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** CEQA Guidelines section 15064.3, subdivision (b) states that projects within 0.5 mile of either an existing major transit stop or projects that decrease vehicle miles traveled compared to existing conditions should be presumed to have a less than significant transportation impact. The Project is a TOD Specific Plan. The TOD is applicable to an area within a 0.5-mile radius of each of the three Metro A Line Stations: the Slauson, Florence, and Firestone Stations. The Project proposes land use and zoning changes, and recommendations for mobility improvements to support transit-oriented development in proximity to the Metro A Line Station areas (i.e., Slauson, Florence, and Firestone Stations). The Project would provide more opportunities for housing, enable transit-serving development, promote active transportation, improve access to transit, reduce vehicles miles traveled by cars, and streamline the environmental review of future development projects. However, the Project extends beyond the 0.5-mile TOD radius and future development outside of the TOD area. The impact is considered potentially significant and a Transportation Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan would incorporate changes in sidewalk design and streetscape zones, which may include sidewalk widening, landscaping, and building setbacks. Proposed roadway changes and improvements as part of the FFTOD Specific Plan would be required to comply with applicable Standard Plans issued by the Los Angeles County Public Works. In addition, the proposed uses within the FFTOD Specific Plan would be compatible with the surrounding mixed uses in the urban environment. Nonetheless, a Transportation Technical Report will be prepared for the Project. The findings

and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

**d) Result in inadequate emergency access?** ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The proposed FFTOD Specific Plan would include roadway changes and improvements, which would require the presence of construction equipment and materials adjacent to roadways. Future development pursuant to implementation of the FFTOD Specific Plan would require construction, which may result in construction traffic that could temporarily impede emergency access to and within the FFTOD Specific Plan Area. The impact is considered potentially significant and a Transportation Technical Report will be prepared for the Project. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

## 18. TRIBAL CULTURAL RESOURCES

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **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 § 5020.1(k), or** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. A Cultural Resources Technical Report will be prepared for the Project, which will identify any significant tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources and evaluate the sensitivity of the FFTOD Specific Plan Area for tribal cultural resources. The findings and conclusions of the report will be described in the EIR, and mitigation measures will be identified as necessary.

| | | | | |
|---|---|---|---|---|
| **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 Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Pursuant to Assembly Bill 52, 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 the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area. As the lead agency, DRP will consult with California Native American tribes that request consultation in association with the Project. If any tribal cultural resources are identified during the Assembly Bill 52 process, the impact may be considered potentially significant. Therefore, this issue will be further analyzed in the EIR.

## 19. UTILITIES AND SERVICE SYSTEMS

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **Would the project:** | | | | |
| **a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Implementation of the FFTOD Specific Plan and the resulting future development could result in an increase in population and a higher demand for water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** As discussed in Response 19a, implementation of the FFTOD Specific Plan and the resulting future development could result in an increase in population and a higher demand for water for the foreseeable future. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) 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?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Los Angeles County Sanitation District provides wastewater treatment for the FFTOD Specific Plan Area. As previously discussed, implementation of the FFTOD Specific Plan and the resulting future development could result in an increase in population and a higher demand for wastewater treatment and services. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **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?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Waste management services within the FFTOD Specific Plan Area are provided by the Florence/Firestone/Willowbrook Garbage Disposal District administered by LA County and private waste haulers. According to the Los Angeles County Public Works 2018 Countywide Integrated Waste

Management Plan, to meet disposal capacity needs for LA County to 2033, jurisdictions in LA County must further increase their waste reduction and diversion efforts, among other strategies. As previously discussed, implementation of the FFTOD Specific Plan and the resulting future development could result in an increase in population, which would translate to an increase in the generation of solid waste. The impact is considered potentially significant and will be further analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Future developments pursuant to implementation of the FFTOD Specific Plan would be required to comply with federal, state, and local statutes and regulations regarding solid waste, including LA County's Construction and Demolition Debris Recycling and Reuse Ordinance and the Roadmap to Sustainable Waste Management Future (Roadmap). The Roadmap establishes a goal to divert 80 percent of solid waste generated in unincorporated areas of LA County, including the FFTOD Specific Plan Area, by 2025, 90 percent by 2035, and 95 percent or more by 2045. However, as previously discussed, implementation of the FFTOD Specific Plan and the resulting future development could result in an increase in population and associated generation of solid waste, which could conflict with solid waste reduction statutes. The impact is considered potentially significant and will be further analyzed in the EIR.

**References**

Los Angeles County Public Works, 2019, Countywide Integrated Waste Management Plan 2018 Annual Report, accessed February 22, 2020.

## 20. WILDFIRE

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **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 Impact.** According to the California Fire Hazard Severity Zone Map prepared by CAL FIRE, the FFTOD Specific Plan Area is not within or near a Very High Fire Hazard Severity Zone within a Local Responsibility Area or a State Responsibility Area. Therefore, no impact related to high fire hazard severity zones would occur. This issue will not be analyzed further in the EIR.

| | | | | |
|---|---|---|---|---|
| **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 Impact.** See Response 20a.

| | | | | |
|---|---|---|---|---|
| **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 Impact.** See Response 20a.

| | | | | |
|---|---|---|---|---|
| **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 Impact.** See Response 20a.

| | | | | |
|---|---|---|---|---|
| **e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?** | ☐ | ☐ | ☐ | ☒ |

**No Impact.** See Response 20a.

**Reference**

California Department of Forestry and Fire Protection (CAL FIRE), California Fire Hazard Severity Zone Viewer, available at https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, accessed November 12, 2020.

## 21. MANDATORY FINDINGS OF SIGNIFICANCE

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** Potentially significant impacts are identified in this Initial Study related to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. The extent of these impacts will be evaluated in the EIR.

| | | | | |
|---|---|---|---|---|
| **b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan may have impacts that are cumulatively considerable when considered in conjunction with other current projects and the effects of probable future projects. The EIR will address the potential cumulative impacts for each of the environmental topics analyzed in the EIR.

| | | | | |
|---|---|---|---|---|
| **c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The FFTOD Specific Plan may have environmental effects that may substantially adversely affect human beings, either directly or indirectly. The extent of these impacts will be evaluated in the EIR.

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
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*Making Conservation a California Way of Life.*

March 26, 2021

Norman Ornelas, Jr., Regional Planner
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, California 90012

RE: Florence-Firestone Transit-Oriented District Specific Plan – Notice of Preparation (NOP)
SCH# 2021030300
GTS# 07-LA-2021-03522
Vic. LA-Multiple

Dear Norman Ornelas,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Florence-Firestone Transit-Oriented District (FFTOD) Specific Plan will implement the LA County General Plan 2035 TOD Program. TODs are defined in the General Plan as the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, three Metro A Line stations are present: the Slauson, Florence, and Firestone Stations. The goals of the FFTOD Specific Plan are to create transit-accessible housing development; increase job-generating uses and economic activity; develop a safe and attractive transportation network; increase walking, bicycling, and transit ridership; and streamline the environmental review process for future development projects in the community.

The nearest State facilities to the proposed project are I-110 and I-105. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports mixed-use, infill development that prioritizes nearby transit service, like the proposed Specific Plan aims to facilitate. The primary goals of the FFTOD Specific Plan are in direct alignment with State-level sustainable transportation policy goals which seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle and doubling trips made by walking and public transit, as well as achieving a reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in the California Transportation Plan 2040, Draft California Transportation Plan 2050, and Southern California Association of Governments (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue

more sustainable development. Projects, like the one proposed, can help California meet these goals.

There are two topics outlined in the NOP that should be addressed while developing the Draft Environmental Impact Report:

1) While Caltrans enthusiastically applauds the establishment and/or significant widening of sidewalks throughout the Plan area, this community benefit should not be primarily achieved through expanded right-of-way or private setback conditions. Improving safety and comfort for people walking or riding bicycles presents a rare opportunity to put existing road space to better use. When the extra space for sidewalks or bikeways is achieved through narrowing or eliminating car travel lanes, the bike- and walkability is further enhanced by calmed traffic and shorter crossing distances. These effects feed into one another, creating greater levels of comfort and allowing the area to become truly transit-oriented.

2) The decision to reduce or alter the amount of car parking required is a tremendous step in the right direction for this project to achieve its stated goals. Caltrans would encourage the lead agency to seriously consider taking this policy to its logical conclusion by eliminating parking requirements altogether. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building excessive car parking. By removing car parking requirements, this valuable and expensive space is exposed to the forces of the free market and creates an environment where only the car parking that is necessary will be built.

Caltrans looks forward to the forthcoming Draft Environmental Impact Report to confirm that the Project will result in a net reduction in Vehicle Miles Traveled.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2021-03522.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: April 6, 2021

NOrnelas@planning.lacounty.gov
Norman Ornelas Jr., Planner
County of Los Angeles, Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

**Notice of Preparation of a Draft Environmental Impact Report for the Florence-Firestone Transit Oriented District Specific Plan (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*[6] is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory[7].

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*[8] includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

**Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook[1], South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan[9], and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy[10].

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[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

[6] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: http://www.arb.ca.gov/ch/handbook.pdf.

[7] CARB's technical advisory can be found at: https://www.arb.ca.gov/ch/landuse.htm.

[8] South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

[9] South Coast AQMD's 2016 Air Quality Management Plan can be found at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf (starting on page 86).

[10] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC210311-04
Control Number

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
*"Parks Make Life Better!"*
Norma E. García-González, Director Alina Bokde, Chief Deputy Director

April 7, 2021

TO: Norman Ornelas
Department of Regional Planning

FROM: Julie Yom, AICP
Planning and CEQA Section

SUBJECT: **FLORENCE- FIRESTONE TRANSIT-ORIENTED DISTRICT SPECIFIC PLAN**
**NOTICE OF PREPARATION AND INITIAL STUDY FOR AN ENVIRONMENTAL IMPACT REPORT**
**PROJECT NO. PRJ2020-003127**
**SPECIFIC PLAN: RPPL2020009556**

The Department of Parks and Recreation (DPR) has reviewed the Initial Study (IS) for the Florence-Firestone Transit-Oriented District (FFTOD) Specific Plan. Please see our comments below:

**Initial Study**

Page 51, 15. Public Services, Parks?

- Revise the third sentence:

However, the ratio of park space per 1,000 residents compared to the ~~goal of 4 acres~~ County average of 3.3 acres per 1,000 residents.

Page 52, 16. Recreation a)

- Please replace the paragraph with the following:

The FFTOD Specific Plan Area contains five County parks: Ted Watkins Memorial Park, Franklin D. Roosevelt Park, Colonel Leon H. Washington Park, Mary MacLeod Bethune Park, and El Parque Nuestro. According to the 2016 Parks & Recreation Needs Assessment (PNA), Florence-Firestone has a very high park need. The PNA identifies that all five parks need improvements. Goals and policies from the FFCP address the need for more park facilities and improvements of existing facilities. The FFTOD Specific Plan would include land use changes that could allow for an increase in the population density of the area, which may increase the use of these parks such that further deterioration of the park facilities could occur. The impact is considered potentially significant and will be further analyzed in the EIR.

Page 52, 16. Recreation b)

- Revise the third sentence:

  As discussed in Response 16a, Florence-Firestone has a very high park need and the five parks within the FFTOD Specific Plan Area need improvements~~/ or are in poor condition~~.

Thank you for including this Department in the review of this document. If you have any questions, please contact me at jyom@parks.lacounty.gov or (626) 588-5311.

# COUNTY OF LOS ANGELES FIRE DEPARTMENT
## FIRE PREVENTION DIVISION

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4243, Fax (323) 890-9783

CASE NUMBER: FFER20200009523 MAP DATE: MARCH 15, 2021

PROJECT NUMBER: EIR PLANNER: ALEXANDRA CUADRA

---

**EIR**

1. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4

2. All fire lanes shall be clear of all encroachments, and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.

3. The required 20-foot wide driving surface shall be increased to 26 feet when fire hydrants are required. The 26 -foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location.

4. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance “clear to sky” Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Apparatus Access Road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official. Fire Code 503.1.1 & 503.2.2

5. Provide a minimum width of 34 feet for parallel parking on one side of the Fire Apparatus Access Road with through access and with one side of the roadway being designated “No Parking – Fire Lane”.

6. Provide approved signs or other approved notices or markings that include the words “NO PARKING - FIRE LANE”. Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3

Reviewed by: Joseph Youman Date: March 30, 2021

**COUNTY OF LOS ANGELES FIRE DEPARTMENT**
**FIRE PREVENTION DIVISION**

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4243, Fax (323) 890-9783

CASE NUMBER: FFER20200009523 MAP DATE: MARCH 15, 2021

PROJECT NUMBER: EIR PLANNER: ALEXANDRA CUADRA

7. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1

8. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. (Fire Code 503.2.4) Indicate the centerline, inside and outside turning radii for each change in direction on the site plan.

9. Dead-end Fire Apparatus Access Roads in excess of 150 feet in length shall be provided with an approved Fire Department turnaround. Fire Code 503.2.5

10. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4

11. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official. Fire Code 503.4.1

12. All required PUBLIC fire hydrants shall be installed, tested and accepted prior to beginning construction. Fire Code 501.4

13. All private on-site fire hydrants shall be installed, tested and approved prior to building occupancy. Fire Code 901.5.1

14. Provide a Form 196 signed and completed by the local water purveyor.

15. Show all existing public fire hydrants to within 300’ of all property lines.

**For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.**

Reviewed by: Joseph Youman Date: March 30, 2021

# COUNTY OF LOS ANGELES
## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

*"Proud Protectors of Life, Property, and the Environment"*

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN



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FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT


April 6, 2021

Norman Ornelas, Planner
Department of Regional Planning
Planning Department
320 W. Temple Street
Los Angeles, CA 90012

Dear Ms. Hui:

The County of Los Angeles Fire Department's Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division have reviewed the following case **RPPL2020009523.**

NOP/IS Florence Firestone TOD

The following are their comments:

**PLANNING DIVISION:**

We will reserve our comments for the draft EIR.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

**LAND DEVELOPMENT UNIT:**

1. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.

2. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.

3. The required 20-foot wide driving surface shall be increased to 26 feet when fire hydrants are required. The 26-foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location.

4. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Apparatus Access Road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2.

5. Provide a minimum width of 34 feet for parallel parking on one side of the Fire Apparatus Access Road with through access and with one side of the roadway being designated "No Parking – Fire Lane."

6. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3.

7. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.

8. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. (Fire Code 503.2.4) Indicate the centerline, inside and outside turning radii for each change in direction on the site plan.

9. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Fire Code 503.2.5.

10. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

11. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official. Fire Code 503.4.1

12. All required PUBLIC fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4.

13. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Fire Code 901.5.1.

14. Provide a Form 196 signed and completed by the local water purveyor.

15. Show all existing public fire hydrants to within 300' of all property lines.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF


April 14, 2021

Mr. Norman Ornelas, Jr.
Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Dear Mr. Ornelas:

**REVIEW COMMENTS**
**NOTICE OF PREPARATION**
**DRAFT ENVIRONMENTAL IMPACT REPORT**
**FLORENCE-FIRESTONE TRANSIT ORIENTED DISTRICT SPECIFIC PLAN**
**(PROJECT NO. PRJ2020-003127)**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the March 2021 Notice of Preparation of a Draft Environmental Impact Report (NOP-DEIR) for the proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (Specific Plan). The Specific Plan would propose new zoning categories, primarily within the 0.5-mile TOD area of the three Metro A Line stations (i.e. Slauson, Florence and Firestone train stations), that include development standards and design guidelines appropriate for meeting the planned density and intensity established by the Los Angeles County (County) General Plan 2035 Land Use Designations. The Specific Plan proposes nine new zoning categories and standards including setback and parking standards to address mobility issues in the community. The Specific Plan would also establish or widen sidewalks at key locations within the 0.5-mile TOD areas from the current range of 6 feet to 14 feet wide to the desired 12 feet to 15 feet and parkways with a minimum of 10 feet. This may be accomplished through the right-of-way expansion or through private setback conditions that contribute to the sidewalk width. The Specific Plan may reduce or alter the number of

required parking spaces associated with mixed use development or within the proximity to the Metro transit stations. These stations are located within the service area of the Department's Century Station (Station) and Transit Services Bureau (TSB).

Although these changes do not reflect on a specific project at this time, we concur that the proposed Specific Plan changes may result in a potentially significant impact as stated in Section 15, Public Services, page 50 of the Initial Study, increasing the level of service required by our Department when a proposed project within the new zoning categories is contemplated. The proposed TODs would increase daily population in the Department's service area and the anticipated ridership in those communities along the alignment and cross communities. An increase in population and use would potentially require additional sworn personnel, staff, vehicles, or equipment to maintain desired levels of service.

The Department recommends that analysis be completed to properly address proposed individual and cumulative impacts related to population growth and identify potential public safety concerns.

In addition, the Department recommends that the County and project applicant consider whether the proposed zoning changes for development on properties meet the general principles of Crime Prevention through Environmental Design (CPTED). The goal of CPTED is to reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior, while encouraging the legitimate use of the site. The overall tenets of CPTED include defensible space, territoriality, surveillance, lighting, landscaping, and physical security. With advanced notice, Department personnel can be available to discuss CPTED with the Project developer.

The Department reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed Project once additional information becomes available.

Also, for future reference, our Department provides the following updated address and contact information for all requests for review comments regarding law documents, the California Environmental Quality Act and/or other related correspondence that could potentially impact our Department services and facilities:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF

Tracey Jue, Director
Facilities Planning Bureau

**COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH**
**DIVISION OF ENVIRONMENTAL HEALTH**
5050 COMMERCE DRIVE BALDWIN PARK, CA 91706 (626) 430-5380

**April 22, 2021**

**CASE: RPPL2020009523**
**PROJECT: Environmental Plan**
**PLANNER: Ornelas, Norman**
**LOCATION: Unincorporated Florence-Firestone Area**

The Department of Public Health-Environmental Health Division has reviewed the Initial Study of the Florence-Firestone Transit -Oriented District Specific Plan.

***Public Health does not have any comments for the above project.***

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Please contact Shayne LaMont, Land Use Program for any questions regarding this report: slamont@ph.lacounty.gov.

*Prepared by: Shayne LaMont, EHS IV*
*Registered Environmental Health Specialist*
*Supervisorial District 5*

April 19, 2021

COMMUNITIES FOR A BETTER ENVIRONMENT
40 years | established 1978

Norman Ornelas, Jr., Regional Planner
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
nornelas@planning.lacounty.gov

**Re: Comment letter regarding FFTOD potential environmental effects.**

Dear Mr. Ornelas:

We at Communities for a Better Environment (CBE) appreciate the ability to submit this comment letter regarding the Florence-Firestone Transit-Oriented District Specific Plan ("FFTODSP"). The continuing COVID-19 pandemic has created many challenges in trying to meaningfully engage in public outreach. Many projects that CBE are presently working on remain greatly impacted by the digital divide and we ask that governmental agencies have patience when working with community-based organizations. While 30 days were given for public comment, we hope that with the future release of the Draft EIR the Department of Regional Planning provides at minimum 60 days for public comment. The proposed project will have many lasting impacts on the community, including CBE's membership in Southeast Los Angeles, and public input will be crucial for the success of this project.

Communities for a Better Environment is a community-based environmental justice organization located in both Southern and Northern California. In Southern California CBE is based out of Huntington Park and Wilmington.

The majority of census tracts in the area impacted by this proposed project scores within the 90$^{th}$ percentile under the California Environmental Screening tool ("CES"). CES is a mapping tool that aggregates data to identify which California communities are most impacted by environmental and socio-demographic burdens. CES uses environmental, health and socioeconomic information to produce scores for every census tract in the state. An area with a high CES score is one that experiences a much higher pollution burden than areas with low scores.

**COMMUNITY STABILITY**

FFTODSP is proposed in a community that has been historically disinvested in for decades. Projects within this corridor must utilize different anti-displacement strategies to ensure community stability. The map that shows the proposed project when overlayed on a map of the opportunity zones, shows that this area is also in danger of gentrification

impacts due to speculative investment. It is crucial to include robust public participation in furtherance of this project.

The area where the proposed TOD will go also has extremely high rates of rental burden and housing scarcity. It is crucial that upzoning in this area is tied to deeply affordable housing. Affordable housing creation and preservation is integral to community stability. In order to create an adequate Draft EIR we urge DRP to include an analysis of housing displacement and potential impacts on community character. Existing residents should be given priority access to affordable housing in the FFTOD to mitigate negative impacts caused by gentrification, such as loss of affordable housing.

Along with ensuring affordable housing, it is important to create a traffic and parking study in the Draft EIR. Currently, the area faces many parking challenges. While the goal is to ensure that there is a transit corridor that services the community, it is also important to balance equity needs where households require parking and car usage in order to engage in their livelihoods.

In addition, it would be helpful to provide community residents some level of literature review that substantiates the "benefits" and "costs" of this project, specifically outlining proposed demographic impacts and a timeline. Since this is not the first TOD project to be constructed, it would be helpful to review other TOD projects within LA County to assess the actual versus expected changes in: traffic magnitude and duration, vehicle miles traveled (e.g. average vs total), income levels, adjusted average rent rates, ridership, shifts, car density per dwelling unit, and commute times. This type of information would be helpful for community residents to understand the complete impact of this project.

The project should produce a corridor that creates community connectivity and should be intentional in the development of walkway improvements and bike lanes. For this, we suggest working closely with community members in developing programs that they would like to see.

**HAZARDOUS WASTE**

An assessment of the area shows potential contaminants from hazardous waste on the site, which could lead to harmful impacts on community health if disturbed during the process of project development. A thorough analysis of soil contamination is suggested prior to protect commencement.

The main goals of this project are to:

- Create transit-accessible housing development;
- Increase job-generating uses and economic activity;
- Develop a safe and attractive transportation network;
- Increase walking, bicycling, and transit ridership; and
- Streamline the environmental review process for future development projects in the community.

Streamlining projects in communities that have high rates of toxins in the soil is the soil is concerning given that projects may be approved without a thorough and proper analysis of the environmental impacts. Decades of industrial uses in these communities have resulted in higher pollution burden than the rest of the county. Often many empty lots are left as brownfields and no proper remediation is done. In contemplation of this project, an analysis should be done of the soil and soil vapor. Projects that are streamlined may not analyze these impacts and the rezoning of industrial to different uses will amount to community concerns in the future. In short, the FFTOD must include a hazardous waste clean-up analysis, including updated Cortese List Data Resources.

**WATER IMPACTS**

Similarly, to hazardous waste, groundwater contamination is a potential concern. The high concentration of industrial uses could have resulted in the improper removal of contaminants, and subsequently potential impacts on the area's water sources. Further development along this corridor may exacerbate negative water-quality impacts on the water table in the area. The DEIR must include an extensive hydrology and water quality analysis .

In addition, CBE would like to see how this project meets quantity and quality compliance standards stipulated in various Regional Water Quality Control Boards; specifically, how will this project meet the water quantity limits for on-site water retention?

**PARK EQUITY/GREEN SPACE**

Currently the area of the proposed project is considered to be park poor and lacking in public parks and green space. An analysis of park equity should be included in the FFTOD. In addition, any proposed rezoning should include incentives that encourage development of community parkland and green space for active and passive use. Integration of things like an urban tree canopy would be helpful to reduce pollution impacts from the transit corridor.

**PRESERVING CULTURAL AND COMMUNITY SPACES**

The Florence-Firestone library was mentioned in the Initial Study. Currently the community has had no access to this community resource, and it would be helpful to determine how this project will impact the library. Prior to the closing of the library, community groups and learning enrichment programs used the library to hold events. It is important that the library, which is seen as a vital resource for the community, remains readily accessible.

In the Draft EIR of this project, there is a mention of cultural resources, but it would be helpful to clearly identify those spaces. The community should be able to preserve potentially historic properties and not simply rezone those areas without community approval.

**CONCLUSION**

It is CBE's hope that the DRP work alongside community to develop this undertaking. This project must be one that helps preserve the rich history and community of Florence-Firestone as well as address many of the consequences of decades old racist practices of redlining. We look forward to working with DRP and hope that these comments may be useful in the creation of the Draft EIR.

Sincerely,



Jennifer Ganata
Senior Staff Attorney
Communities for a Better Environment

LOS ANGELES CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

April 14, 2021

**Sent Electronically**

Mr. Norman Ornelas, Jr.
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
Email: nornelas@planning.lacounty.gov

**RE: Notice of Preparation (NOP) for the Florence-Firestone Transit-Oriented District (TOD) Specific Plan (FFTOD), Project No. PRJ2020-003127 / Case No(s). Specific Plan: RPPL2020009556, Environmental: RPPL2020009523**

Dear Mr. Ornelas:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Florence-Firestone Transit-Oriented District (TOD) Specific Plan (FFTOD) Notice of Preparation (NOP). The proposed FFTOD will implement the LA County General Plan 2035 TOD Program and proposes new zoning categories, primarily within the 0.5-mile TOD area of the three Metro A Line stations, that include development standards and design guidelines appropriate for meeting the planned density and intensity established by the General Plan Land Use Designations. The Project will also update zoning categories for sites identified for the Regional Housing Needs Assessment (RHNA) by the Housing Element update (HEU).

In addition, the FFTOD would establish or widen sidewalks at key locations within the 0.5-mile TOD areas (portions of Slauson Avenue, Compton Avenue, Holmes Avenue, Nadeau Street, and Firestone Boulevard) from the current range of 6 feet to 14 feet to the desired 12 feet to 15 feet and parkways with a minimum of 10 feet. This may be accomplished through expanding the right-of-way or through private setback conditions that contribute to the sidewalk width; specific strategies will be identified in the FFTOD. Proposed improvements to sidewalks may adversely impact historic resources.

## I. Potential significant and unavoidable impacts to cultural resources

The Conservancy would like to better understand the proposed project as we believe zoning changes may result in direct and/or indirect significant impacts to cultural resources in the project location. According to the

California Office of Historic Preservation's Built Environment Resources Directory, a total of 27 previously recorded built environment resources were identified within the focused change area. Therefore, the Project may result in a substantial adverse change to these identified historic resources. In addition, according to the 2019 Florence-Firestone Community Plan, the majority of structures in Florence-Firestone were built during the 1920s through 1940s and have the potential to be considered historic resources, and may also be subject to significant and unavoidable environmental impacts.

A desktop reconnaissance study conducted by AECOM in September 2020, found 98 "individual properties of interest" which were over 45 years old, exhibit a moderate to high degree of historic integrity of design, materials, and workmanship, and/or possess historic significance related to the development of the community.[1] Additionally, the study found residential properties along Miramonte Boulevard from Gage Avenue to Florence Avenue represent a potential historic district with 92 historic-age properties. While we look forward to reviewing the Cultural Resources Technical Report, which will be prepared for the Project, we strongly encourage the Project Team to additionally conduct a Historic Resources Survey as part of the FFTOD. The Historic Resources Survey should include a community outreach component which will allow community stakeholders opportunities to provide input on local historic and cultural resources.

## II. Additional preservation alternatives should be evaluated and considered

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."[2] To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."[3] The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.[4] Reasonable alternatives must be considered "even if they substantially impede the project or are more costly."[5] Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.[6]

To ensure fair consideration of environmentally superior alternatives, the County of Los Angeles Department of Regional Planning should also examine the feasibility of adaptive reuse, modifications to zoning/land use, and introduction of incentive mechanisms in conjunction with the goals and objectives for the FFTOD.

The Conservancy strongly urges the County evaluate and consider these alternatives as part of a FFTOD, given CEQA's requirement to fully analyze alternatives and reduce impacts to historic resources where possible. This new information should be provided in the Draft EIR, allowing the public to better understand and comment on the full range of impacts and provide input prior to any issuance of a Final EIR.

In conclusion, the FFTOD is planned for a location with many cultural resources in unincorporated Los Angeles County. We strongly encourage the County of Los Angeles Department of Regional Planning conduct a Historic Resources Survey as part of the FFTOD, and explore historic designation of identified properties of interest and the potential historic

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[1] Florence-Firestone Community Atlas (September 2020), 87.
[2] Public Resource Code, Sec. 21001 (b), (c).
[3] *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.
[4] Guideline § 15126.6(a).
[5] *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).
[6] Public Resources Code § 21081.5.



district along Miramonte Boulevard. Any proposed sidewalk improvements should take care to minimize and avoid impacts to cultural resources and streetscapes. And, feasibility of adaptive reuse, modifications to zoning/land use, and introduction of incentive mechanisms should be evaluated and considered as part of the FFTOD.

Lastly, the Conservancy requests a meeting with both County of Los Angeles Department of Regional Planning and Florence-Firestone advocates. We believe that a meeting with the requested parties will provide an opportunity for the preservation community and County of Los Angeles Department of Regional Planning staff to find strategies to minimize and avoid impacts to historic resources in the FFTOD Project Area.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

**From:** Ashley Orona <oronash@gmail.com>
**Sent:** Wednesday, April 14, 2021 5:00 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; Gabriela Cid <AGCid@bos.lacounty.gov>; Amy Bodek <ABodek@planning.lacounty.gov>
**Subject:** Written Comment for FFTOD Specific Plan

CAUTION: External Email. Proceed Responsibly.

Dear whomever it may concern:

This letter is to outline several concerns regarding the Florence-Firestone Transit Oriented Specific Plan and recommendations on items that should be incorporated as part of this project.

Several residents have voiced concerns with limited and competitive parking in the community being amplified by recent and future developments. Since this project will be rezoning to allow for more and bigger development we feel it is reasonable to conduct a

parking study to make sure we are allocating sufficient parking spaces to the current and future residents. I understand that the County wants to move away from residents driving but the reality is that in our community many residents depend on their vehicles as a tool for their jobs, therefore, we need to plan for cars. A parking study can help evaluate solutions.

Another concern many residents have brought up to me while doing outreach for this project is that building height for the mixed used commercial corridors planned should be no more than 3-4 floors. Planning for future development aimed at increasing density by allowing taller buildings isn't sustainable for our urban community. Many residents have already expressed concern with the new development at 1600 E Florence Ave that is five floors, the tallest building in Florence-Firestone currently. They mention that the new building blocks the light from residential units right next door and eliminates any privacy that they have in their yards.

Many community members have also brought up incorporating a permanent independent building to house the Florence Library as part of the plan. There are two abandoned buildings on Florence Avenue that residents suggest: former ACE Hardware Store and Grifols Plasma Center.

I would like to suggest that rezoning in smaller residential streets such as those indicated as pink in the draft concept map be reduced, limited, or not done at all; rezoning should only be done on main streets. Rezoning large parts of the residential streets will be a direct cause of displacement. The reason for that is that many residents in Florence-Firestone are renters so if the property owner/landlord decides to, for example, redevelop an existing single-family home to courtyard homes, then the family living in the existing home can be at risk of displacement. Rezoning might also make it attractive to slumlords to sell their properties to big developers who have the means of building the type of housing that is being planned for. Many mom and pop property/ homeowners may not have the money or resources to redevelop, therefore, oy seems like developers are the big winners here, not the community. It seems like the plan focuses too much on new development instead of fixing a lot of the land that is currently underutilized and fixing a lot of the affordable housing that already exists.

Additionally, it seems like rezoning will put at risk a significant amount of culturally significant buildings in Florence-Firestone, including but not limited to the addresses below. We ask that these and other culturally significant spaces are not rezoned.

- Gentry Theater by architect S. Charles Lee
    - 6525 Compton Ave. Los Angeles, CA 90001
- Storybook house on Firestone Blvd.

    - 2181 Firestone Blvd. Los Angeles, CA 90001
- Graham Library
    - 1900 E. Firestone Blvd. Los Angeles, CA 90001 (current location)
    - 1925 E. 87th St. Los Angeles, CA 90002 (former location)
    - 8511 Holmes Ave. Los Angeles, CA 90001 (former location)
- The Century Youth Activities League (formerly the Firestone Park Sheriff's station) by architect James H. Garrott
    - 7901 Compton Ave. Los Angeles, CA 90001 - current location of Century Youth Activities League
    - 2201 E. Firestone Blvd. Los Angeles, CA 90001 - second location of Firestone Park Sheriff's station
    - 1551-1555-1557 E. Florence Ave. (1st location of Firestone Park station; also former locations of the Florence Library and Florence-Firestone Chamber of Commerce)
- Tessie Cleveland Community Services Corporation by architect James H. Garrott
    - 8019 Compton Ave. Los Angeles, CA 90001
- The Youth Activities League on Makee

    - 7116 S. Makee St. Los Angeles, CA 90001

- The Miramonte Blvd. Palm trees

    - Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south)

Please let me know if you have any questions regarding anything mentioned. You can reach me at this email.

Regards,
Ashley Orona

**From:** Astrid Campos <astridcampos81@gmail.com>
**Sent:** Wednesday, April 14, 2021 5:13 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; Gabriela Cid <AGCid@bos.lacounty.gov>; Amy Bodek <ABodek@planning.lacounty.gov>
**Subject:** Written Comments for FFTOD Specific Plan

CAUTION: External Email. Proceed Responsibly.

- Building height
    - No more than 3 floors. The new building on Florence eliminates privacy for single family homes and blocks out light for homes on Miramontes
- I don't agree with all the rezoning of the southside of Miramontes. The east side of miramontes is already zoned for multi-homes and now you will be rezoning for larger construction. Miramontes from Florence to Nadue is already overcrowded and now you

will make it worse. This project will also bring down property values for the homeowners on the westside of miramontes.

- Parking concerns - Your rezoning to add larger buildings around the metro stops will only add more congestion in areas with no parking. The fact that these buildings will not have parking, will make a horrible situation 10x worse.

- This project doesn't address any of the climate/environmental issues already in FF. Your project is bringing new development but isn't addressing the issues we already have. Trash all over FF, graffiti, and pollution from the train.

- Traffic study - speeding concerns down miramontes, hooper, Mai

- I would like to see trees along the train tracks. This would help to reduce the pollution from the train.

- Florence Library - needs to be put back on Florence.

- Allowing the market to determine parking needs doesn't work in an area with no parking.

- The ground vibration within a 1/2 mile of the train is already horrible and the additional construction only is making it worse. My home is covered in cracks from the 10-20 times of day the train passes through and shakes my home. All my neighbors have the same issue.

- Concerns about rezoning in residential areas developers may swoop in to buy up property to redevelop into duplexes/triplexes/etc and increase rents. The current limit of how many units in an acre is too much for this community to sustain. It will impact homeowners.

Best,

Astrid Campos
Homeowner in Florence Firestone
714-396-8242

**From:** Mia Martinez <m.martinez_00@yahoo.com>
**Sent:** Wednesday, April 14, 2021 5:00 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; Gabriela Cid <agcid13@gmail.com>; Amy Bodek <ABodek@planning.lacounty.gov>
**Subject:** Written Comments for FFTOD Specific Plan

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

Please be advised that the community is very concerned about gebntrification and fear getting displaced by new homes raising the average rent and by the use of median income of county. Pleaseb use the median income of the community as it is represented in the Census as it willbe more representative of the community's income.

Thank you!
Maria Martinez
(323) 829-6279

**From:** Silvia Trevino <trevinoasilvia@gmail.com>
**Sent:** Wednesday, April 14, 2021 4:30 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Amy Bodek <ABodek@planning.lacounty.gov>; Gabriela Cid <AGCid@bos.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>
**Subject:** FFTOD Public Comment

CAUTION: External Email. Proceed Responsibly.

Hello FFTOD Team,

My name is Silvia Trevino and I grew up in Florence-Firestone and am writing this comment on behalf of my mother and family that resides in unincorporated Florence-Firestone. I grew up in a single family home in Florence-Firestone that although had many problems of safety and access to supermarkets and health care I was able to enjoy access to the nearby parks and libraries (Graham and Florence). I hope that residents in the future can continue enjoying access to some fundamental resources such as our parks and libraries.

With the proposed FFTOD policy guidelines I worry that mixed use units with high numbers of floors will drastically change our community. We are already one of the most densely populated areas in LA County, we can only foresee that these new guideline will quickly explode our population over the next decade. We have many unhoused people in Florence-

Firestone, it is clear that Florence-Firestone is need of more housing, however that housing should not cause harm to any of our residents.

I along with other community members are supportive of building affordable housing in our community, but we hope that it is affordable to the people in our community as well. We hope that those who are currently unhoused in Florence-Firestone will have ample access to the newly created housing in Florence-Firestone. I would hope that market rate housing in our area in not prioritized but rather that the county focuses on supporting affordable accessible housing and grassroots programs for home owners and small mom and pop landlords in Florence-Firestone to increase the number of units in the residential areas.

As population increases in Florence-Firestones there are some issues that I believe should be considered when creating the FFTOD.

- Parking, we need to look into creative solutions to address the parking crises. Although the county can hope for the best, that new residents of the community will use public transport and not own personal vehicles, this is not realistic. We must hope for the best but prepare for the worst.
-Improving the electric grid and internet infrastructure. Last summer taught us all that power outages and internet outages were now part of the normal Florence-Firestone living experience. With increasing populations we must address our already overloaded electric grid and low capacity internet infrastructure.
-Increasing community resources. It would be important that with the increasing population we continue working on increasing park spaces, library spaces, and public community spaces. If we could also get more access to county health clinics that would be very needed in our community.
Lastly, with any changes like these there is a fear that gentrification will displace our community members both housed and unhoused. I believe that it is important for the county to provide us with ways in which it will minimize displacement in the community as a result of the FFTOD. Is this something that the county could monitor / measure ?

Thank you,
Silvia Trevino

**From:** Yanel Saenz <yn.saenz@gmail.com>
**Sent:** Wednesday, April 14, 2021 3:36 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; Gabriela Cid <AGCid@bos.lacounty.gov>; Amy Bodek <ABodek@planning.lacounty.gov>
**Subject:** Written comments for the FFTOD Specific Plan

CAUTION: External Email. Proceed Responsibly.

Hello FFTOD team,

I am submitting my written comments for the FFTOD Specific Plan as part of this comment period for the Initial Study and Notice of Preparation.

**Outreach:** First and foremost, I want to echo what other fellow residents have voiced in previous FFTOD Plan meetings regarding outreach for this project - this plan is proposing significant zoning changes to our community and many more Florence-Firestone residents should know about it. I urge there be more funding allocated towards outreach to all Florence-Firestone residents. At minimum, two mailers from DRP should be sent out to all residents informing them of the upcoming FFTOD meetings (along with a summary of the plan, the proposed zoning changes, and where to find more information).

**Aesthetics question a):** This question asks if the FFTOD Plan will have a substantial adverse effect on a scenic vista and is marked as “Less than Significant Impact” and the description states that there are no identified scenic resources within the study area. However, I want to point out that at the Roosevelt Park pedestrian bridge, the Firestone Metro Station, and the Slauson Metro Station, you are able to access scenic views of Downtown Los Angeles and the San Gabriel Mountains. The Roosevelt Park pedestrian bridge, in particular, represents a publicly accessible vantage point (whereas the Metro stations would require fare payment to access the elevated platforms). Many residents go to this vantage point to enjoy the view of Downtown Los Angeles with the mountains in the background and often take photos.

There aren't many locations in Florence-Firestone where you can access these type of views, and so with the rezoning to allow potential construction of high rise apartment complexes along commercial corridors north of Firestone Boulevard and north of Florence Avenue, these views will be obstructed (side note to include in the standards: the heights for future buildings along mixed-use corridors should be no more than 3-4 stories tall) and Florence-Firestone residents will lose access to these scenic views. At the scoping meeting it was mentioned that the scenic vistas being considered for the FFTOD Specific Plan only refer to scenic vistas designated in the General Plan or another planning document. The current FFTOD Specific Plan process seems to me like a great opportunity to be able designate this as a scenic vista and include it in this planning document. Also, I want to point out that the Florence-Firestone Community Plan includes a photo of the view from the Roosevelt Park pedestrian bridge (page 6). Therefore, although this view may not be explicitly mentioned as a scenic vista in planning documents, the scenic view is included there as a photograph and being used to enhance the aesthetics of this planning document, which I would argue means that residents and planning staff involved in the creation of the Florence-Firestone Community Plan agree that it's a great scenic view. I disagree with this question being marked as "Less Than Significant Impact" and this should be studied in the EIR and leveled up to "Potentially Significant Impact."

**Cultural/Historic Resources:** properties that have buildings with historic potential should not be rezoned so that the community has more time to investigate their historic and/or cultural significance and ask the County to conduct an in-depth historic resources survey (as there has been no historic landmark survey yet done in Los Angeles County and further, in Florence-Firestone). Rezoning may activate these properties for redevelopment and demolition, and we want to preserve as many historic and culturally significant buildings as possible. There were 98 properties identified through the desktop reconnaissance survey in the FFTOD Community Atlas document. Ideally, I would not want any of these 98 to be rezoned. However, below is a list of properties that have cultural and/or historic value that we want to prioritize at the moment (this is a living list and there may be many more that we haven't yet learned more about and may add later). Some of these properties are highlighted in the 2018 book by Jeannene Przyblyski titled *A Paseo Through Time in Florence-Firestone*, the first book to document the history of Florence-Firestone.

a. Gentry Theater by renowned movie theater architect S. Charles Lee
    i. 6525 Compton Ave. Los Angeles, CA 90001
b. Graham Library

i. 1900 E. Firestone Blvd. Los Angeles, CA 90001 (current location)

ii. 1925 E. 87th St. Los Angeles, CA 90002 (former location)

iii. 8511 Holmes Ave. Los Angeles, CA 90001 (former location)

c. The Century Youth Activities League (formerly the Firestone Park Sheriff's station) by architect James H. Garrott

i. 7901 Compton Ave. Los Angeles, CA 90001 - current location of Century Youth Activities League

ii. 2201 E. Firestone Blvd. Los Angeles, CA 90001 - second location of Firestone Park Sheriff's station

iii. 1551-1555-1557 E. Florence Ave. (1st location of Firestone Park station; also former locations of the Florence Library and Florence-Firestone Chamber of Commerce)

d. Tessie Cleveland Community Services Corporation by architect James H. Garrott

i. 8019 Compton Ave. Los Angeles, CA 90001

e. The Youth Activities League on Makee

i. 7116 S. Makee St. Los Angeles, CA 90001

f. Miramonte Blvd. (Palm trees and homes)

i. Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south)

**Florence Library:** The future location of the Florence Library remains a concern for Florence-Firestone residents that I want to highlight in case there are opportunities and strategies through the FFTOD Specific Plan to bring the library back to Florence Avenue. At the moment, the location for the library is set to be on the second floor of the County Constituent Services Center. However, there are two abandoned buildings on Florence Avenue, minutes away from the original location. These two buildings are the ACE Hardware Store (1669 E. Florence Ave. Los Angeles, CA 90001) and the Grifols Plasma Center (1715 E. Florence Ave. Los Angeles, CA 90001) and they fall within the FFTOD study area.

**Proposed Zoning Changes:** I have some concerns regarding rezoning of residential areas within the TOD study area; so what is proposed is rezoning of residential areas in order to allow increased density and number of dwelling units per property. I am concerned about this because 1) Florence-Firestone is already a dense neighborhood 2) this would exacerbate current parking issues (double parking and lack of parking availability, to add, we need a traffic and parking study) 3) considering that there isn't a current budget for outreach (through mailers) to all residents about these important meetings where these decisions are being made, I am concerned that there won't be a budget for future outreach to all residents with information about zoning changes to their property. Those who will be more aware and knowledgeable of zoning changes in Florence-Firestone will likely be outside developers and property buyers and I fear this will trigger an increased interest in the neighborhood leading to prey on vulnerable residents and their homes. Also, homeowners may not have the resources/money to be able to convert their single-family home into a duplex/triplex/etc. Additionally, renters are at risk of being displaced by landlords seeking to redevelop their properties and attract new renters (who they could charge higher rent to). In the long-term, I fear this may exacerbate the housing crisis and lead to displacement in Florence-Firestone. I understand that the FFTOD Specific Plan is not a development project itself, but the proposed zoning changes will set a domino effect of changes leading to displacement if adequate protections for renters and homeowners are not set in place.

Best regards,
Yanel Saenz

**Subject:** FW: FFTODSP - scoping meeting comments

**From:** Brian Wong <wong.brian@gmail.com>
**Sent:** Friday, April 2, 2021 3:36 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Subject:** FFTOD Population Growth Estimates

CAUTION: External Email. Proceed Responsibly.

Excited to learn more about the FFTOD Specific Plan. Are there population growth estimates for the 3-, 5-, and 10-years post adoption you could share? In reviewing the Initial Study, I was not able to find this information.

**14. POPULATION AND HOUSING**

| | *Potentially Significant Impact* | *Less Than Significant Impact with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| **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)?** | ☒ | ☐ | ☐ | ☐ |

**Potentially Significant Impact.** The Florence-Firestone community is primarily residential, with approximately 63 percent of the land within the area designated for residential use. The FFTOD Specific Plan would include residential and non-residential land use changes that could allow for an increase in the population density of the area. The residential zone changes would maintain existing residential neighborhoods while supporting a broader range of housing types, as well as encouraging medium-density and high-density residential near transit. Therefore, the Project has the potential to induce direct or indirect substantial unplanned population growth in the area. The impact is considered potentially significant and will be further analyzed in the EIR.

Thank you,
Brian

# APPENDIX B

# AIR QUALITY AND GREENHOUSE GAS EMISSIONS CALCULATIONS

**FFTOD Specific Plan - Air Quality and Greenhouse Gas Emissions Summary**
**Criteria Pollutants**

**Construction Emissions Summary**

| | Unmitigated - Regional Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | **ROG** | **NOx** | **CO** | **SO2** | **PM10** | **PM2.5** |
| **Maximum Daily Emissions** | 106.96 | 152.58 | 209.84 | 0.54 | 52.98 | 21.03 |
| **SCAQMD Threshold** | 75 | 100 | 550 | 150 | 150 | 55 |
| **Exceeds Threshold?** | **Yes** | **Yes** | No | No | No | No |

*Source: Winter CalEEMod Runs; Modeled by AECOM in 2021*
*Includes implementation of SCAQMD Rule 403 Fugitive Dust Requirements*

| | Mitigated - Regional Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | **ROG** | **NOx** | **CO** | **SO2** | **PM10 Total** | **PM2.5 Total** |
| **Maximum Daily Emissions** | 29.28 | 38.15 | 221.69 | 0.54 | 47.40 | 15.89 |
| **SCAQMD Threshold** | 75 | 100 | 550 | 150 | 150 | 55 |
| **Exceeds Threshold?** | No | No | No | No | No | No |

*Source: Winter CalEEMod Runs; Modeled by AECOM in 2021*
*Includes implementation of SCAQMD Rule 403 Fugitive Dust Requirements*
*Assumes the following mitigation measures:*
*Use of super-compliant VOC paints during construction*
*Tier 4 Final equipment for diesel engines greater than 50 hp.*

**Operational Emissions Summary**

| | Unmitigated - Regional Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| **Source** | **ROG** | **NOx** | **CO** | **SO2** | **PM10 Total** | **PM2.5 Total** |
| Area | 421.52 | 906.86 | 1376.71 | 5.77 | 77.93 | 77.93 |
| Energy | 3.71 | 31.93 | 15.33 | 0.20 | 2.56 | 2.56 |
| Mobile | 152.56 | 143.18 | 1477.94 | 3.13 | 429.65 | 115.69 |
| **Total** | 577.79 | 1081.98 | 2869.98 | 9.10 | 510.14 | 196.19 |
| SCAQMD Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Exceeds Threshold? | **Yes** | **Yes** | **Yes** | No | **Yes** | **Yes** |

| | Mitigated - Regional Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| **Source** | **ROG** | **NOx** | **CO** | **SO2** | **PM10 Total** | **PM2.5 Total** |
| Area | 316.74 | 11.49 | 995.70 | 0.05 | 5.54 | 5.54 |
| Energy | 3.71 | 31.93 | 15.33 | 0.20 | 2.56 | 2.56 |
| Mobile | 152.56 | 143.18 | 1477.94 | 3.13 | 429.65 | 115.69 |
| **Total** | 473.01 | 186.60 | 2488.97 | 3.38 | 437.75 | 123.80 |
| SCAQMD Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Exceeds Threshold? | **Yes** | **Yes** | **Yes** | No | **Yes** | **Yes** |

**GHG Emissions**

| Construction-Related GHG Emissions | |
|---|---|
| **Description** | **MT CO2e** |
| Maximum Annual Year | 6,490 |
| Total GHG Emissions | 25,961 |
| Amortized GHG Emissions | 865.36 |

*Notes:*
*Total construction demand determined based upon 4 times the maximum annual construction year (assumed to be 25% of total buildout)*
*Amortized GHG Emissions calculated over a 30-year project lifetime.*

| FFTOD GHG Emissions | |
|---|---|
| **Description** | **MT $CO_2e$** |
| Amortized Construction | 865 |
| Area | 209 |
| Energy | 18,076 |
| Mobile | 55,278 |
| Waste | 3,726 |
| Water | 4,420 |
| **Total** | **82,574** |
| Service Population | 37,441 |
| GHG Emissions per Service Population | 2.21 |

# State Target Setting Calculations

**GHG Emissions - State Target Setting Calculations**
(Based upon July 2020 Employment data and March 2021 Population data)

| Table 1 | | |
|---|---|---|
| **Statewide Emissions Inventory and Reduction Targets** | | |
| | **1990** | **2030** |
| Statewide Emissions Targets (MMT CO2e)[1] | 431 | 258.6 |
| Amount below 1990 Levels | 0% | 40% |

Note: MMT $CO_2e$ = million metric tons of carbon dioxide equivalent

[1] 40% below 1990 levels per SB 32

| Table 2 | | | |
|---|---|---|---|
| **Adjusted Statewide Emissions Inventory – Land Use-Related Sectors** | | | |
| **Main Sector / Sub Sector Level 1** | **Total Emissions (MMT $CO_2e$/yr)** [1] | **Adjusted Land Use-Related Emissions (MMT $CO_2e$/yr)** | **Notes/Adjustments from Totals** |
| Agriculture & Forestry | **18.9** | 0.0 | Not included in land use sector |
| Commercial | **14.4** | 13.9 | Excludes National Security emissions from Sub |
| Electricity Generation (Imports) | **61.5** | 61.5 | Land use sector includes all emissions |
| Electricity Generation (In State) | **49.0** | 34.4 | Excludes CHP: Industrial from Sub Sector Level |
| Industrial | **105.3** | 11.7 | Industrial emissions excluded from land use |
| *CHP: Industrial* | ***9.7*** | *0.0* | Not included, included CHP in electricity |
| *Flaring* | ***0.1*** | *0.0* | |
| *Landfills* | ***7.4*** | *7.4* | |
| *Manufacturing* | ***32.1*** | *0.7* | Construction emissions from Sub Sector Level |
| *Mining* | ***0.0*** | *0.0* | |
| *Not Specified* | ***2.7*** | *0.0* | |
| *Oil & Gas Extraction* | ***14.8*** | *0.0* | |
| *Petroleum Marketing* | ***0.0*** | *0.0* | |
| *Petroleum Refining* | ***32.8*** | *0.0* | |
| *Pipelines* | ***1.9*** | *0.0* | |
| *Waste Water Treatment* | ***3.6*** | *3.6* | Waste water treatment emissions are included |
| Not Specified | **1.3** | 1.3 | Land use sector includes all emissions |
| Residential | **29.7** | 29.7 | Land use sector includes all emissions |
| Transportation | **150.6** | 140.9 | Excludes Aviation, Rail, and Water-borne |
| **Total** | **431.0** | **293.5** | |

Notes: Sectors/sub-sectors may not sum exactly due to rounding
1 California 1990 Greenhouse Gas Emissions Level and 2020 Limit by Sector, ARB:
<http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>

| Table 3 | | | | | |
|---|---|---|---|---|---|
| **Land-Use Related Statewide Emissions Inventory, Forecasts, and Reduction Targets** | | | | | |
| | **1990** | **2020** | **2030** | **2035** | **2050** |
| Statewide Emissions Targets | 293.47 | 293.47 | 176.08 | 146.74 | 58.69 |
| Amount below 1990 Levels | 0% | 0% | 40% | 50% | 80% |

Note: MMT $CO_2e$ = million metric tons of carbon dioxide equivalent
2030 Emissions: 40% below 1990 levels (i.e., 2020 target levels) per SB 32
2035 Emissions: Interpolated between 2030 and 2050 targets
2050 Emissions: 80% below 1990 levels (i.e., 2020 target levels) per EO-S-3-05

| Table 4 | | | | | |
|---|---|---|---|---|---|
| **Statewide Demographic Projections** | | | | | |
| | **2028** | **2028_Land-Use Based**[3] | **2030** | **2030_Land-Use Based** | **2035_Land-Use Based** |
| Population[1] | 41,456,075 | 41,456,075 | 41,860,549 | 41,860,549 | 42,718,403 |
| Employment[1] | 20,412,500 | 18,996,600 | 20,611,658 | 19,181,944 | 19,575,042 |
| Service Population (population + employment) | 61,868,575 | 60,452,675 | 62,472,207 | 61,042,493 | 62,293,445 |
| Employment:Population Ratio | 49% | 46% | 49% | 46% | 46% |

Note: MMT $CO_2e$ = million metric tons of carbon dioxide equivalent
[1] DOF Table Total Estimated and Projected Population for California and Counties: July 1, 2010 to July 1, 2060 in 1-year increments. August 2020. Available online at: <http://www.dof.ca.gov/Forecasting/Demographics/projections/>

[2] 2028 Employment Data from EDD Labor Market Information Division (July 2020) Long Term Projections 2018-2028 <https://www.labormarketinfo.edd.ca.gov/data/employment-projections.html> . 2030 and 2035 Data is extrapolated based upon Employment to Population Ratio for 2028, and assumes consistent ratio.

[3] Sorted to remove jobs from: 11-9013 Farmers, Ranchers, and Other Agricultural Managers; 19-4041 Geological and Petroleum Technicians; 19-4093 Forest and Conservation Technicians; 45-000 Farming, Fishing, and Forestry Occupations; 47-5000 Extraction Workers; 49-3011 Aircraft Mechanics and Service Technicians; 49-3041 Farm Equipment Mechanics and Service Technicians; 49-9041 Industrial Machinery Mechanics; 49-9043 Maintenance Workers, Machinery; 49-9044 Millwrights; 51-0000 Production Occupations; 53-2000 Air Transportation Workers; 53-4000 Rail Transportation Workers; and 53-5000 Water Transportation Workers.

| Table 5 | | |
|---|---|---|
| **Local Efficiency Target (Land Use Based)** | | |
| | **2030** | **2035** |
| Emissions Targets (MT $CO_2e$/yr) | 176,082,940 | 146,735,783 |
| Service Population (SP) | 61,042,493 | 62,293,445 |
| Per Service Population Emissions Efficiency Targets | **2.88** | **2.36** |

Note: MMT $CO_2e$ = million metric tons of carbon dioxide equivalent;
Service Population (SP) = population + employment

# Trip Generation and VMT Data

**FFTOD Specific Plan - Trip Generation/VMT data**

| | | 2035 No Project | 2035 With Project | Net New Project [a] | Note |
|---|---|---|---|---|---|
| | Service Population (POP+EMP) | 74,390 | 111,831 | 37,441 | |
| Vehicle No Trucks | Total vehicle trips (no trucks) | 184,096 | 248,003 | 63,907 | |
| | Total vehicle VMT (no trucks) | 1,649,349 | 2,134,793 | 485,444 | |
| | Average vehicle trip distance (no trucks) | 9.0 | 8.6 | 7.596101 | [a] |
| Trucks Only | Total truck trips | 3,377 | 4,948 | 1,571 | |
| | Total truck VMT | 92,491 | 135,811 | 43,320 | |
| | Average truck trip distance | 27.4 | 27.4 | 27.57 | [a] |
| All Vehicles | Total vehicle trips (include trucks) | 187,473 | 252,951 | 65,478 | |
| | Total VMT (include trucks) | 1,741,840 | 2,270,604 | 528,764 | |
| | Total VMT per service population (include trucks) | 23.4 | 20.3 | 14.12 | [b] |

*Source: Fehr & Peers (June 2021)*

*Note:*

*[a] The 7.6 mile of average vehicle trip distance (no trucks) and 27.57 mile of average truck trip distance are not the trip lengths generated by the net new development directly, but the effect on vehicle trip and VMT for the whole project area. The effect of adding more housing and jobs to the study area will reduce trip length on average. In order to compute the average vehicle distance, the net new VMT should be divided by the net new vehicle trips, but this should not be interpreted to mean that the new development will have markedly different patterns than the existing development; rather the effects on travel of adding housing and employment will be to bring everyone's average down (including existing uses).*

*[b] We recommend to divide the net change of Total VMT by the net change of Service Population. Please note that the results of 14.12 VMT per Service Population is not actual VMT per Service Popualtion generated by the new development. It means that by adding new housing and jobs, this VMT metric will decrease on average.*

**Fleet Mix Breakout Percentage of Truck by Categories**

| Truck Categories [a] | | 2035 No Project | Fleet Mix Breakout % (2035 No Project) | 2035 With Project | Fleet Mix Breakout % (2035 With Project) | Net New Project | Fleet Mix Breakout % (Net New Project) |
|---|---|---|---|---|---|---|---|
| **LHDT** | Vehicle Trips | 1,092 | 32% | 1,643 | 33% | 551 | 35% |
| **MHDT** | Vehicle Trips | 808 | 24% | 1,154 | 23% | 346 | 22% |
| **HHDT** | Vehicle Trips | 1,477 | 44% | 2,151 | 43% | 674 | 43% |
| | | | | | | | |
| **Total Trucks** | Vehicle Trips | 3,377 | 100% | 4,948 | 100% | 1,571 | 100% |

*Source: Fehr & Peers (June 2021)*

*Notes:*

*[a] SCAG defines these three classes by weight:*

*LHDT: light-heavy duty truck (8,500 to 14,000 lbs. gross vehicle weight (GVW))*

*MHDT: medium-heavy duty truck (14,001 to 33,000 lbs. GVW)*

*HHDT: heavy-heavy duty truck (>33,000 lbs. GVW)*

# CalEEMod Runs - Annual and Daily Outputs

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan: Construction

**Los Angeles-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 2,699.00 | Dwelling Unit | 45.00 | 2,699,000.00 | 10524 |
| Strip Mall | 250.56 | 1000sqft | 0.00 | 250,559.33 | 0 |
| Office Park | 23.74 | 1000sqft | 0.00 | 23,737.97 | 0 |
| Apartments Mid Rise | 163.00 | Dwelling Unit | 13.43 | 163,000.00 | 636 |
| Strip Mall | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| High Turnover (Sit Down Restaurant) | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| Apartments Mid Rise | 75.00 | Dwelling Unit | 6.11 | 75,000.00 | 293 |
| Apartments Mid Rise | 15.00 | Dwelling Unit | 17.38 | 15,000.00 | 59 |
| Office Park | 3.29 | 1000sqft | 0.00 | 3,291.82 | 0 |
| Apartments Mid Rise | 40.00 | Dwelling Unit | 68.77 | 40,000.00 | 154 |
| High Turnover (Sit Down Restaurant) | 10.42 | 1000sqft | 0.00 | 10,421.72 | 0 |
| Apartments Low Rise | 36.00 | Dwelling Unit | 75.81 | 36,000.00 | 140 |
| Office Park | 0.49 | 1000sqft | 0.00 | 494.76 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Project Characteristics -

Land Use - Proposed land use types and acreages per SP and info on SF to LU. Maximum estimate of 25% of land uses constructed in a single year.

Construction Phase - During maximum development scenario year, all phases of construction could overlap in time throughout the Specific Plan area.

Off-road Equipment - Construction equipment from CalEEMod defaults.

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Grading - Default acres graded.

Trips and VMT - Construction trips from CalEEMod defaults.

Architectural Coating -

Vehicle Trips - Construction-only emissions estimates. Operational values zeroed out.

Woodstoves - Construction-only emissions estimates. Operational values zeroed out.

Area Coating - Construction-only emissions estimates. Operational values zeroed out.

Energy Use - Construction-only emissions estimates. Operational values zeroed out.

Water And Wastewater - Construction-only emissions estimates. Operational values zeroed out.

Solid Waste - Construction-only emissions estimates. Operational values zeroed out.

Construction Off-road Equipment Mitigation - Assumes implementation of SCAQMD Rule 403 for fugitive dust control.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblAreaCoating | Area_Nonresidential_Exterior | 147876 | 0 |
| tblAreaCoating | Area_Nonresidential_Interior | 443629 | 0 |
| tblAreaCoating | Area_Residential_Exterior | 2043900 | 0 |
| tblAreaCoating | Area_Residential_Interior | 6131700 | 0 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 4,650.00 | 260.00 |
| tblConstructionPhase | NumDays | 300.00 | 260.00 |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblConstructionPhase | NumDays | 465.00 | 260.00 |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 180.00 | 260.00 |
| tblConstructionPhase | PhaseEndDate | 6/20/2029 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 12/9/2026 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 8/23/2006 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 2/11/2009 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 3/15/2028 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 5/2/2007 | 12/30/2022 |
| tblConstructionPhase | PhaseStartDate | 3/16/2028 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 2/12/2009 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 6/30/2005 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 5/3/2007 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 12/10/2026 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 8/24/2006 | 1/1/2022 |
| tblEnergyUse | LightingElect | 810.36 | 0.00 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 7.87 | 0.00 |
| tblEnergyUse | LightingElect | 3.74 | 0.00 |
| tblEnergyUse | LightingElect | 6.26 | 0.00 |
| tblEnergyUse | NT24E | 3,172.76 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 28.16 | 0.00 |
| tblEnergyUse | NT24E | 4.79 | 0.00 |
| tblEnergyUse | NT24E | 3.23 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 187.78 | 0.00 |
| tblEnergyUse | NT24NG | 0.19 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblEnergyUse | NT24NG | 0.49 | 0.00 |
| tblEnergyUse | T24E | 28.76 | 0.00 |
| tblEnergyUse | T24E | 35.05 | 0.00 |
| tblEnergyUse | T24E | 7.24 | 0.00 |
| tblEnergyUse | T24E | 5.01 | 0.00 |
| tblEnergyUse | T24E | 3.58 | 0.00 |
| tblEnergyUse | T24NG | 8,848.67 | 0.00 |
| tblEnergyUse | T24NG | 4,179.80 | 0.00 |
| tblEnergyUse | T24NG | 42.55 | 0.00 |
| tblEnergyUse | T24NG | 9.50 | 0.00 |
| tblEnergyUse | T24NG | 1.14 | 0.00 |
| tblFireplaces | NumberGas | 30.60 | 0.00 |
| tblFireplaces | NumberGas | 2,543.20 | 0.00 |
| tblFireplaces | NumberWood | 1.80 | 0.00 |
| tblFireplaces | NumberWood | 149.60 | 0.00 |
| tblLandUse | LandUseSquareFeet | 250,559.00 | 250,559.33 |
| tblLandUse | LandUseSquareFeet | 23,738.00 | 23,737.97 |
| tblLandUse | LandUseSquareFeet | 10,421.70 | 10,421.72 |
| tblLandUse | LotAcreage | 71.03 | 45.00 |
| tblLandUse | LotAcreage | 5.75 | 0.00 |
| tblLandUse | LotAcreage | 0.54 | 0.00 |
| tblLandUse | LotAcreage | 4.29 | 13.43 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.97 | 6.11 |
| tblLandUse | LotAcreage | 0.39 | 17.38 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.05 | 68.77 |
| tblLandUse | LotAcreage | 0.24 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblLandUse | LotAcreage | 2.25 | 75.81 |
| tblLandUse | LotAcreage | 0.01 | 0.00 |
| tblLandUse | Population | 7,719.00 | 10,524.00 |
| tblLandUse | Population | 466.00 | 636.00 |
| tblLandUse | Population | 215.00 | 293.00 |
| tblLandUse | Population | 43.00 | 59.00 |
| tblLandUse | Population | 114.00 | 154.00 |
| tblLandUse | Population | 103.00 | 140.00 |
| tblSolidWaste | SolidWasteGenerationRate | 16.56 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 1,376.32 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 167.20 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 25.59 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 266.89 | 0.00 |
| tblVehicleTrips | ST_TR | 8.14 | 0.00 |
| tblVehicleTrips | ST_TR | 4.91 | 0.00 |
| tblVehicleTrips | ST_TR | 122.40 | 0.00 |
| tblVehicleTrips | ST_TR | 1.64 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 0.00 |
| tblVehicleTrips | SU_TR | 6.28 | 0.00 |
| tblVehicleTrips | SU_TR | 4.09 | 0.00 |
| tblVehicleTrips | SU_TR | 142.64 | 0.00 |
| tblVehicleTrips | SU_TR | 0.76 | 0.00 |
| tblVehicleTrips | SU_TR | 20.43 | 0.00 |
| tblVehicleTrips | WD_TR | 7.32 | 0.00 |
| tblVehicleTrips | WD_TR | 5.44 | 0.00 |
| tblVehicleTrips | WD_TR | 112.18 | 0.00 |
| tblVehicleTrips | WD_TR | 11.07 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 0.00 |
| tblWater | IndoorWaterUseRate | 2,345,544.92 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblWater | IndoorWaterUseRate | 194,940,844.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,264,648.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,891,232.74 | 0.00 |
| tblWater | IndoorWaterUseRate | 18,827,753.51 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,478,713.10 | 0.00 |
| tblWater | OutdoorWaterUseRate | 122,897,489.02 | 0.00 |
| tblWater | OutdoorWaterUseRate | 272,211.62 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,997,852.33 | 0.00 |
| tblWater | OutdoorWaterUseRate | 11,539,590.86 | 0.00 |
| tblWoodstoves | NumberCatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberCatalytic | 149.60 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 149.60 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 106.9593 | 152.5836 | 209.8426 | 0.5356 | 62.5296 | 6.3235 | 68.8531 | 22.7396 | 5.8595 | 28.5991 | 0.0000 | 53,893.6854 | 53,893.6854 | 6.5914 | 1.8781 | 54,618.1290 |
| **Maximum** | **106.9593** | **152.5836** | **209.8426** | **0.5356** | **62.5296** | **6.3235** | **68.8531** | **22.7396** | **5.8595** | **28.5991** | **0.0000** | **53,893.6854** | **53,893.6854** | **6.5914** | **1.8781** | **54,618.1290** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 106.9593 | 152.5836 | 209.8426 | 0.5356 | 46.6563 | 6.3235 | 52.9797 | 15.1737 | 5.8595 | 21.0332 | 0.0000 | 53,893.6854 | 53,893.6854 | 6.5914 | 1.8781 | 54,618.1290 |
| **Maximum** | **106.9593** | **152.5836** | **209.8426** | **0.5356** | **46.6563** | **6.3235** | **52.9797** | **15.1737** | **5.8595** | **21.0332** | **0.0000** | **53,893.6854** | **53,893.6854** | **6.5914** | **1.8781** | **54,618.1290** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **25.39** | **0.00** | **23.05** | **33.27** | **0.00** | **26.46** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 2 | Site Preparation | Site Preparation | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 3 | Grading | Grading | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 4 | Building Construction | Building Construction | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 5 | Paving | Paving | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 6 | Architectural Coating | Architectural Coating | 1/1/2022 | 12/30/2022 | 5 | 260 | |

**Acres of Grading (Site Preparation Phase): 390**

**Acres of Grading (Grading Phase): 780**

**Acres of Paving: 0**

**Residential Indoor: 6,131,700; Residential Outdoor: 2,043,900; Non-Residential Indoor: 443,630; Non-Residential Outdoor: 147,877; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | |
|---|---|---|---|---|---|
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 2,276.00 | 372.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 455.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.6392 | 25.7194 | 20.5941 | 0.0388 | | 1.2427 | 1.2427 | | 1.1553 | 1.1553 | | 3,746.7812 | 3,746.7812 | 1.0524 | | 3,773.0920 |
| **Total** | **2.6392** | **25.7194** | **20.5941** | **0.0388** | | **1.2427** | **1.2427** | | **1.1553** | **1.1553** | | **3,746.7812** | **3,746.7812** | **1.0524** | | **3,773.0920** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.6392 | 25.7194 | 20.5941 | 0.0388 | | 1.2427 | 1.2427 | | 1.1553 | 1.1553 | 0.0000 | 3,746.7812 | 3,746.7812 | 1.0524 | | 3,773.0920 |
| **Total** | **2.6392** | **25.7194** | **20.5941** | **0.0388** | | **1.2427** | **1.2427** | | **1.1553** | **1.1553** | **0.0000** | **3,746.7812** | **3,746.7812** | **1.0524** | | **3,773.0920** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 19.6570 | 0.0000 | 19.6570 | 10.1025 | 0.0000 | 10.1025 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1701 | 33.0835 | 19.6978 | 0.0380 | | 1.6126 | 1.6126 | | 1.4836 | 1.4836 | | 3,686.0619 | 3,686.0619 | 1.1922 | | 3,715.8655 |
| **Total** | **3.1701** | **33.0835** | **19.6978** | **0.0380** | **19.6570** | **1.6126** | **21.2696** | **10.1025** | **1.4836** | **11.5860** | | **3,686.0619** | **3,686.0619** | **1.1922** | | **3,715.8655** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0667 | 0.0503 | 0.6514 | 1.7400e-003 | 0.2012 | 1.2900e-003 | 0.2025 | 0.0534 | 1.1900e-003 | 0.0546 | | 177.3240 | 177.3240 | 5.1300e-003 | 4.8100e-003 | 178.8864 |
| **Total** | **0.0667** | **0.0503** | **0.6514** | **1.7400e-003** | **0.2012** | **1.2900e-003** | **0.2025** | **0.0534** | **1.1900e-003** | **0.0546** | | **177.3240** | **177.3240** | **5.1300e-003** | **4.8100e-003** | **178.8864** |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.8457 | 0.0000 | 8.8457 | 4.5461 | 0.0000 | 4.5461 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1701 | 33.0835 | 19.6978 | 0.0380 | | 1.6126 | 1.6126 | | 1.4836 | 1.4836 | 0.0000 | 3,686.0619 | 3,686.0619 | 1.1922 | | 3,715.8655 |
| **Total** | **3.1701** | **33.0835** | **19.6978** | **0.0380** | **8.8457** | **1.6126** | **10.4582** | **4.5461** | **1.4836** | **6.0297** | **0.0000** | **3,686.0619** | **3,686.0619** | **1.1922** | | **3,715.8655** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0667 | 0.0503 | 0.6514 | 1.7400e-003 | 0.2012 | 1.2900e-003 | 0.2025 | 0.0534 | 1.1900e-003 | 0.0546 | | 177.3240 | 177.3240 | 5.1300e-003 | 4.8100e-003 | 178.8864 |
| **Total** | **0.0667** | **0.0503** | **0.6514** | **1.7400e-003** | **0.2012** | **1.2900e-003** | **0.2025** | **0.0534** | **1.1900e-003** | **0.0546** | | **177.3240** | **177.3240** | **5.1300e-003** | **4.8100e-003** | **178.8864** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 9.2036 | 0.0000 | 9.2036 | 3.6538 | 0.0000 | 3.6538 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **9.2036** | **1.6349** | **10.8385** | **3.6538** | **1.5041** | **5.1579** | | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0741 | 0.0558 | 0.7237 | 1.9400e-003 | 0.2236 | 1.4300e-003 | 0.2250 | 0.0593 | 1.3200e-003 | 0.0606 | | 197.0266 | 197.0266 | 5.7000e-003 | 5.3500e-003 | 198.7627 |
| **Total** | **0.0741** | **0.0558** | **0.7237** | **1.9400e-003** | **0.2236** | **1.4300e-003** | **0.2250** | **0.0593** | **1.3200e-003** | **0.0606** | | **197.0266** | **197.0266** | **5.7000e-003** | **5.3500e-003** | **198.7627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 4.1416 | 0.0000 | 4.1416 | 1.6442 | 0.0000 | 1.6442 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | 0.0000 | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **4.1416** | **1.6349** | **5.7765** | **1.6442** | **1.5041** | **3.1483** | **0.0000** | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0741 | 0.0558 | 0.7237 | 1.9400e-003 | 0.2236 | 1.4300e-003 | 0.2250 | 0.0593 | 1.3200e-003 | 0.0606 | | 197.0266 | 197.0266 | 5.7000e-003 | 5.3500e-003 | 198.7627 |
| **Total** | **0.0741** | **0.0558** | **0.7237** | **1.9400e-003** | **0.2236** | **1.4300e-003** | **0.2250** | **0.0593** | **1.3200e-003** | **0.0606** | | **197.0266** | **197.0266** | **5.7000e-003** | **5.3500e-003** | **198.7627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.7233 | 18.9733 | 6.4637 | 0.0729 | 2.3828 | 0.1742 | 2.5570 | 0.6861 | 0.1667 | 0.8527 | | 7,832.1129 | 7,832.1129 | 0.2608 | 1.1297 | 8,175.2691 |
| Worker | 8.4329 | 6.3546 | 82.3621 | 0.2204 | 25.4403 | 0.1631 | 25.6034 | 6.7469 | 0.1501 | 6.8970 | | 22,421.6306 | 22,421.6306 | 0.6485 | 0.6086 | 22,619.1936 |
| **Total** | **9.1561** | **25.3279** | **88.8258** | **0.2933** | **27.8231** | **0.3373** | **28.1604** | **7.4330** | **0.3168** | **7.7498** | | **30,253.7435** | **30,253.7435** | **0.9093** | **1.7382** | **30,794.4627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | 0.0000 | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | **0.0000** | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.7233 | 18.9733 | 6.4637 | 0.0729 | 2.3828 | 0.1742 | 2.5570 | 0.6861 | 0.1667 | 0.8527 | | 7,832.1129 | 7,832.1129 | 0.2608 | 1.1297 | 8,175.2691 |
| Worker | 8.4329 | 6.3546 | 82.3621 | 0.2204 | 25.4403 | 0.1631 | 25.6034 | 6.7469 | 0.1501 | 6.8970 | | 22,421.6306 | 22,421.6306 | 0.6485 | 0.6086 | 22,619.1936 |
| **Total** | **9.1561** | **25.3279** | **88.8258** | **0.2933** | **27.8231** | **0.3373** | **28.1604** | **7.4330** | **0.3168** | **7.7498** | | **30,253.7435** | **30,253.7435** | **0.9093** | **1.7382** | **30,794.4627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.1028 | 11.1249 | 14.5805 | 0.0228 | | 0.5679 | 0.5679 | | 0.5225 | 0.5225 | | 2,207.6603 | 2,207.6603 | 0.7140 | | 2,225.5104 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.1028** | **11.1249** | **14.5805** | **0.0228** | | **0.5679** | **0.5679** | | **0.5225** | **0.5225** | | **2,207.6603** | **2,207.6603** | **0.7140** | | **2,225.5104** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.1028 | 11.1249 | 14.5805 | 0.0228 | | 0.5679 | 0.5679 | | 0.5225 | 0.5225 | 0.0000 | 2,207.6603 | 2,207.6603 | 0.7140 | | 2,225.5104 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.1028** | **11.1249** | **14.5805** | **0.0228** | | **0.5679** | **0.5679** | | **0.5225** | **0.5225** | **0.0000** | **2,207.6603** | **2,207.6603** | **0.7140** | | **2,225.5104** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 3.7 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 83.4177 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.2045 | 1.4085 | 1.8136 | 2.9700e-003 | | 0.0817 | 0.0817 | | 0.0817 | 0.0817 | | 281.4481 | 281.4481 | 0.0183 | | 281.9062 |
| **Total** | **83.6222** | **1.4085** | **1.8136** | **2.9700e-003** | | **0.0817** | **0.0817** | | **0.0817** | **0.0817** | | **281.4481** | **281.4481** | **0.0183** | | **281.9062** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.6858 | 1.2704 | 16.4652 | 0.0441 | 5.0858 | 0.0326 | 5.1184 | 1.3488 | 0.0300 | 1.3788 | | 4,482.3559 | 4,482.3559 | 0.1297 | 0.1217 | 4,521.8511 |
| **Total** | **1.6858** | **1.2704** | **16.4652** | **0.0441** | **5.0858** | **0.0326** | **5.1184** | **1.3488** | **0.0300** | **1.3788** | | **4,482.3559** | **4,482.3559** | **0.1297** | **0.1217** | **4,521.8511** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 3.7 Architectural Coating - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 83.4177 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.2045 | 1.4085 | 1.8136 | 2.9700e-003 | | 0.0817 | 0.0817 | | 0.0817 | 0.0817 | 0.0000 | 281.4481 | 281.4481 | 0.0183 | | 281.9062 |
| **Total** | **83.6222** | **1.4085** | **1.8136** | **2.9700e-003** | | **0.0817** | **0.0817** | | **0.0817** | **0.0817** | **0.0000** | **281.4481** | **281.4481** | **0.0183** | | **281.9062** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.6858 | 1.2704 | 16.4652 | 0.0441 | 5.0858 | 0.0326 | 5.1184 | 1.3488 | 0.0300 | 1.3788 | | 4,482.3559 | 4,482.3559 | 0.1297 | 0.1217 | 4,521.8511 |
| **Total** | **1.6858** | **1.2704** | **16.4652** | **0.0441** | **5.0858** | **0.0326** | **5.1184** | **1.3488** | **0.0300** | **1.3788** | | **4,482.3559** | **4,482.3559** | **0.1297** | **0.1217** | **4,521.8511** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Total | 0.00 | 0.00 | 0.00 | | |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| High Turnover (Sit Down Restaurant) | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Office Park | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |
| Unmitigated | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 65.8103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 7.4458 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | | 449.8811 | 449.8811 | 0.4284 | | 460.5902 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | | **1.3855** | **1.3855** | | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 65.8103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 7.4458 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | | 449.8811 | 449.8811 | 0.4284 | | 460.5902 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | | **1.3855** | **1.3855** | | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan: Construction - Mitigated

**Los Angeles-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 2,699.00 | Dwelling Unit | 45.00 | 2,699,000.00 | 10524 |
| Strip Mall | 250.56 | 1000sqft | 0.00 | 250,559.33 | 0 |
| Office Park | 23.74 | 1000sqft | 0.00 | 23,737.97 | 0 |
| Apartments Mid Rise | 163.00 | Dwelling Unit | 13.43 | 163,000.00 | 636 |
| Strip Mall | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| High Turnover (Sit Down Restaurant) | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| Apartments Mid Rise | 75.00 | Dwelling Unit | 6.11 | 75,000.00 | 293 |
| Apartments Mid Rise | 15.00 | Dwelling Unit | 17.38 | 15,000.00 | 59 |
| Office Park | 3.29 | 1000sqft | 0.00 | 3,291.82 | 0 |
| Apartments Mid Rise | 40.00 | Dwelling Unit | 68.77 | 40,000.00 | 154 |
| High Turnover (Sit Down Restaurant) | 10.42 | 1000sqft | 0.00 | 10,421.72 | 0 |
| Apartments Low Rise | 36.00 | Dwelling Unit | 75.81 | 36,000.00 | 140 |
| Office Park | 0.49 | 1000sqft | 0.00 | 494.76 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Project Characteristics -

Land Use - Proposed land use types and acreages per SP and info on SF to LU. Maximum estimate of 25% of land uses constructed in a single year.

Construction Phase - During maximum development scenario year, all phases of construction could overlap in time throughout the Specific Plan area.

Off-road Equipment - Construction equipment from CalEEMod defaults.

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Grading - Default acres graded.

Trips and VMT - Construction trips from CalEEMod defaults.

Architectural Coating - Use of super-compliant VOC paints as mitigation (<10 g/L).

Vehicle Trips - Construction-only emissions estimates. Operational values zeroed out.

Woodstoves - Construction-only emissions estimates. Operational values zeroed out.

Area Coating - Construction-only emissions estimates. Operational values zeroed out.

Energy Use - Construction-only emissions estimates. Operational values zeroed out.

Water And Wastewater - Construction-only emissions estimates. Operational values zeroed out.

Solid Waste - Construction-only emissions estimates. Operational values zeroed out.

Construction Off-road Equipment Mitigation - Assumes implementation of SCAQMD Rule 403 for fugitive dust control. Mitigation to include Tier 4 final engines for equipment engines >50 hp.

Area Mitigation - Use of super compliant VOC paint (10 g/L) during construction.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblArchitecturalCoating | EF_Nonresidential_Exterior | 100.00 | 10.00 |
| tblArchitecturalCoating | EF_Nonresidential_Interior | 100.00 | 10.00 |
| tblArchitecturalCoating | EF_Residential_Exterior | 50.00 | 10.00 |
| tblArchitecturalCoating | EF_Residential_Interior | 50.00 | 10.00 |
| tblAreaCoating | Area_Nonresidential_Exterior | 147876 | 0 |
| tblAreaCoating | Area_Nonresidential_Interior | 443629 | 0 |
| tblAreaCoating | Area_Residential_Exterior | 2043900 | 0 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblAreaCoating | Area_Residential_Interior | 6131700 | 0 |
| tblAreaMitigation | UseLowVOCPaintNonresidentialExteriorValue | 100 | 10 |
| tblAreaMitigation | UseLowVOCPaintNonresidentialInteriorValue | 100 | 10 |
| tblAreaMitigation | UseLowVOCPaintResidentialExteriorValue | 50 | 10 |
| tblAreaMitigation | UseLowVOCPaintResidentialInteriorValue | 50 | 10 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 5.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 3.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 6.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 9.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 4,650.00 | 260.00 |
| tblConstructionPhase | NumDays | 300.00 | 260.00 |
| tblConstructionPhase | NumDays | 465.00 | 260.00 |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 180.00 | 260.00 |
| tblConstructionPhase | PhaseEndDate | 6/20/2029 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 12/9/2026 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 8/23/2006 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 2/11/2009 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 3/15/2028 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 5/2/2007 | 12/30/2022 |
| tblConstructionPhase | PhaseStartDate | 3/16/2028 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 2/12/2009 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 6/30/2005 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 5/3/2007 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 12/10/2026 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 8/24/2006 | 1/1/2022 |
| tblEnergyUse | LightingElect | 810.36 | 0.00 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 7.87 | 0.00 |
| tblEnergyUse | LightingElect | 3.74 | 0.00 |
| tblEnergyUse | LightingElect | 6.26 | 0.00 |
| tblEnergyUse | NT24E | 3,172.76 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblEnergyUse | NT24E | 28.16 | 0.00 |
| tblEnergyUse | NT24E | 4.79 | 0.00 |
| tblEnergyUse | NT24E | 3.23 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 187.78 | 0.00 |
| tblEnergyUse | NT24NG | 0.19 | 0.00 |
| tblEnergyUse | NT24NG | 0.49 | 0.00 |
| tblEnergyUse | T24E | 28.76 | 0.00 |
| tblEnergyUse | T24E | 35.05 | 0.00 |
| tblEnergyUse | T24E | 7.24 | 0.00 |
| tblEnergyUse | T24E | 5.01 | 0.00 |
| tblEnergyUse | T24E | 3.58 | 0.00 |
| tblEnergyUse | T24NG | 8,848.67 | 0.00 |
| tblEnergyUse | T24NG | 4,179.80 | 0.00 |
| tblEnergyUse | T24NG | 42.55 | 0.00 |
| tblEnergyUse | T24NG | 9.50 | 0.00 |
| tblEnergyUse | T24NG | 1.14 | 0.00 |
| tblFireplaces | NumberGas | 30.60 | 0.00 |
| tblFireplaces | NumberGas | 2,543.20 | 0.00 |
| tblFireplaces | NumberWood | 1.80 | 0.00 |
| tblFireplaces | NumberWood | 149.60 | 0.00 |
| tblLandUse | LandUseSquareFeet | 250,559.00 | 250,559.33 |
| tblLandUse | LandUseSquareFeet | 23,738.00 | 23,737.97 |
| tblLandUse | LandUseSquareFeet | 10,421.70 | 10,421.72 |
| tblLandUse | LotAcreage | 71.03 | 45.00 |
| tblLandUse | LotAcreage | 5.75 | 0.00 |
| tblLandUse | LotAcreage | 0.54 | 0.00 |
| tblLandUse | LotAcreage | 4.29 | 13.43 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.97 | 6.11 |
| tblLandUse | LotAcreage | 0.39 | 17.38 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.05 | 68.77 |
| tblLandUse | LotAcreage | 0.24 | 0.00 |
| tblLandUse | LotAcreage | 2.25 | 75.81 |
| tblLandUse | LotAcreage | 0.01 | 0.00 |
| tblLandUse | Population | 7,719.00 | 10,524.00 |
| tblLandUse | Population | 466.00 | 636.00 |
| tblLandUse | Population | 215.00 | 293.00 |
| tblLandUse | Population | 43.00 | 59.00 |
| tblLandUse | Population | 114.00 | 154.00 |
| tblLandUse | Population | 103.00 | 140.00 |
| tblSolidWaste | SolidWasteGenerationRate | 16.56 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 1,376.32 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 167.20 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 25.59 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 266.89 | 0.00 |
| tblVehicleTrips | ST_TR | 8.14 | 0.00 |
| tblVehicleTrips | ST_TR | 4.91 | 0.00 |
| tblVehicleTrips | ST_TR | 122.40 | 0.00 |
| tblVehicleTrips | ST_TR | 1.64 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 0.00 |
| tblVehicleTrips | SU_TR | 6.28 | 0.00 |
| tblVehicleTrips | SU_TR | 4.09 | 0.00 |
| tblVehicleTrips | SU_TR | 142.64 | 0.00 |
| tblVehicleTrips | SU_TR | 0.76 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblVehicleTrips | SU_TR | 20.43 | 0.00 |
| tblVehicleTrips | WD_TR | 7.32 | 0.00 |
| tblVehicleTrips | WD_TR | 5.44 | 0.00 |
| tblVehicleTrips | WD_TR | 112.18 | 0.00 |
| tblVehicleTrips | WD_TR | 11.07 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 0.00 |
| tblWater | IndoorWaterUseRate | 2,345,544.92 | 0.00 |
| tblWater | IndoorWaterUseRate | 194,940,844.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,264,648.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,891,232.74 | 0.00 |
| tblWater | IndoorWaterUseRate | 18,827,753.51 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,478,713.10 | 0.00 |
| tblWater | OutdoorWaterUseRate | 122,897,489.02 | 0.00 |
| tblWater | OutdoorWaterUseRate | 272,211.62 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,997,852.33 | 0.00 |
| tblWater | OutdoorWaterUseRate | 11,539,590.86 | 0.00 |
| tblWoodstoves | NumberCatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberCatalytic | 149.60 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 149.60 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 39.1707 | 152.5836 | 209.8426 | 0.5356 | 62.5296 | 6.3235 | 68.8531 | 22.7396 | 5.8595 | 28.5991 | 0.0000 | 53,893.6854 | 53,893.6854 | 6.5914 | 1.8781 | 54,618.1290 |
| **Maximum** | **39.1707** | **152.5836** | **209.8426** | **0.5356** | **62.5296** | **6.3235** | **68.8531** | **22.7396** | **5.8595** | **28.5991** | **0.0000** | **53,893.6854** | **53,893.6854** | **6.5914** | **1.8781** | **54,618.1290** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 29.2833 | 38.1467 | 221.6870 | 0.5356 | 46.6563 | 0.7431 | 47.3994 | 15.1737 | 0.7196 | 15.8933 | 0.0000 | 53,893.6854 | 53,893.6854 | 6.5914 | 1.8781 | 54,618.1290 |
| **Maximum** | **29.2833** | **38.1467** | **221.6870** | **0.5356** | **46.6563** | **0.7431** | **47.3994** | **15.1737** | **0.7196** | **15.8933** | **0.0000** | **53,893.6854** | **53,893.6854** | **6.5914** | **1.8781** | **54,618.1290** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **25.24** | **75.00** | **-5.64** | **0.00** | **25.39** | **88.25** | **31.16** | **33.27** | **87.72** | **44.43** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 2 | Site Preparation | Site Preparation | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 3 | Grading | Grading | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 4 | Building Construction | Building Construction | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 5 | Paving | Paving | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 6 | Architectural Coating | Architectural Coating | 1/1/2022 | 12/30/2022 | 5 | 260 | |

**Acres of Grading (Site Preparation Phase): 390**

**Acres of Grading (Grading Phase): 780**

**Acres of Paving: 0**

**Residential Indoor: 6,131,700; Residential Outdoor: 2,043,900; Non-Residential Indoor: 443,630; Non-Residential Outdoor: 147,877; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | |
|---|---|---|---|---|---|
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 2,276.00 | 372.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 455.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Reduce Vehicle Speed on Unpaved Roads

### 3.2 Demolition - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.6392 | 25.7194 | 20.5941 | 0.0388 | | 1.2427 | 1.2427 | | 1.1553 | 1.1553 | | 3,746.7812 | 3,746.7812 | 1.0524 | | 3,773.0920 |
| **Total** | **2.6392** | **25.7194** | **20.5941** | **0.0388** | | **1.2427** | **1.2427** | | **1.1553** | **1.1553** | | **3,746.7812** | **3,746.7812** | **1.0524** | | **3,773.0920** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.4623 | 2.0032 | 23.2798 | 0.0388 | | 0.0616 | 0.0616 | | 0.0616 | 0.0616 | 0.0000 | 3,746.7812 | 3,746.7812 | 1.0524 | | 3,773.0920 |
| **Total** | **0.4623** | **2.0032** | **23.2798** | **0.0388** | | **0.0616** | **0.0616** | | **0.0616** | **0.0616** | **0.0000** | **3,746.7812** | **3,746.7812** | **1.0524** | | **3,773.0920** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 19.6570 | 0.0000 | 19.6570 | 10.1025 | 0.0000 | 10.1025 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.1701 | 33.0835 | 19.6978 | 0.0380 | | 1.6126 | 1.6126 | | 1.4836 | 1.4836 | | 3,686.0619 | 3,686.0619 | 1.1922 | | 3,715.8655 |
| **Total** | **3.1701** | **33.0835** | **19.6978** | **0.0380** | **19.6570** | **1.6126** | **21.2696** | **10.1025** | **1.4836** | **11.5860** | | **3,686.0619** | **3,686.0619** | **1.1922** | | **3,715.8655** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0667 | 0.0503 | 0.6514 | 1.7400e-003 | 0.2012 | 1.2900e-003 | 0.2025 | 0.0534 | 1.1900e-003 | 0.0546 | | 177.3240 | 177.3240 | 5.1300e-003 | 4.8100e-003 | 178.8864 |
| **Total** | **0.0667** | **0.0503** | **0.6514** | **1.7400e-003** | **0.2012** | **1.2900e-003** | **0.2025** | **0.0534** | **1.1900e-003** | **0.0546** | | **177.3240** | **177.3240** | **5.1300e-003** | **4.8100e-003** | **178.8864** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 8.8457 | 0.0000 | 8.8457 | 4.5461 | 0.0000 | 4.5461 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.4656 | 2.0175 | 20.8690 | 0.0380 | | 0.0621 | 0.0621 | | 0.0621 | 0.0621 | 0.0000 | 3,686.0619 | 3,686.0619 | 1.1922 | | 3,715.8655 |
| **Total** | **0.4656** | **2.0175** | **20.8690** | **0.0380** | **8.8457** | **0.0621** | **8.9077** | **4.5461** | **0.0621** | **4.6082** | **0.0000** | **3,686.0619** | **3,686.0619** | **1.1922** | | **3,715.8655** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0667 | 0.0503 | 0.6514 | 1.7400e-003 | 0.2012 | 1.2900e-003 | 0.2025 | 0.0534 | 1.1900e-003 | 0.0546 | | 177.3240 | 177.3240 | 5.1300e-003 | 4.8100e-003 | 178.8864 |
| **Total** | **0.0667** | **0.0503** | **0.6514** | **1.7400e-003** | **0.2012** | **1.2900e-003** | **0.2025** | **0.0534** | **1.1900e-003** | **0.0546** | | **177.3240** | **177.3240** | **5.1300e-003** | **4.8100e-003** | **178.8864** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 9.2036 | 0.0000 | 9.2036 | 3.6538 | 0.0000 | 3.6538 | | | 0.0000 | | | 0.0000 |
| Off-Road | 3.6248 | 38.8435 | 29.0415 | 0.0621 | | 1.6349 | 1.6349 | | 1.5041 | 1.5041 | | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **3.6248** | **38.8435** | **29.0415** | **0.0621** | **9.2036** | **1.6349** | **10.8385** | **3.6538** | **1.5041** | **5.1579** | | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0741 | 0.0558 | 0.7237 | 1.9400e-003 | 0.2236 | 1.4300e-003 | 0.2250 | 0.0593 | 1.3200e-003 | 0.0606 | | 197.0266 | 197.0266 | 5.7000e-003 | 5.3500e-003 | 198.7627 |
| **Total** | **0.0741** | **0.0558** | **0.7237** | **1.9400e-003** | **0.2236** | **1.4300e-003** | **0.2250** | **0.0593** | **1.3200e-003** | **0.0606** | | **197.0266** | **197.0266** | **5.7000e-003** | **5.3500e-003** | **198.7627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 4.1416 | 0.0000 | 4.1416 | 1.6442 | 0.0000 | 1.6442 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.7616 | 3.3000 | 32.9991 | 0.0621 | | 0.1015 | 0.1015 | | 0.1015 | 0.1015 | 0.0000 | 6,011.4105 | 6,011.4105 | 1.9442 | | 6,060.0158 |
| **Total** | **0.7616** | **3.3000** | **32.9991** | **0.0621** | **4.1416** | **0.1015** | **4.2432** | **1.6442** | **0.1015** | **1.7457** | **0.0000** | **6,011.4105** | **6,011.4105** | **1.9442** | | **6,060.0158** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0741 | 0.0558 | 0.7237 | 1.9400e-003 | 0.2236 | 1.4300e-003 | 0.2250 | 0.0593 | 1.3200e-003 | 0.0606 | | 197.0266 | 197.0266 | 5.7000e-003 | 5.3500e-003 | 198.7627 |
| **Total** | **0.0741** | **0.0558** | **0.7237** | **1.9400e-003** | **0.2236** | **1.4300e-003** | **0.2250** | **0.0593** | **1.3200e-003** | **0.0606** | | **197.0266** | **197.0266** | **5.7000e-003** | **5.3500e-003** | **198.7627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.7062 | 15.6156 | 16.3634 | 0.0269 | | 0.8090 | 0.8090 | | 0.7612 | 0.7612 | | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **1.7062** | **15.6156** | **16.3634** | **0.0269** | | **0.8090** | **0.8090** | | **0.7612** | **0.7612** | | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.7233 | 18.9733 | 6.4637 | 0.0729 | 2.3828 | 0.1742 | 2.5570 | 0.6861 | 0.1667 | 0.8527 | | 7,832.1129 | 7,832.1129 | 0.2608 | 1.1297 | 8,175.2691 |
| Worker | 8.4329 | 6.3546 | 82.3621 | 0.2204 | 25.4403 | 0.1631 | 25.6034 | 6.7469 | 0.1501 | 6.8970 | | 22,421.6306 | 22,421.6306 | 0.6485 | 0.6086 | 22,619.1936 |
| **Total** | **9.1561** | **25.3279** | **88.8258** | **0.2933** | **27.8231** | **0.3373** | **28.1604** | **7.4330** | **0.3168** | **7.7498** | | **30,253.7435** | **30,253.7435** | **0.9093** | **1.7382** | **30,794.4627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.5608 | 2.6936 | 17.6592 | 0.0269 | | 0.1018 | 0.1018 | | 0.1018 | 0.1018 | 0.0000 | 2,554.3336 | 2,554.3336 | 0.6120 | | 2,569.6322 |
| **Total** | **0.5608** | **2.6936** | **17.6592** | **0.0269** | | **0.1018** | **0.1018** | | **0.1018** | **0.1018** | **0.0000** | **2,554.3336** | **2,554.3336** | **0.6120** | | **2,569.6322** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.7233 | 18.9733 | 6.4637 | 0.0729 | 2.3828 | 0.1742 | 2.5570 | 0.6861 | 0.1667 | 0.8527 | | 7,832.1129 | 7,832.1129 | 0.2608 | 1.1297 | 8,175.2691 |
| Worker | 8.4329 | 6.3546 | 82.3621 | 0.2204 | 25.4403 | 0.1631 | 25.6034 | 6.7469 | 0.1501 | 6.8970 | | 22,421.6306 | 22,421.6306 | 0.6485 | 0.6086 | 22,619.1936 |
| **Total** | **9.1561** | **25.3279** | **88.8258** | **0.2933** | **27.8231** | **0.3373** | **28.1604** | **7.4330** | **0.3168** | **7.7498** | | **30,253.7435** | **30,253.7435** | **0.9093** | **1.7382** | **30,794.4627** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.1028 | 11.1249 | 14.5805 | 0.0228 | | 0.5679 | 0.5679 | | 0.5225 | 0.5225 | | 2,207.6603 | 2,207.6603 | 0.7140 | | 2,225.5104 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **1.1028** | **11.1249** | **14.5805** | **0.0228** | | **0.5679** | **0.5679** | | **0.5225** | **0.5225** | | **2,207.6603** | **2,207.6603** | **0.7140** | | **2,225.5104** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.2805 | 1.2154 | 17.2957 | 0.0228 | | 0.0374 | 0.0374 | | 0.0374 | 0.0374 | 0.0000 | 2,207.6603 | 2,207.6603 | 0.7140 | | 2,225.5104 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.2805** | **1.2154** | **17.2957** | **0.0228** | | **0.0374** | **0.0374** | | **0.0374** | **0.0374** | **0.0000** | **2,207.6603** | **2,207.6603** | **0.7140** | | **2,225.5104** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0556 | 0.0419 | 0.5428 | 1.4500e-003 | 0.1677 | 1.0700e-003 | 0.1687 | 0.0445 | 9.9000e-004 | 0.0455 | | 147.7700 | 147.7700 | 4.2700e-003 | 4.0100e-003 | 149.0720 |
| **Total** | **0.0556** | **0.0419** | **0.5428** | **1.4500e-003** | **0.1677** | **1.0700e-003** | **0.1687** | **0.0445** | **9.9000e-004** | **0.0455** | | **147.7700** | **147.7700** | **4.2700e-003** | **4.0100e-003** | **149.0720** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.7 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 15.6291 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.2045 | 1.4085 | 1.8136 | 2.9700e-003 | | 0.0817 | 0.0817 | | 0.0817 | 0.0817 | | 281.4481 | 281.4481 | 0.0183 | | 281.9062 |
| **Total** | **15.8336** | **1.4085** | **1.8136** | **2.9700e-003** | | **0.0817** | **0.0817** | | **0.0817** | **0.0817** | | **281.4481** | **281.4481** | **0.0183** | | **281.9062** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.6858 | 1.2704 | 16.4652 | 0.0441 | 5.0858 | 0.0326 | 5.1184 | 1.3488 | 0.0300 | 1.3788 | | 4,482.3559 | 4,482.3559 | 0.1297 | 0.1217 | 4,521.8511 |
| **Total** | **1.6858** | **1.2704** | **16.4652** | **0.0441** | **5.0858** | **0.0326** | **5.1184** | **1.3488** | **0.0300** | **1.3788** | | **4,482.3559** | **4,482.3559** | **0.1297** | **0.1217** | **4,521.8511** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.7 Architectural Coating - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 15.6291 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.0297 | 0.1288 | 1.8324 | 2.9700e-003 | | 3.9600e-003 | 3.9600e-003 | | 3.9600e-003 | 3.9600e-003 | 0.0000 | 281.4481 | 281.4481 | 0.0183 | | 281.9062 |
| **Total** | **15.6588** | **0.1288** | **1.8324** | **2.9700e-003** | | **3.9600e-003** | **3.9600e-003** | | **3.9600e-003** | **3.9600e-003** | **0.0000** | **281.4481** | **281.4481** | **0.0183** | | **281.9062** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.6858 | 1.2704 | 16.4652 | 0.0441 | 5.0858 | 0.0326 | 5.1184 | 1.3488 | 0.0300 | 1.3788 | | 4,482.3559 | 4,482.3559 | 0.1297 | 0.1217 | 4,521.8511 |
| **Total** | **1.6858** | **1.2704** | **16.4652** | **0.0441** | **5.0858** | **0.0326** | **5.1184** | **1.3488** | **0.0300** | **1.3788** | | **4,482.3559** | **4,482.3559** | **0.1297** | **0.1217** | **4,521.8511** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Total | 0.00 | 0.00 | 0.00 | | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| High Turnover (Sit Down Restaurant) | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Office Park | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Residential Exterior

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |
| Unmitigated | 73.2561 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | 0.0000 | 449.8811 | 449.8811 | 0.4284 | 0.0000 | 460.5902 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 65.8103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 7.4458 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | | 449.8811 | 449.8811 | 0.4284 | | 460.5902 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | | **1.3855** | **1.3855** | | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 65.8103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 7.4458 | 2.8723 | 248.9658 | 0.0132 | | 1.3855 | 1.3855 | | 1.3855 | 1.3855 | | 449.8811 | 449.8811 | 0.4284 | | 460.5902 |
| **Total** | **73.2561** | **2.8723** | **248.9658** | **0.0132** | | **1.3855** | **1.3855** | | **1.3855** | **1.3855** | **0.0000** | **449.8811** | **449.8811** | **0.4284** | **0.0000** | **460.5902** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan: Construction

**Los Angeles-South Coast County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 2,699.00 | Dwelling Unit | 45.00 | 2,699,000.00 | 10524 |
| Strip Mall | 250.56 | 1000sqft | 0.00 | 250,559.33 | 0 |
| Office Park | 23.74 | 1000sqft | 0.00 | 23,737.97 | 0 |
| Apartments Mid Rise | 163.00 | Dwelling Unit | 13.43 | 163,000.00 | 636 |
| Strip Mall | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| High Turnover (Sit Down Restaurant) | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| Apartments Mid Rise | 75.00 | Dwelling Unit | 6.11 | 75,000.00 | 293 |
| Apartments Mid Rise | 15.00 | Dwelling Unit | 17.38 | 15,000.00 | 59 |
| Office Park | 3.29 | 1000sqft | 0.00 | 3,291.82 | 0 |
| Apartments Mid Rise | 40.00 | Dwelling Unit | 68.77 | 40,000.00 | 154 |
| High Turnover (Sit Down Restaurant) | 10.42 | 1000sqft | 0.00 | 10,421.72 | 0 |
| Apartments Low Rise | 36.00 | Dwelling Unit | 75.81 | 36,000.00 | 140 |
| Office Park | 0.49 | 1000sqft | 0.00 | 494.76 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Project Characteristics -

Land Use - Proposed land use types and acreages per SP and info on SF to LU. Maximum estimate of 25% of land uses constructed in a single year.

Construction Phase - During maximum development scenario year, all phases of construction could overlap in time throughout the Specific Plan area.

Off-road Equipment - Construction equipment from CalEEMod defaults.

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Grading - Default acres graded.

Trips and VMT - Construction trips from CalEEMod defaults.

Architectural Coating -

Vehicle Trips - Construction-only emissions estimates. Operational values zeroed out.

Woodstoves - Construction-only emissions estimates. Operational values zeroed out.

Area Coating - Construction-only emissions estimates. Operational values zeroed out.

Energy Use - Construction-only emissions estimates. Operational values zeroed out.

Water And Wastewater - Construction-only emissions estimates. Operational values zeroed out.

Solid Waste - Construction-only emissions estimates. Operational values zeroed out.

Construction Off-road Equipment Mitigation - Assumes implementation of SCAQMD Rule 403 for fugitive dust control.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblAreaCoating | Area_Nonresidential_Exterior | 147876 | 0 |
| tblAreaCoating | Area_Nonresidential_Interior | 443629 | 0 |
| tblAreaCoating | Area_Residential_Exterior | 2043900 | 0 |
| tblAreaCoating | Area_Residential_Interior | 6131700 | 0 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 4,650.00 | 260.00 |
| tblConstructionPhase | NumDays | 300.00 | 260.00 |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblConstructionPhase | NumDays | 465.00 | 260.00 |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 180.00 | 260.00 |
| tblConstructionPhase | PhaseEndDate | 6/20/2029 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 12/9/2026 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 8/23/2006 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 2/11/2009 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 3/15/2028 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 5/2/2007 | 12/30/2022 |
| tblConstructionPhase | PhaseStartDate | 3/16/2028 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 2/12/2009 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 6/30/2005 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 5/3/2007 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 12/10/2026 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 8/24/2006 | 1/1/2022 |
| tblEnergyUse | LightingElect | 810.36 | 0.00 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 7.87 | 0.00 |
| tblEnergyUse | LightingElect | 3.74 | 0.00 |
| tblEnergyUse | LightingElect | 6.26 | 0.00 |
| tblEnergyUse | NT24E | 3,172.76 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 28.16 | 0.00 |
| tblEnergyUse | NT24E | 4.79 | 0.00 |
| tblEnergyUse | NT24E | 3.23 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 187.78 | 0.00 |
| tblEnergyUse | NT24NG | 0.19 | 0.00 |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblEnergyUse | NT24NG | 0.49 | 0.00 |
| tblEnergyUse | T24E | 28.76 | 0.00 |
| tblEnergyUse | T24E | 35.05 | 0.00 |
| tblEnergyUse | T24E | 7.24 | 0.00 |
| tblEnergyUse | T24E | 5.01 | 0.00 |
| tblEnergyUse | T24E | 3.58 | 0.00 |
| tblEnergyUse | T24NG | 8,848.67 | 0.00 |
| tblEnergyUse | T24NG | 4,179.80 | 0.00 |
| tblEnergyUse | T24NG | 42.55 | 0.00 |
| tblEnergyUse | T24NG | 9.50 | 0.00 |
| tblEnergyUse | T24NG | 1.14 | 0.00 |
| tblFireplaces | NumberGas | 30.60 | 0.00 |
| tblFireplaces | NumberGas | 2,543.20 | 0.00 |
| tblFireplaces | NumberWood | 1.80 | 0.00 |
| tblFireplaces | NumberWood | 149.60 | 0.00 |
| tblLandUse | LandUseSquareFeet | 250,559.00 | 250,559.33 |
| tblLandUse | LandUseSquareFeet | 23,738.00 | 23,737.97 |
| tblLandUse | LandUseSquareFeet | 10,421.70 | 10,421.72 |
| tblLandUse | LotAcreage | 71.03 | 45.00 |
| tblLandUse | LotAcreage | 5.75 | 0.00 |
| tblLandUse | LotAcreage | 0.54 | 0.00 |
| tblLandUse | LotAcreage | 4.29 | 13.43 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.97 | 6.11 |
| tblLandUse | LotAcreage | 0.39 | 17.38 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.05 | 68.77 |
| tblLandUse | LotAcreage | 0.24 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblLandUse | LotAcreage | 2.25 | 75.81 |
| tblLandUse | LotAcreage | 0.01 | 0.00 |
| tblLandUse | Population | 7,719.00 | 10,524.00 |
| tblLandUse | Population | 466.00 | 636.00 |
| tblLandUse | Population | 215.00 | 293.00 |
| tblLandUse | Population | 43.00 | 59.00 |
| tblLandUse | Population | 114.00 | 154.00 |
| tblLandUse | Population | 103.00 | 140.00 |
| tblSolidWaste | SolidWasteGenerationRate | 16.56 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 1,376.32 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 167.20 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 25.59 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 266.89 | 0.00 |
| tblVehicleTrips | ST_TR | 8.14 | 0.00 |
| tblVehicleTrips | ST_TR | 4.91 | 0.00 |
| tblVehicleTrips | ST_TR | 122.40 | 0.00 |
| tblVehicleTrips | ST_TR | 1.64 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 0.00 |
| tblVehicleTrips | SU_TR | 6.28 | 0.00 |
| tblVehicleTrips | SU_TR | 4.09 | 0.00 |
| tblVehicleTrips | SU_TR | 142.64 | 0.00 |
| tblVehicleTrips | SU_TR | 0.76 | 0.00 |
| tblVehicleTrips | SU_TR | 20.43 | 0.00 |
| tblVehicleTrips | WD_TR | 7.32 | 0.00 |
| tblVehicleTrips | WD_TR | 5.44 | 0.00 |
| tblVehicleTrips | WD_TR | 112.18 | 0.00 |
| tblVehicleTrips | WD_TR | 11.07 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 0.00 |
| tblWater | IndoorWaterUseRate | 2,345,544.92 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblWater | IndoorWaterUseRate | 194,940,844.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,264,648.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,891,232.74 | 0.00 |
| tblWater | IndoorWaterUseRate | 18,827,753.51 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,478,713.10 | 0.00 |
| tblWater | OutdoorWaterUseRate | 122,897,489.02 | 0.00 |
| tblWater | OutdoorWaterUseRate | 272,211.62 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,997,852.33 | 0.00 |
| tblWater | OutdoorWaterUseRate | 11,539,590.86 | 0.00 |
| tblWoodstoves | NumberCatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberCatalytic | 149.60 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 149.60 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 13.8038 | 19.8791 | 27.6052 | 0.0702 | 8.0439 | 0.8220 | 8.8659 | 2.9353 | 0.7617 | 3.6970 | 0.0000 | 6,404.3562 | 6,404.3562 | 0.7775 | 0.2228 | 6,490.1980 |
| **Maximum** | **13.8038** | **19.8791** | **27.6052** | **0.0702** | **8.0439** | **0.8220** | **8.8659** | **2.9353** | **0.7617** | **3.6970** | **0.0000** | **6,404.3562** | **6,404.3562** | **0.7775** | **0.2228** | **6,490.1980** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 13.8038 | 19.8791 | 27.6052 | 0.0702 | 5.9804 | 0.8220 | 6.8024 | 1.9517 | 0.7617 | 2.7134 | 0.0000 | 6,404.3537 | 6,404.3537 | 0.7775 | 0.2228 | 6,490.1954 |
| **Maximum** | **13.8038** | **19.8791** | **27.6052** | **0.0702** | **5.9804** | **0.8220** | **6.8024** | **1.9517** | **0.7617** | **2.7134** | **0.0000** | **6,404.3537** | **6,404.3537** | **0.7775** | **0.2228** | **6,490.1954** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **25.65** | **0.00** | **23.27** | **33.51** | **0.00** | **26.60** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| 67 | 12-30-2021 | 3-29-2022 | 8.1571 | 8.1571 |
| 68 | 3-30-2022 | 6-29-2022 | 8.4581 | 8.4581 |
| 69 | 6-30-2022 | 9-29-2022 | 8.4566 | 8.4566 |
| | | Highest | 8.4581 | 8.4581 |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 2 | Site Preparation | Site Preparation | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 3 | Grading | Grading | 1/1/2022 | 12/30/2022 | 5 | 260 | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | | |
|---|---|---|---|---|---|---|
| 4 | Building Construction | Building Construction | 1/1/2022 | 12/30/2022 | 5 | 260 |
| 5 | Paving | Paving | 1/1/2022 | 12/30/2022 | 5 | 260 |
| 6 | Architectural Coating | Architectural Coating | 1/1/2022 | 12/30/2022 | 5 | 260 |

**Acres of Grading (Site Preparation Phase): 390**

**Acres of Grading (Grading Phase): 780**

**Acres of Paving: 0**

**Residential Indoor: 6,131,700; Residential Outdoor: 2,043,900; Non-Residential Indoor: 443,630; Non-Residential Outdoor: 147,877; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | |
|---|---|---|---|---|---|
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 2,276.00 | 372.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 455.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

## 3.2 Demolition - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.3431 | 3.3435 | 2.6772 | 5.0500e-003 | | 0.1615 | 0.1615 | | 0.1502 | 0.1502 | 0.0000 | 441.8730 | 441.8730 | 0.1241 | 0.0000 | 444.9759 |
| **Total** | **0.3431** | **3.3435** | **2.6772** | **5.0500e-003** | | **0.1615** | **0.1615** | | **0.1502** | **0.1502** | **0.0000** | **441.8730** | **441.8730** | **0.1241** | **0.0000** | **444.9759** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.3431 | 3.3435 | 2.6772 | 5.0500e-003 | | 0.1615 | 0.1615 | | 0.1502 | 0.1502 | 0.0000 | 441.8724 | 441.8724 | 0.1241 | 0.0000 | 444.9754 |
| **Total** | **0.3431** | **3.3435** | **2.6772** | **5.0500e-003** | | **0.1615** | **0.1615** | | **0.1502** | **0.1502** | **0.0000** | **441.8724** | **441.8724** | **0.1241** | **0.0000** | **444.9754** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

### 3.3 Site Preparation - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 2.5554 | 0.0000 | 2.5554 | 1.3133 | 0.0000 | 1.3133 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.4121 | 4.3009 | 2.5607 | 4.9500e-003 | | 0.2096 | 0.2096 | | 0.1929 | 0.1929 | 0.0000 | 434.7121 | 434.7121 | 0.1406 | 0.0000 | 438.2270 |
| **Total** | **0.4121** | **4.3009** | **2.5607** | **4.9500e-003** | **2.5554** | **0.2096** | **2.7650** | **1.3133** | **0.1929** | **1.5062** | **0.0000** | **434.7121** | **434.7121** | **0.1406** | **0.0000** | **438.2270** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.0200e-003 | 6.6800e-003 | 0.0869 | 2.3000e-004 | 0.0256 | 1.7000e-004 | 0.0258 | 6.8100e-003 | 1.5000e-004 | 6.9600e-003 | 0.0000 | 21.2254 | 21.2254 | 6.1000e-004 | 5.8000e-004 | 21.4123 |
| **Total** | **8.0200e-003** | **6.6800e-003** | **0.0869** | **2.3000e-004** | **0.0256** | **1.7000e-004** | **0.0258** | **6.8100e-003** | **1.5000e-004** | **6.9600e-003** | **0.0000** | **21.2254** | **21.2254** | **6.1000e-004** | **5.8000e-004** | **21.4123** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 1.1499 | 0.0000 | 1.1499 | 0.5910 | 0.0000 | 0.5910 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.4121 | 4.3009 | 2.5607 | 4.9500e-003 | | 0.2096 | 0.2096 | | 0.1929 | 0.1929 | 0.0000 | 434.7116 | 434.7116 | 0.1406 | 0.0000 | 438.2264 |
| **Total** | **0.4121** | **4.3009** | **2.5607** | **4.9500e-003** | **1.1499** | **0.2096** | **1.3596** | **0.5910** | **0.1929** | **0.7839** | **0.0000** | **434.7116** | **434.7116** | **0.1406** | **0.0000** | **438.2264** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.0200e-003 | 6.6800e-003 | 0.0869 | 2.3000e-004 | 0.0256 | 1.7000e-004 | 0.0258 | 6.8100e-003 | 1.5000e-004 | 6.9600e-003 | 0.0000 | 21.2254 | 21.2254 | 6.1000e-004 | 5.8000e-004 | 21.4123 |
| **Total** | **8.0200e-003** | **6.6800e-003** | **0.0869** | **2.3000e-004** | **0.0256** | **1.7000e-004** | **0.0258** | **6.8100e-003** | **1.5000e-004** | **6.9600e-003** | **0.0000** | **21.2254** | **21.2254** | **6.1000e-004** | **5.8000e-004** | **21.4123** |

### 3.4 Grading - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 1.1965 | 0.0000 | 1.1965 | 0.4750 | 0.0000 | 0.4750 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.4712 | 5.0497 | 3.7754 | 8.0700e-003 | | 0.2125 | 0.2125 | | 0.1955 | 0.1955 | 0.0000 | 708.9498 | 708.9498 | 0.2293 | 0.0000 | 714.6820 |
| **Total** | **0.4712** | **5.0497** | **3.7754** | **8.0700e-003** | **1.1965** | **0.2125** | **1.4090** | **0.4750** | **0.1955** | **0.6705** | **0.0000** | **708.9498** | **708.9498** | **0.2293** | **0.0000** | **714.6820** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.9100e-003 | 7.4200e-003 | 0.0965 | 2.6000e-004 | 0.0285 | 1.9000e-004 | 0.0287 | 7.5700e-003 | 1.7000e-004 | 7.7400e-003 | 0.0000 | 23.5838 | 23.5838 | 6.7000e-004 | 6.4000e-004 | 23.7915 |
| **Total** | **8.9100e-003** | **7.4200e-003** | **0.0965** | **2.6000e-004** | **0.0285** | **1.9000e-004** | **0.0287** | **7.5700e-003** | **1.7000e-004** | **7.7400e-003** | **0.0000** | **23.5838** | **23.5838** | **6.7000e-004** | **6.4000e-004** | **23.7915** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.5384 | 0.0000 | 0.5384 | 0.2137 | 0.0000 | 0.2137 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.4712 | 5.0497 | 3.7754 | 8.0700e-003 | | 0.2125 | 0.2125 | | 0.1955 | 0.1955 | 0.0000 | 708.9490 | 708.9490 | 0.2293 | 0.0000 | 714.6812 |
| **Total** | **0.4712** | **5.0497** | **3.7754** | **8.0700e-003** | **0.5384** | **0.2125** | **0.7510** | **0.2137** | **0.1955** | **0.4093** | **0.0000** | **708.9490** | **708.9490** | **0.2293** | **0.0000** | **714.6812** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.9100e-003 | 7.4200e-003 | 0.0965 | 2.6000e-004 | 0.0285 | 1.9000e-004 | 0.0287 | 7.5700e-003 | 1.7000e-004 | 7.7400e-003 | 0.0000 | 23.5838 | 23.5838 | 6.7000e-004 | 6.4000e-004 | 23.7915 |
| **Total** | **8.9100e-003** | **7.4200e-003** | **0.0965** | **2.6000e-004** | **0.0285** | **1.9000e-004** | **0.0287** | **7.5700e-003** | **1.7000e-004** | **7.7400e-003** | **0.0000** | **23.5838** | **23.5838** | **6.7000e-004** | **6.4000e-004** | **23.7915** |

### 3.5 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2218 | 2.0300 | 2.1272 | 3.5000e-003 | | 0.1052 | 0.1052 | | 0.0990 | 0.0990 | 0.0000 | 301.2428 | 301.2428 | 0.0722 | 0.0000 | 303.0471 |
| **Total** | **0.2218** | **2.0300** | **2.1272** | **3.5000e-003** | | **0.1052** | **0.1052** | | **0.0990** | **0.0990** | **0.0000** | **301.2428** | **301.2428** | **0.0722** | **0.0000** | **303.0471** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0944 | 2.4868 | 0.8248 | 9.4700e-003 | 0.3048 | 0.0226 | 0.3274 | 0.0880 | 0.0216 | 0.1096 | 0.0000 | 923.4726 | 923.4726 | 0.0308 | 0.1332 | 963.9394 |
| Worker | 1.0139 | 0.8448 | 10.9845 | 0.0291 | 3.2423 | 0.0212 | 3.2635 | 0.8611 | 0.0195 | 0.8807 | 0.0000 | 2,683.8386 | 2,683.8386 | 0.0765 | 0.0729 | 2,707.4699 |
| **Total** | **1.1083** | **3.3316** | **11.8093** | **0.0386** | **3.5470** | **0.0438** | **3.5908** | **0.9491** | **0.0411** | **0.9903** | **0.0000** | **3,607.3112** | **3,607.3112** | **0.1074** | **0.2061** | **3,671.4093** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2218 | 2.0300 | 2.1272 | 3.5000e-003 | | 0.1052 | 0.1052 | | 0.0990 | 0.0990 | 0.0000 | 301.2425 | 301.2425 | 0.0722 | 0.0000 | 303.0467 |
| **Total** | **0.2218** | **2.0300** | **2.1272** | **3.5000e-003** | | **0.1052** | **0.1052** | | **0.0990** | **0.0990** | **0.0000** | **301.2425** | **301.2425** | **0.0722** | **0.0000** | **303.0467** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0944 | 2.4868 | 0.8248 | 9.4700e-003 | 0.3048 | 0.0226 | 0.3274 | 0.0880 | 0.0216 | 0.1096 | 0.0000 | 923.4726 | 923.4726 | 0.0308 | 0.1332 | 963.9394 |
| Worker | 1.0139 | 0.8448 | 10.9845 | 0.0291 | 3.2423 | 0.0212 | 3.2635 | 0.8611 | 0.0195 | 0.8807 | 0.0000 | 2,683.8386 | 2,683.8386 | 0.0765 | 0.0729 | 2,707.4699 |
| **Total** | **1.1083** | **3.3316** | **11.8093** | **0.0386** | **3.5470** | **0.0438** | **3.5908** | **0.9491** | **0.0411** | **0.9903** | **0.0000** | **3,607.3112** | **3,607.3112** | **0.1074** | **0.2061** | **3,671.4093** |

### 3.6 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1434 | 1.4462 | 1.8955 | 2.9600e-003 | | 0.0738 | 0.0738 | | 0.0679 | 0.0679 | 0.0000 | 260.3583 | 260.3583 | 0.0842 | 0.0000 | 262.4634 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.1434** | **1.4462** | **1.8955** | **2.9600e-003** | | **0.0738** | **0.0738** | | **0.0679** | **0.0679** | **0.0000** | **260.3583** | **260.3583** | **0.0842** | **0.0000** | **262.4634** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1434 | 1.4462 | 1.8955 | 2.9600e-003 | | 0.0738 | 0.0738 | | 0.0679 | 0.0679 | 0.0000 | 260.3579 | 260.3579 | 0.0842 | 0.0000 | 262.4631 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.1434** | **1.4462** | **1.8955** | **2.9600e-003** | | **0.0738** | **0.0738** | | **0.0679** | **0.0679** | **0.0000** | **260.3579** | **260.3579** | **0.0842** | **0.0000** | **262.4631** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

### 3.7 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 10.8443 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0266 | 0.1831 | 0.2358 | 3.9000e-004 | | 0.0106 | 0.0106 | | 0.0106 | 0.0106 | 0.0000 | 33.1923 | 33.1923 | 2.1600e-003 | 0.0000 | 33.2463 |
| **Total** | **10.8709** | **0.1831** | **0.2358** | **3.9000e-004** | | **0.0106** | **0.0106** | | **0.0106** | **0.0106** | **0.0000** | **33.1923** | **33.1923** | **2.1600e-003** | **0.0000** | **33.2463** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 3.7 Architectural Coating - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.2027 | 0.1689 | 2.1959 | 5.8100e-003 | 0.6482 | 4.2400e-003 | 0.6524 | 0.1722 | 3.9000e-003 | 0.1761 | 0.0000 | 536.5319 | 536.5319 | 0.0153 | 0.0146 | 541.2561 |
| **Total** | **0.2027** | **0.1689** | **2.1959** | **5.8100e-003** | **0.6482** | **4.2400e-003** | **0.6524** | **0.1722** | **3.9000e-003** | **0.1761** | **0.0000** | **536.5319** | **536.5319** | **0.0153** | **0.0146** | **541.2561** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 10.8443 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0266 | 0.1831 | 0.2358 | 3.9000e-004 | | 0.0106 | 0.0106 | | 0.0106 | 0.0106 | 0.0000 | 33.1923 | 33.1923 | 2.1600e-003 | 0.0000 | 33.2463 |
| **Total** | **10.8709** | **0.1831** | **0.2358** | **3.9000e-004** | | **0.0106** | **0.0106** | | **0.0106** | **0.0106** | **0.0000** | **33.1923** | **33.1923** | **2.1600e-003** | **0.0000** | **33.2463** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.7 Architectural Coating - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.2027 | 0.1689 | 2.1959 | 5.8100e-003 | 0.6482 | 4.2400e-003 | 0.6524 | 0.1722 | 3.9000e-003 | 0.1761 | 0.0000 | 536.5319 | 536.5319 | 0.0153 | 0.0146 | 541.2561 |
| **Total** | **0.2027** | **0.1689** | **2.1959** | **5.8100e-003** | **0.6482** | **4.2400e-003** | **0.6524** | **0.1722** | **3.9000e-003** | **0.1761** | **0.0000** | **536.5319** | **536.5319** | **0.0153** | **0.0146** | **541.2561** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Total | 0.00 | 0.00 | 0.00 | | |

## 4.3 Trip Type Information

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| High Turnover (Sit Down Restaurant) | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Office Park | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

FFTOD Specific Plan: Construction - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| Unmitigated | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 12.0104 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 0.9307 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | | **0.1732** | **0.1732** | | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 12.0104 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 0.9307 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | | **0.1732** | **0.1732** | | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

### 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan: Construction - Mitigated

**Los Angeles-South Coast County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 2,699.00 | Dwelling Unit | 45.00 | 2,699,000.00 | 10524 |
| Strip Mall | 250.56 | 1000sqft | 0.00 | 250,559.33 | 0 |
| Office Park | 23.74 | 1000sqft | 0.00 | 23,737.97 | 0 |
| Apartments Mid Rise | 163.00 | Dwelling Unit | 13.43 | 163,000.00 | 636 |
| Strip Mall | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| High Turnover (Sit Down Restaurant) | 3.62 | 1000sqft | 0.00 | 3,623.80 | 0 |
| Apartments Mid Rise | 75.00 | Dwelling Unit | 6.11 | 75,000.00 | 293 |
| Apartments Mid Rise | 15.00 | Dwelling Unit | 17.38 | 15,000.00 | 59 |
| Office Park | 3.29 | 1000sqft | 0.00 | 3,291.82 | 0 |
| Apartments Mid Rise | 40.00 | Dwelling Unit | 68.77 | 40,000.00 | 154 |
| High Turnover (Sit Down Restaurant) | 10.42 | 1000sqft | 0.00 | 10,421.72 | 0 |
| Apartments Low Rise | 36.00 | Dwelling Unit | 75.81 | 36,000.00 | 140 |
| Office Park | 0.49 | 1000sqft | 0.00 | 494.76 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Project Characteristics -

Land Use - Proposed land use types and acreages per SP and info on SF to LU. Maximum estimate of 25% of land uses constructed in a single year.

Construction Phase - During maximum development scenario year, all phases of construction could overlap in time throughout the Specific Plan area.

Off-road Equipment - Construction equipment from CalEEMod defaults.

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Grading - Default acres graded.

Trips and VMT - Construction trips from CalEEMod defaults.

Architectural Coating - Use of super-compliant VOC paints as mitigation (<10 g/L).

Vehicle Trips - Construction-only emissions estimates. Operational values zeroed out.

Woodstoves - Construction-only emissions estimates. Operational values zeroed out.

Area Coating - Construction-only emissions estimates. Operational values zeroed out.

Energy Use - Construction-only emissions estimates. Operational values zeroed out.

Water And Wastewater - Construction-only emissions estimates. Operational values zeroed out.

Solid Waste - Construction-only emissions estimates. Operational values zeroed out.

Construction Off-road Equipment Mitigation - Assumes implementation of SCAQMD Rule 403 for fugitive dust control. Mitigation to include Tier 4 final engines for equipment engines >50 hp.

Area Mitigation - Use of super compliant VOC paint (10 g/L) during construction.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblArchitecturalCoating | EF_Nonresidential_Exterior | 100.00 | 10.00 |
| tblArchitecturalCoating | EF_Nonresidential_Interior | 100.00 | 10.00 |
| tblArchitecturalCoating | EF_Residential_Exterior | 50.00 | 10.00 |
| tblArchitecturalCoating | EF_Residential_Interior | 50.00 | 10.00 |
| tblAreaCoating | Area_Nonresidential_Exterior | 147876 | 0 |
| tblAreaCoating | Area_Nonresidential_Interior | 443629 | 0 |
| tblAreaCoating | Area_Residential_Exterior | 2043900 | 0 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblAreaCoating | Area_Residential_Interior | 6131700 | 0 |
| tblAreaMitigation | UseLowVOCPaintNonresidentialExteriorValue | 100 | 10 |
| tblAreaMitigation | UseLowVOCPaintNonresidentialInteriorValue | 100 | 10 |
| tblAreaMitigation | UseLowVOCPaintResidentialExteriorValue | 50 | 10 |
| tblAreaMitigation | UseLowVOCPaintResidentialInteriorValue | 50 | 10 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 5.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 3.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 6.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 9.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 1.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | NumberOfEquipmentMitigated | 0.00 | 2.00 |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstEquipMitigation | Tier | No Change | Tier 4 Final |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 4,650.00 | 260.00 |
| tblConstructionPhase | NumDays | 300.00 | 260.00 |
| tblConstructionPhase | NumDays | 465.00 | 260.00 |
| tblConstructionPhase | NumDays | 330.00 | 260.00 |
| tblConstructionPhase | NumDays | 180.00 | 260.00 |
| tblConstructionPhase | PhaseEndDate | 6/20/2029 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 12/9/2026 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 8/23/2006 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 2/11/2009 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 3/15/2028 | 12/30/2022 |
| tblConstructionPhase | PhaseEndDate | 5/2/2007 | 12/30/2022 |
| tblConstructionPhase | PhaseStartDate | 3/16/2028 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 2/12/2009 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 6/30/2005 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 5/3/2007 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 12/10/2026 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 8/24/2006 | 1/1/2022 |
| tblEnergyUse | LightingElect | 810.36 | 0.00 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 7.87 | 0.00 |
| tblEnergyUse | LightingElect | 3.74 | 0.00 |
| tblEnergyUse | LightingElect | 6.26 | 0.00 |
| tblEnergyUse | NT24E | 3,172.76 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblEnergyUse | NT24E | 28.16 | 0.00 |
| tblEnergyUse | NT24E | 4.79 | 0.00 |
| tblEnergyUse | NT24E | 3.23 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 187.78 | 0.00 |
| tblEnergyUse | NT24NG | 0.19 | 0.00 |
| tblEnergyUse | NT24NG | 0.49 | 0.00 |
| tblEnergyUse | T24E | 28.76 | 0.00 |
| tblEnergyUse | T24E | 35.05 | 0.00 |
| tblEnergyUse | T24E | 7.24 | 0.00 |
| tblEnergyUse | T24E | 5.01 | 0.00 |
| tblEnergyUse | T24E | 3.58 | 0.00 |
| tblEnergyUse | T24NG | 8,848.67 | 0.00 |
| tblEnergyUse | T24NG | 4,179.80 | 0.00 |
| tblEnergyUse | T24NG | 42.55 | 0.00 |
| tblEnergyUse | T24NG | 9.50 | 0.00 |
| tblEnergyUse | T24NG | 1.14 | 0.00 |
| tblFireplaces | NumberGas | 30.60 | 0.00 |
| tblFireplaces | NumberGas | 2,543.20 | 0.00 |
| tblFireplaces | NumberWood | 1.80 | 0.00 |
| tblFireplaces | NumberWood | 149.60 | 0.00 |
| tblLandUse | LandUseSquareFeet | 250,559.00 | 250,559.33 |
| tblLandUse | LandUseSquareFeet | 23,738.00 | 23,737.97 |
| tblLandUse | LandUseSquareFeet | 10,421.70 | 10,421.72 |
| tblLandUse | LotAcreage | 71.03 | 45.00 |
| tblLandUse | LotAcreage | 5.75 | 0.00 |
| tblLandUse | LotAcreage | 0.54 | 0.00 |
| tblLandUse | LotAcreage | 4.29 | 13.43 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.97 | 6.11 |
| tblLandUse | LotAcreage | 0.39 | 17.38 |
| tblLandUse | LotAcreage | 0.08 | 0.00 |
| tblLandUse | LotAcreage | 1.05 | 68.77 |
| tblLandUse | LotAcreage | 0.24 | 0.00 |
| tblLandUse | LotAcreage | 2.25 | 75.81 |
| tblLandUse | LotAcreage | 0.01 | 0.00 |
| tblLandUse | Population | 7,719.00 | 10,524.00 |
| tblLandUse | Population | 466.00 | 636.00 |
| tblLandUse | Population | 215.00 | 293.00 |
| tblLandUse | Population | 43.00 | 59.00 |
| tblLandUse | Population | 114.00 | 154.00 |
| tblLandUse | Population | 103.00 | 140.00 |
| tblSolidWaste | SolidWasteGenerationRate | 16.56 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 1,376.32 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 167.20 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 25.59 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 266.89 | 0.00 |
| tblVehicleTrips | ST_TR | 8.14 | 0.00 |
| tblVehicleTrips | ST_TR | 4.91 | 0.00 |
| tblVehicleTrips | ST_TR | 122.40 | 0.00 |
| tblVehicleTrips | ST_TR | 1.64 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 0.00 |
| tblVehicleTrips | SU_TR | 6.28 | 0.00 |
| tblVehicleTrips | SU_TR | 4.09 | 0.00 |
| tblVehicleTrips | SU_TR | 142.64 | 0.00 |
| tblVehicleTrips | SU_TR | 0.76 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblVehicleTrips | SU_TR | 20.43 | 0.00 |
| tblVehicleTrips | WD_TR | 7.32 | 0.00 |
| tblVehicleTrips | WD_TR | 5.44 | 0.00 |
| tblVehicleTrips | WD_TR | 112.18 | 0.00 |
| tblVehicleTrips | WD_TR | 11.07 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 0.00 |
| tblWater | IndoorWaterUseRate | 2,345,544.92 | 0.00 |
| tblWater | IndoorWaterUseRate | 194,940,844.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,264,648.66 | 0.00 |
| tblWater | IndoorWaterUseRate | 4,891,232.74 | 0.00 |
| tblWater | IndoorWaterUseRate | 18,827,753.51 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,478,713.10 | 0.00 |
| tblWater | OutdoorWaterUseRate | 122,897,489.02 | 0.00 |
| tblWater | OutdoorWaterUseRate | 272,211.62 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,997,852.33 | 0.00 |
| tblWater | OutdoorWaterUseRate | 11,539,590.86 | 0.00 |
| tblWoodstoves | NumberCatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberCatalytic | 149.60 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 1.80 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 149.60 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 4.9913 | 19.8791 | 27.6052 | 0.0702 | 8.0439 | 0.8220 | 8.8659 | 2.9353 | 0.7617 | 3.6970 | 0.0000 | 6,404.3562 | 6,404.3562 | 0.7775 | 0.2228 | 6,490.1980 |
| **Maximum** | **4.9913** | **19.8791** | **27.6052** | **0.0702** | **8.0439** | **0.8220** | **8.8659** | **2.9353** | **0.7617** | **3.6970** | **0.0000** | **6,404.3562** | **6,404.3562** | **0.7775** | **0.2228** | **6,490.1980** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 3.7059 | 5.0023 | 29.1450 | 0.0702 | 5.9804 | 0.0966 | 6.0770 | 1.9517 | 0.0935 | 2.0452 | 0.0000 | 6,404.3537 | 6,404.3537 | 0.7775 | 0.2228 | 6,490.1954 |
| **Maximum** | **3.7059** | **5.0023** | **29.1450** | **0.0702** | **5.9804** | **0.0966** | **6.0770** | **1.9517** | **0.0935** | **2.0452** | **0.0000** | **6,404.3537** | **6,404.3537** | **0.7775** | **0.2228** | **6,490.1954** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **25.75** | **74.84** | **-5.58** | **0.00** | **25.65** | **88.25** | **31.46** | **33.51** | **87.72** | **44.68** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| 67 | 12-30-2021 | 3-29-2022 | 6.0266 | 2.1192 |
| 68 | 3-30-2022 | 6-29-2022 | 6.2308 | 2.1459 |
| 69 | 6-30-2022 | 9-29-2022 | 6.2293 | 2.1443 |
| | | Highest | 6.2308 | 2.1459 |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 2 | Site Preparation | Site Preparation | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 3 | Grading | Grading | 1/1/2022 | 12/30/2022 | 5 | 260 | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 4 | Building Construction | Building Construction | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 5 | Paving | Paving | 1/1/2022 | 12/30/2022 | 5 | 260 | |
| 6 | Architectural Coating | Architectural Coating | 1/1/2022 | 12/30/2022 | 5 | 260 | |

**Acres of Grading (Site Preparation Phase): 390**

**Acres of Grading (Grading Phase): 780**

**Acres of Paving: 0**

**Residential Indoor: 6,131,700; Residential Outdoor: 2,043,900; Non-Residential Indoor: 443,630; Non-Residential Outdoor: 147,877; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | |
|---|---|---|---|---|---|
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 2,276.00 | 372.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 455.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.3431 | 3.3435 | 2.6772 | 5.0500e-003 | | 0.1615 | 0.1615 | | 0.1502 | 0.1502 | 0.0000 | 441.8730 | 441.8730 | 0.1241 | 0.0000 | 444.9759 |
| **Total** | **0.3431** | **3.3435** | **2.6772** | **5.0500e-003** | | **0.1615** | **0.1615** | | **0.1502** | **0.1502** | **0.0000** | **441.8730** | **441.8730** | **0.1241** | **0.0000** | **444.9759** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Demolition - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0601 | 0.2604 | 3.0264 | 5.0500e-003 | | 8.0100e-003 | 8.0100e-003 | | 8.0100e-003 | 8.0100e-003 | 0.0000 | 441.8724 | 441.8724 | 0.1241 | 0.0000 | 444.9754 |
| **Total** | **0.0601** | **0.2604** | **3.0264** | **5.0500e-003** | | **8.0100e-003** | **8.0100e-003** | | **8.0100e-003** | **8.0100e-003** | **0.0000** | **441.8724** | **441.8724** | **0.1241** | **0.0000** | **444.9754** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 2.5554 | 0.0000 | 2.5554 | 1.3133 | 0.0000 | 1.3133 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.4121 | 4.3009 | 2.5607 | 4.9500e-003 | | 0.2096 | 0.2096 | | 0.1929 | 0.1929 | 0.0000 | 434.7121 | 434.7121 | 0.1406 | 0.0000 | 438.2270 |
| **Total** | **0.4121** | **4.3009** | **2.5607** | **4.9500e-003** | **2.5554** | **0.2096** | **2.7650** | **1.3133** | **0.1929** | **1.5062** | **0.0000** | **434.7121** | **434.7121** | **0.1406** | **0.0000** | **438.2270** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.0200e-003 | 6.6800e-003 | 0.0869 | 2.3000e-004 | 0.0256 | 1.7000e-004 | 0.0258 | 6.8100e-003 | 1.5000e-004 | 6.9600e-003 | 0.0000 | 21.2254 | 21.2254 | 6.1000e-004 | 5.8000e-004 | 21.4123 |
| **Total** | **8.0200e-003** | **6.6800e-003** | **0.0869** | **2.3000e-004** | **0.0256** | **1.7000e-004** | **0.0258** | **6.8100e-003** | **1.5000e-004** | **6.9600e-003** | **0.0000** | **21.2254** | **21.2254** | **6.1000e-004** | **5.8000e-004** | **21.4123** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Site Preparation - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 1.1499 | 0.0000 | 1.1499 | 0.5910 | 0.0000 | 0.5910 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0605 | 0.2623 | 2.7130 | 4.9500e-003 | | 8.0700e-003 | 8.0700e-003 | | 8.0700e-003 | 8.0700e-003 | 0.0000 | 434.7116 | 434.7116 | 0.1406 | 0.0000 | 438.2264 |
| **Total** | **0.0605** | **0.2623** | **2.7130** | **4.9500e-003** | **1.1499** | **8.0700e-003** | **1.1580** | **0.5910** | **8.0700e-003** | **0.5991** | **0.0000** | **434.7116** | **434.7116** | **0.1406** | **0.0000** | **438.2264** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.0200e-003 | 6.6800e-003 | 0.0869 | 2.3000e-004 | 0.0256 | 1.7000e-004 | 0.0258 | 6.8100e-003 | 1.5000e-004 | 6.9600e-003 | 0.0000 | 21.2254 | 21.2254 | 6.1000e-004 | 5.8000e-004 | 21.4123 |
| **Total** | **8.0200e-003** | **6.6800e-003** | **0.0869** | **2.3000e-004** | **0.0256** | **1.7000e-004** | **0.0258** | **6.8100e-003** | **1.5000e-004** | **6.9600e-003** | **0.0000** | **21.2254** | **21.2254** | **6.1000e-004** | **5.8000e-004** | **21.4123** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 1.1965 | 0.0000 | 1.1965 | 0.4750 | 0.0000 | 0.4750 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.4712 | 5.0497 | 3.7754 | 8.0700e-003 | | 0.2125 | 0.2125 | | 0.1955 | 0.1955 | 0.0000 | 708.9498 | 708.9498 | 0.2293 | 0.0000 | 714.6820 |
| **Total** | **0.4712** | **5.0497** | **3.7754** | **8.0700e-003** | **1.1965** | **0.2125** | **1.4090** | **0.4750** | **0.1955** | **0.6705** | **0.0000** | **708.9498** | **708.9498** | **0.2293** | **0.0000** | **714.6820** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.9100e-003 | 7.4200e-003 | 0.0965 | 2.6000e-004 | 0.0285 | 1.9000e-004 | 0.0287 | 7.5700e-003 | 1.7000e-004 | 7.7400e-003 | 0.0000 | 23.5838 | 23.5838 | 6.7000e-004 | 6.4000e-004 | 23.7915 |
| **Total** | **8.9100e-003** | **7.4200e-003** | **0.0965** | **2.6000e-004** | **0.0285** | **1.9000e-004** | **0.0287** | **7.5700e-003** | **1.7000e-004** | **7.7400e-003** | **0.0000** | **23.5838** | **23.5838** | **6.7000e-004** | **6.4000e-004** | **23.7915** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.4 Grading - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.5384 | 0.0000 | 0.5384 | 0.2137 | 0.0000 | 0.2137 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0990 | 0.4290 | 4.2899 | 8.0700e-003 | | 0.0132 | 0.0132 | | 0.0132 | 0.0132 | 0.0000 | 708.9490 | 708.9490 | 0.2293 | 0.0000 | 714.6812 |
| **Total** | **0.0990** | **0.4290** | **4.2899** | **8.0700e-003** | **0.5384** | **0.0132** | **0.5516** | **0.2137** | **0.0132** | **0.2269** | **0.0000** | **708.9490** | **708.9490** | **0.2293** | **0.0000** | **714.6812** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 8.9100e-003 | 7.4200e-003 | 0.0965 | 2.6000e-004 | 0.0285 | 1.9000e-004 | 0.0287 | 7.5700e-003 | 1.7000e-004 | 7.7400e-003 | 0.0000 | 23.5838 | 23.5838 | 6.7000e-004 | 6.4000e-004 | 23.7915 |
| **Total** | **8.9100e-003** | **7.4200e-003** | **0.0965** | **2.6000e-004** | **0.0285** | **1.9000e-004** | **0.0287** | **7.5700e-003** | **1.7000e-004** | **7.7400e-003** | **0.0000** | **23.5838** | **23.5838** | **6.7000e-004** | **6.4000e-004** | **23.7915** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 3.5 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.2218 | 2.0300 | 2.1272 | 3.5000e-003 | | 0.1052 | 0.1052 | | 0.0990 | 0.0990 | 0.0000 | 301.2428 | 301.2428 | 0.0722 | 0.0000 | 303.0471 |
| **Total** | **0.2218** | **2.0300** | **2.1272** | **3.5000e-003** | | **0.1052** | **0.1052** | | **0.0990** | **0.0990** | **0.0000** | **301.2428** | **301.2428** | **0.0722** | **0.0000** | **303.0471** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0944 | 2.4868 | 0.8248 | 9.4700e-003 | 0.3048 | 0.0226 | 0.3274 | 0.0880 | 0.0216 | 0.1096 | 0.0000 | 923.4726 | 923.4726 | 0.0308 | 0.1332 | 963.9394 |
| Worker | 1.0139 | 0.8448 | 10.9845 | 0.0291 | 3.2423 | 0.0212 | 3.2635 | 0.8611 | 0.0195 | 0.8807 | 0.0000 | 2,683.8386 | 2,683.8386 | 0.0765 | 0.0729 | 2,707.4699 |
| **Total** | **1.1083** | **3.3316** | **11.8093** | **0.0386** | **3.5470** | **0.0438** | **3.5908** | **0.9491** | **0.0411** | **0.9903** | **0.0000** | **3,607.3112** | **3,607.3112** | **0.1074** | **0.2061** | **3,671.4093** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.5 Building Construction - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0729 | 0.3502 | 2.2957 | 3.5000e-003 | | 0.0132 | 0.0132 | | 0.0132 | 0.0132 | 0.0000 | 301.2425 | 301.2425 | 0.0722 | 0.0000 | 303.0467 |
| **Total** | **0.0729** | **0.3502** | **2.2957** | **3.5000e-003** | | **0.0132** | **0.0132** | | **0.0132** | **0.0132** | **0.0000** | **301.2425** | **301.2425** | **0.0722** | **0.0000** | **303.0467** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0944 | 2.4868 | 0.8248 | 9.4700e-003 | 0.3048 | 0.0226 | 0.3274 | 0.0880 | 0.0216 | 0.1096 | 0.0000 | 923.4726 | 923.4726 | 0.0308 | 0.1332 | 963.9394 |
| Worker | 1.0139 | 0.8448 | 10.9845 | 0.0291 | 3.2423 | 0.0212 | 3.2635 | 0.8611 | 0.0195 | 0.8807 | 0.0000 | 2,683.8386 | 2,683.8386 | 0.0765 | 0.0729 | 2,707.4699 |
| **Total** | **1.1083** | **3.3316** | **11.8093** | **0.0386** | **3.5470** | **0.0438** | **3.5908** | **0.9491** | **0.0411** | **0.9903** | **0.0000** | **3,607.3112** | **3,607.3112** | **0.1074** | **0.2061** | **3,671.4093** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1434 | 1.4462 | 1.8955 | 2.9600e-003 | | 0.0738 | 0.0738 | | 0.0679 | 0.0679 | 0.0000 | 260.3583 | 260.3583 | 0.0842 | 0.0000 | 262.4634 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.1434** | **1.4462** | **1.8955** | **2.9600e-003** | | **0.0738** | **0.0738** | | **0.0679** | **0.0679** | **0.0000** | **260.3583** | **260.3583** | **0.0842** | **0.0000** | **262.4634** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.6 Paving - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0365 | 0.1580 | 2.2484 | 2.9600e-003 | | 4.8600e-003 | 4.8600e-003 | | 4.8600e-003 | 4.8600e-003 | 0.0000 | 260.3579 | 260.3579 | 0.0842 | 0.0000 | 262.4631 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0365** | **0.1580** | **2.2484** | **2.9600e-003** | | **4.8600e-003** | **4.8600e-003** | | **4.8600e-003** | **4.8600e-003** | **0.0000** | **260.3579** | **260.3579** | **0.0842** | **0.0000** | **262.4631** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 6.6800e-003 | 5.5700e-003 | 0.0724 | 1.9000e-004 | 0.0214 | 1.4000e-004 | 0.0215 | 5.6800e-003 | 1.3000e-004 | 5.8000e-003 | 0.0000 | 17.6879 | 17.6879 | 5.0000e-004 | 4.8000e-004 | 17.8436 |
| **Total** | **6.6800e-003** | **5.5700e-003** | **0.0724** | **1.9000e-004** | **0.0214** | **1.4000e-004** | **0.0215** | **5.6800e-003** | **1.3000e-004** | **5.8000e-003** | **0.0000** | **17.6879** | **17.6879** | **5.0000e-004** | **4.8000e-004** | **17.8436** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.7 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 2.0318 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0266 | 0.1831 | 0.2358 | 3.9000e-004 | | 0.0106 | 0.0106 | | 0.0106 | 0.0106 | 0.0000 | 33.1923 | 33.1923 | 2.1600e-003 | 0.0000 | 33.2463 |
| **Total** | **2.0584** | **0.1831** | **0.2358** | **3.9000e-004** | | **0.0106** | **0.0106** | | **0.0106** | **0.0106** | **0.0000** | **33.1923** | **33.1923** | **2.1600e-003** | **0.0000** | **33.2463** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.2027 | 0.1689 | 2.1959 | 5.8100e-003 | 0.6482 | 4.2400e-003 | 0.6524 | 0.1722 | 3.9000e-003 | 0.1761 | 0.0000 | 536.5319 | 536.5319 | 0.0153 | 0.0146 | 541.2561 |
| **Total** | **0.2027** | **0.1689** | **2.1959** | **5.8100e-003** | **0.6482** | **4.2400e-003** | **0.6524** | **0.1722** | **3.9000e-003** | **0.1761** | **0.0000** | **536.5319** | **536.5319** | **0.0153** | **0.0146** | **541.2561** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.7 Architectural Coating - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 2.0318 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 3.8600e-003 | 0.0167 | 0.2382 | 3.9000e-004 | | 5.2000e-004 | 5.2000e-004 | | 5.2000e-004 | 5.2000e-004 | 0.0000 | 33.1923 | 33.1923 | 2.1600e-003 | 0.0000 | 33.2463 |
| **Total** | **2.0356** | **0.0167** | **0.2382** | **3.9000e-004** | | **5.2000e-004** | **5.2000e-004** | | **5.2000e-004** | **5.2000e-004** | **0.0000** | **33.1923** | **33.1923** | **2.1600e-003** | **0.0000** | **33.2463** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.2027 | 0.1689 | 2.1959 | 5.8100e-003 | 0.6482 | 4.2400e-003 | 0.6524 | 0.1722 | 3.9000e-003 | 0.1761 | 0.0000 | 536.5319 | 536.5319 | 0.0153 | 0.0146 | 541.2561 |
| **Total** | **0.2027** | **0.1689** | **2.1959** | **5.8100e-003** | **0.6482** | **4.2400e-003** | **0.6524** | **0.1722** | **3.9000e-003** | **0.1761** | **0.0000** | **536.5319** | **536.5319** | **0.0153** | **0.0146** | **541.2561** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Total | 0.00 | 0.00 | 0.00 | | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| High Turnover (Sit Down Restaurant) | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Office Park | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

FFTOD Specific Plan: Construction - Mitigated - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Residential Exterior

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| Unmitigated | 12.9411 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 12.0104 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 0.9307 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | | **0.1732** | **0.1732** | | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 12.0104 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 0.9307 | 0.3590 | 31.1207 | 1.6500e-003 | | 0.1732 | 0.1732 | | 0.1732 | 0.1732 | 0.0000 | 51.0157 | 51.0157 | 0.0486 | 0.0000 | 52.2301 |
| **Total** | **12.9411** | **0.3590** | **31.1207** | **1.6500e-003** | | **0.1732** | **0.1732** | | **0.1732** | **0.1732** | **0.0000** | **51.0157** | **51.0157** | **0.0486** | **0.0000** | **52.2301** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| High Turnover (Sit Down Restaurant) | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Office Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan Operations - Buildout

**Los Angeles-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 10,794.00 | Dwelling Unit | 181.00 | 10,794,000.00 | 42097 |
| Strip Mall | 1,002.24 | 1000sqft | 0.00 | 1,002,237.32 | 0 |
| Office Park | 94.95 | 1000sqft | 0.00 | 94,951.88 | 0 |
| Apartments Mid Rise | 652.00 | Dwelling Unit | 53.71 | 652,000.00 | 2543 |
| Apartments Mid Rise | 301.00 | Dwelling Unit | 24.44 | 301,000.00 | 1174 |
| Strip Mall | 14.50 | 1000sqft | 0.00 | 14,495.18 | 0 |
| High Turnover (Sit Down Restaurant) | 14.50 | 1000sqft | 0.00 | 14,495.18 | 0 |
| Apartments Mid Rise | 158.00 | Dwelling Unit | 275.09 | 158,000.00 | 616 |
| High Turnover (Sit Down Restaurant) | 41.69 | 1000sqft | 0.00 | 41,686.89 | 0 |
| Apartments Low Rise | 144.00 | Dwelling Unit | 303.25 | 144,000.00 | 562 |
| Office Park | 1.98 | 1000sqft | 0.00 | 1,979.05 | 0 |
| Apartments Mid Rise | 61.00 | Dwelling Unit | 69.51 | 61,000.00 | 238 |
| Office Park | 13.17 | 1000sqft | 0.00 | 13,167.29 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Project Characteristics -

Land Use - Proposed land use types and acreages per Specific Plan with ratio assumptions for LU to SF at buildout.

Construction Phase - Operational only run. Construction phases entered as placeholders.

Off-road Equipment - Operational only run. Construction phases entered as placeholders.

Off-road Equipment - Operational only run. Construction phases entered as placeholders.

Trips and VMT - Operational only run.

Architectural Coating - Operational only run.

Vehicle Trips - Project trips and lengths adjusted to match the Fehr & Peers traffic numbers. All Vehicles (non-trucks) entered in residential land use, trucks entered in retail land use.

Woodstoves - No wood-burning devices per SCAQMD Rule 445.

Area Mitigation -

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblArchitecturalCoating | ConstArea_Nonresidential_Exterior | 591,506.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Nonresidential_Interior | 1,774,519.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Exterior | 8,174,250.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Interior | 24,522,750.00 | 0.00 |
| tblConstructionPhase | NumDays | 1,100.00 | 1.00 |
| tblConstructionPhase | NumDays | 1,100.00 | 1.00 |
| tblConstructionPhase | PhaseEndDate | 12/1/2084 | 1/3/2022 |
| tblConstructionPhase | PhaseEndDate | 9/13/2080 | 1/3/2022 |
| tblConstructionPhase | PhaseStartDate | 9/14/2080 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 6/27/2076 | 1/1/2022 |
| tblFireplaces | NumberGas | 122.40 | 129.60 |
| tblFireplaces | NumberGas | 10,171.10 | 10,769.40 |
| tblFireplaces | NumberWood | 7.20 | 0.00 |
| tblFireplaces | NumberWood | 598.30 | 0.00 |
| tblLandUse | LandUseSquareFeet | 1,002,240.00 | 1,002,237.32 |
| tblLandUse | LandUseSquareFeet | 94,951.90 | 94,951.88 |
| tblLandUse | LandUseSquareFeet | 14,495.20 | 14,495.18 |

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblLandUse | LandUseSquareFeet | 14,495.20 | 14,495.18 |
| tblLandUse | LandUseSquareFeet | 41,686.90 | 41,686.89 |
| tblLandUse | LandUseSquareFeet | 13,167.30 | 13,167.29 |
| tblLandUse | LotAcreage | 284.05 | 181.00 |
| tblLandUse | LotAcreage | 23.01 | 0.00 |
| tblLandUse | LotAcreage | 2.18 | 0.00 |
| tblLandUse | LotAcreage | 17.16 | 53.71 |
| tblLandUse | LotAcreage | 7.92 | 24.44 |
| tblLandUse | LotAcreage | 0.33 | 0.00 |
| tblLandUse | LotAcreage | 0.33 | 0.00 |
| tblLandUse | LotAcreage | 4.16 | 275.09 |
| tblLandUse | LotAcreage | 0.96 | 0.00 |
| tblLandUse | LotAcreage | 9.00 | 303.25 |
| tblLandUse | LotAcreage | 0.05 | 0.00 |
| tblLandUse | LotAcreage | 1.61 | 69.51 |
| tblLandUse | LotAcreage | 0.30 | 0.00 |
| tblLandUse | Population | 30,871.00 | 42,097.00 |
| tblLandUse | Population | 1,865.00 | 2,543.00 |
| tblLandUse | Population | 861.00 | 1,174.00 |
| tblLandUse | Population | 452.00 | 616.00 |
| tblLandUse | Population | 412.00 | 562.00 |
| tblLandUse | Population | 174.00 | 238.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 6.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblTripsAndVMT | WorkerTripNumber | 1,821.00 | 0.00 |
| tblVehicleTrips | ST_TR | 8.14 | 0.00 |
| tblVehicleTrips | ST_TR | 4.91 | 0.00 |
| tblVehicleTrips | ST_TR | 122.40 | 0.00 |
| tblVehicleTrips | ST_TR | 1.64 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 0.00 |
| tblVehicleTrips | SU_TR | 6.28 | 0.00 |
| tblVehicleTrips | SU_TR | 4.09 | 0.00 |
| tblVehicleTrips | SU_TR | 142.64 | 0.00 |
| tblVehicleTrips | SU_TR | 0.76 | 0.00 |
| tblVehicleTrips | SU_TR | 20.43 | 0.00 |
| tblVehicleTrips | WD_TR | 7.32 | 0.00 |
| tblVehicleTrips | WD_TR | 5.44 | 0.00 |
| tblVehicleTrips | WD_TR | 112.18 | 0.00 |
| tblVehicleTrips | WD_TR | 11.07 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 0.00 |
| tblWoodstoves | NumberCatalytic | 7.20 | 0.00 |
| tblWoodstoves | NumberCatalytic | 598.30 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 7.20 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 598.30 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 421.5230 | 906.8637 | 1,376.7100 | 5.7679 | | 77.9331 | 77.9331 | | 77.9331 | 77.9331 | 0.0000 | 1,144,833.1096 | 1,144,833.1096 | 23.6213 | 20.9556 | 1,151,668.4180 |
| Energy | 3.7068 | 31.9286 | 15.3305 | 0.2022 | | 2.5611 | 2.5611 | | 2.5611 | 2.5611 | | 40,437.5978 | 40,437.5978 | 0.7751 | 0.7414 | 40,677.8982 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **425.2298** | **938.7923** | **1,392.0405** | **5.9701** | **0.0000** | **80.4941** | **80.4941** | **0.0000** | **80.4941** | **80.4941** | **0.0000** | **1,185,270.7074** | **1,185,270.7074** | **24.3964** | **21.6970** | **1,192,346.3162** |

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 316.7449 | 11.4872 | 995.6987 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | 0.0000 | 1,799.2273 | 1,799.2273 | 1.7132 | 0.0000 | 1,842.0568 |
| Energy | 3.7068 | 31.9286 | 15.3305 | 0.2022 | | 2.5611 | 2.5611 | | 2.5611 | 2.5611 | | 40,437.5978 | 40,437.5978 | 0.7751 | 0.7414 | 40,677.8982 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **320.4517** | **43.4158** | **1,011.0292** | **0.2550** | **0.0000** | **8.1020** | **8.1020** | **0.0000** | **8.1020** | **8.1020** | **0.0000** | **42,236.8251** | **42,236.8251** | **2.4882** | **0.7414** | **42,519.9550** |

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 24.64 | 95.38 | 27.37 | 95.73 | 0.00 | 89.93 | 89.93 | 0.00 | 89.93 | 89.93 | 0.00 | 96.44 | 96.44 | 89.80 | 96.58 | 96.43 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Paving | Paving | 1/1/2022 | 1/3/2022 | 5 | 1 | |
| 2 | Architectural Coating | Architectural Coating | 1/1/2022 | 1/3/2022 | 5 | 1 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 0 | 0.00 | 78 | 0.48 |
| Paving | Pavers | 0 | 0.00 | 130 | 0.42 |
| Paving | Paving Equipment | 0 | 0.00 | 132 | 0.36 |
| Paving | Rollers | 0 | 0.00 | 80 | 0.38 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Paving | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Architectural Coating | | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Paving - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Paving - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Total | 0.00 | 0.00 | 0.00 | | |

## 4.3 Trip Type Information

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| High Turnover (Sit Down Restaurant) | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Office Park | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 3.7068 | 31.9286 | 15.3305 | 0.2022 | | 2.5611 | 2.5611 | | 2.5611 | 2.5611 | | 40,437.5978 | 40,437.5978 | 0.7751 | 0.7414 | 40,677.8982 |
| NaturalGas Unmitigated | 3.7068 | 31.9286 | 15.3305 | 0.2022 | | 2.5611 | 2.5611 | | 2.5611 | 2.5611 | | 40,437.5978 | 40,437.5978 | 0.7751 | 0.7414 | 40,677.8982 |

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | | lb/day | | | | |
| Apartments Low Rise | 5396.91 | 0.0582 | 0.4974 | 0.2116 | 3.1700e-003 | | 0.0402 | 0.0402 | | 0.0402 | 0.0402 | | 634.9307 | 634.9307 | 0.0122 | 0.0116 | 638.7038 |
| Apartments Mid Rise | 1505.91 | 0.0162 | 0.1388 | 0.0591 | 8.9000e-004 | | 0.0112 | 0.0112 | | 0.0112 | 0.0112 | | 177.1664 | 177.1664 | 3.4000e-003 | 3.2500e-003 | 178.2192 |
| Apartments Mid Rise | 16096 | 0.1736 | 1.4834 | 0.6312 | 9.4700e-003 | | 0.1199 | 0.1199 | | 0.1199 | 0.1199 | | 1,893.6476 | 1,893.6476 | 0.0363 | 0.0347 | 1,904.9006 |
| Apartments Mid Rise | 266473 | 2.8737 | 24.5573 | 10.4499 | 0.1568 | | 1.9855 | 1.9855 | | 1.9855 | 1.9855 | | 31,349.7422 | 31,349.7422 | 0.6009 | 0.5748 | 31,536.0381 |
| Apartments Mid Rise | 3900.57 | 0.0421 | 0.3595 | 0.1530 | 2.2900e-003 | | 0.0291 | 0.0291 | | 0.0291 | 0.0291 | | 458.8901 | 458.8901 | 8.8000e-003 | 8.4100e-003 | 461.6170 |
| Apartments Mid Rise | 7430.82 | 0.0801 | 0.6848 | 0.2914 | 4.3700e-003 | | 0.0554 | 0.0554 | | 0.0554 | 0.0554 | | 874.2146 | 874.2146 | 0.0168 | 0.0160 | 879.4096 |
| High Turnover (Sit Down Restaurant) | 26306.1 | 0.2837 | 2.5790 | 2.1664 | 0.0155 | | 0.1960 | 0.1960 | | 0.1960 | 0.1960 | | 3,094.8401 | 3,094.8401 | 0.0593 | 0.0567 | 3,113.2312 |
| High Turnover (Sit Down Restaurant) | 9147.05 | 0.0986 | 0.8968 | 0.7533 | 5.3800e-003 | | 0.0682 | 0.0682 | | 0.0682 | 0.0682 | | 1,076.1240 | 1,076.1240 | 0.0206 | 0.0197 | 1,082.5189 |
| Office Park | 2520.78 | 0.0272 | 0.2471 | 0.2076 | 1.4800e-003 | | 0.0188 | 0.0188 | | 0.0188 | 0.0188 | | 296.5620 | 296.5620 | 5.6800e-003 | 5.4400e-003 | 298.3244 |
| Office Park | 349.564 | 3.7700e-003 | 0.0343 | 0.0288 | 2.1000e-004 | | 2.6000e-003 | 2.6000e-003 | | 2.6000e-003 | 2.6000e-003 | | 41.1252 | 41.1252 | 7.9000e-004 | 7.5000e-004 | 41.3696 |
| Office Park | 52.5397 | 5.7000e-004 | 5.1500e-003 | 4.3300e-003 | 3.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 6.1811 | 6.1811 | 1.2000e-004 | 1.1000e-004 | 6.2179 |
| Strip Mall | 4475.74 | 0.0483 | 0.4388 | 0.3686 | 2.6300e-003 | | 0.0334 | 0.0334 | | 0.0334 | 0.0334 | | 526.5582 | 526.5582 | 0.0101 | 9.6500e-003 | 529.6873 |
| Strip Mall | 64.7319 | 7.0000e-004 | 6.3500e-003 | 5.3300e-003 | 4.0000e-005 | | 4.8000e-004 | 4.8000e-004 | | 4.8000e-004 | 4.8000e-004 | | 7.6155 | 7.6155 | 1.5000e-004 | 1.4000e-004 | 7.6608 |
| **Total** | | **3.7068** | **31.9286** | **15.3305** | **0.2022** | | **2.5610** | **2.5610** | | **2.5610** | **2.5610** | | **40,437.5978** | **40,437.5978** | **0.7751** | **0.7414** | **40,677.8982** |

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | | lb/day | | | | |
| Apartments Low Rise | 5.39691 | 0.0582 | 0.4974 | 0.2116 | 3.1700e-003 | | 0.0402 | 0.0402 | | 0.0402 | 0.0402 | | 634.9307 | 634.9307 | 0.0122 | 0.0116 | 638.7038 |
| Apartments Mid Rise | 1.50591 | 0.0162 | 0.1388 | 0.0591 | 8.9000e-004 | | 0.0112 | 0.0112 | | 0.0112 | 0.0112 | | 177.1664 | 177.1664 | 3.4000e-003 | 3.2500e-003 | 178.2192 |
| Apartments Mid Rise | 16.096 | 0.1736 | 1.4834 | 0.6312 | 9.4700e-003 | | 0.1199 | 0.1199 | | 0.1199 | 0.1199 | | 1,893.6476 | 1,893.6476 | 0.0363 | 0.0347 | 1,904.9006 |
| Apartments Mid Rise | 266.473 | 2.8737 | 24.5573 | 10.4499 | 0.1568 | | 1.9855 | 1.9855 | | 1.9855 | 1.9855 | | 31,349.7422 | 31,349.7422 | 0.6009 | 0.5748 | 31,536.0381 |
| Apartments Mid Rise | 3.90057 | 0.0421 | 0.3595 | 0.1530 | 2.2900e-003 | | 0.0291 | 0.0291 | | 0.0291 | 0.0291 | | 458.8901 | 458.8901 | 8.8000e-003 | 8.4100e-003 | 461.6170 |
| Apartments Mid Rise | 7.43082 | 0.0801 | 0.6848 | 0.2914 | 4.3700e-003 | | 0.0554 | 0.0554 | | 0.0554 | 0.0554 | | 874.2146 | 874.2146 | 0.0168 | 0.0160 | 879.4096 |
| High Turnover (Sit Down Restaurant) | 26.3061 | 0.2837 | 2.5790 | 2.1664 | 0.0155 | | 0.1960 | 0.1960 | | 0.1960 | 0.1960 | | 3,094.8401 | 3,094.8401 | 0.0593 | 0.0567 | 3,113.2312 |
| High Turnover (Sit Down Restaurant) | 9.14705 | 0.0986 | 0.8968 | 0.7533 | 5.3800e-003 | | 0.0682 | 0.0682 | | 0.0682 | 0.0682 | | 1,076.1240 | 1,076.1240 | 0.0206 | 0.0197 | 1,082.5189 |
| Office Park | 0.0525397 | 5.7000e-004 | 5.1500e-003 | 4.3300e-003 | 3.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 6.1811 | 6.1811 | 1.2000e-004 | 1.1000e-004 | 6.2179 |
| Office Park | 0.349564 | 3.7700e-003 | 0.0343 | 0.0288 | 2.1000e-004 | | 2.6000e-003 | 2.6000e-003 | | 2.6000e-003 | 2.6000e-003 | | 41.1252 | 41.1252 | 7.9000e-004 | 7.5000e-004 | 41.3696 |
| Office Park | 2.52078 | 0.0272 | 0.2471 | 0.2076 | 1.4800e-003 | | 0.0188 | 0.0188 | | 0.0188 | 0.0188 | | 296.5620 | 296.5620 | 5.6800e-003 | 5.4400e-003 | 298.3244 |
| Strip Mall | 0.0647319 | 7.0000e-004 | 6.3500e-003 | 5.3300e-003 | 4.0000e-005 | | 4.8000e-004 | 4.8000e-004 | | 4.8000e-004 | 4.8000e-004 | | 7.6155 | 7.6155 | 1.5000e-004 | 1.4000e-004 | 7.6608 |
| Strip Mall | 4.47574 | 0.0483 | 0.4388 | 0.3686 | 2.6300e-003 | | 0.0334 | 0.0334 | | 0.0334 | 0.0334 | | 526.5582 | 526.5582 | 0.0101 | 9.6500e-003 | 529.6873 |
| **Total** | | **3.7068** | **31.9286** | **15.3305** | **0.2022** | | **2.5610** | **2.5610** | | **2.5610** | **2.5610** | | **40,437.5978** | **40,437.5978** | **0.7751** | **0.7414** | **40,677.8982** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

No Hearths Installed

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 316.7449 | 11.4872 | 995.6987 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | 0.0000 | 1,799.2273 | 1,799.2273 | 1.7132 | 0.0000 | 1,842.0568 |
| Unmitigated | 421.5230 | 906.8637 | 1,376.7100 | 5.7679 | | 77.9331 | 77.9331 | | 77.9331 | 77.9331 | 0.0000 | 1,144,833.1096 | 1,144,833.1096 | 23.6213 | 20.9556 | 1,151,668.4180 |

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 23.7649 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 263.2017 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 104.7781 | 895.3765 | 381.0113 | 5.7152 | | 72.3922 | 72.3922 | | 72.3922 | 72.3922 | 0.0000 | 1,143,033.8824 | 1,143,033.8824 | 21.9082 | 20.9556 | 1,149,826.3612 |
| Landscaping | 29.7784 | 11.4872 | 995.6987 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | | 1,799.2273 | 1,799.2273 | 1.7132 | | 1,842.0568 |
| **Total** | **421.5230** | **906.8637** | **1,376.7100** | **5.7679** | | **77.9331** | **77.9331** | | **77.9331** | **77.9331** | **0.0000** | **1,144,833.1096** | **1,144,833.1096** | **23.6213** | **20.9556** | **1,151,668.4180** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 23.7649 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 263.2017 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 29.7784 | 11.4872 | 995.6987 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | | 1,799.2273 | 1,799.2273 | 1.7132 | | 1,842.0568 |
| **Total** | **316.7449** | **11.4872** | **995.6987** | **0.0528** | | **5.5409** | **5.5409** | | **5.5409** | **5.5409** | **0.0000** | **1,799.2273** | **1,799.2273** | **1.7132** | **0.0000** | **1,842.0568** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan Operations - Buildout

**Los Angeles-South Coast County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 10,794.00 | Dwelling Unit | 181.00 | 10,794,000.00 | 42097 |
| Strip Mall | 1,002.24 | 1000sqft | 0.00 | 1,002,237.32 | 0 |
| Office Park | 94.95 | 1000sqft | 0.00 | 94,951.88 | 0 |
| Apartments Mid Rise | 652.00 | Dwelling Unit | 53.71 | 652,000.00 | 2543 |
| Apartments Mid Rise | 301.00 | Dwelling Unit | 24.44 | 301,000.00 | 1174 |
| Strip Mall | 14.50 | 1000sqft | 0.00 | 14,495.18 | 0 |
| High Turnover (Sit Down Restaurant) | 14.50 | 1000sqft | 0.00 | 14,495.18 | 0 |
| Apartments Mid Rise | 158.00 | Dwelling Unit | 275.09 | 158,000.00 | 616 |
| High Turnover (Sit Down Restaurant) | 41.69 | 1000sqft | 0.00 | 41,686.89 | 0 |
| Apartments Low Rise | 144.00 | Dwelling Unit | 303.25 | 144,000.00 | 562 |
| Office Park | 1.98 | 1000sqft | 0.00 | 1,979.05 | 0 |
| Apartments Mid Rise | 61.00 | Dwelling Unit | 69.51 | 61,000.00 | 238 |
| Office Park | 13.17 | 1000sqft | 0.00 | 13,167.29 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Project Characteristics -

Land Use - Proposed land use types and acreages per Specific Plan with ratio assumptions for LU to SF at buildout.

Construction Phase - Operational only run. Construction phases entered as placeholders.

Off-road Equipment - Operational only run. Construction phases entered as placeholders.

Off-road Equipment - Operational only run. Construction phases entered as placeholders.

Trips and VMT - Operational only run.

Architectural Coating - Operational only run.

Vehicle Trips - Project trips and lengths adjusted to match the Fehr & Peers traffic numbers. All Vehicles (non-trucks) entered in residential land use, trucks entered in retail land use.

Woodstoves - No wood-burning devices per SCAQMD Rule 445.

Area Mitigation -

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblArchitecturalCoating | ConstArea_Nonresidential_Exterior | 591,506.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Nonresidential_Interior | 1,774,519.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Exterior | 8,174,250.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Interior | 24,522,750.00 | 0.00 |
| tblConstructionPhase | NumDays | 1,100.00 | 1.00 |
| tblConstructionPhase | NumDays | 1,100.00 | 1.00 |
| tblConstructionPhase | PhaseEndDate | 12/1/2084 | 1/3/2022 |
| tblConstructionPhase | PhaseEndDate | 9/13/2080 | 1/3/2022 |
| tblConstructionPhase | PhaseStartDate | 9/14/2080 | 1/1/2022 |
| tblConstructionPhase | PhaseStartDate | 6/27/2076 | 1/1/2022 |
| tblFireplaces | NumberGas | 122.40 | 129.60 |
| tblFireplaces | NumberGas | 10,171.10 | 10,769.40 |
| tblFireplaces | NumberWood | 7.20 | 0.00 |
| tblFireplaces | NumberWood | 598.30 | 0.00 |
| tblLandUse | LandUseSquareFeet | 1,002,240.00 | 1,002,237.32 |
| tblLandUse | LandUseSquareFeet | 94,951.90 | 94,951.88 |
| tblLandUse | LandUseSquareFeet | 14,495.20 | 14,495.18 |

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblLandUse | LandUseSquareFeet | 14,495.20 | 14,495.18 |
| tblLandUse | LandUseSquareFeet | 41,686.90 | 41,686.89 |
| tblLandUse | LandUseSquareFeet | 13,167.30 | 13,167.29 |
| tblLandUse | LotAcreage | 284.05 | 181.00 |
| tblLandUse | LotAcreage | 23.01 | 0.00 |
| tblLandUse | LotAcreage | 2.18 | 0.00 |
| tblLandUse | LotAcreage | 17.16 | 53.71 |
| tblLandUse | LotAcreage | 7.92 | 24.44 |
| tblLandUse | LotAcreage | 0.33 | 0.00 |
| tblLandUse | LotAcreage | 0.33 | 0.00 |
| tblLandUse | LotAcreage | 4.16 | 275.09 |
| tblLandUse | LotAcreage | 0.96 | 0.00 |
| tblLandUse | LotAcreage | 9.00 | 303.25 |
| tblLandUse | LotAcreage | 0.05 | 0.00 |
| tblLandUse | LotAcreage | 1.61 | 69.51 |
| tblLandUse | LotAcreage | 0.30 | 0.00 |
| tblLandUse | Population | 30,871.00 | 42,097.00 |
| tblLandUse | Population | 1,865.00 | 2,543.00 |
| tblLandUse | Population | 861.00 | 1,174.00 |
| tblLandUse | Population | 452.00 | 616.00 |
| tblLandUse | Population | 412.00 | 562.00 |
| tblLandUse | Population | 174.00 | 238.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 6.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblTripsAndVMT | WorkerTripNumber | 1,821.00 | 0.00 |
| tblVehicleTrips | ST_TR | 8.14 | 0.00 |
| tblVehicleTrips | ST_TR | 4.91 | 0.00 |
| tblVehicleTrips | ST_TR | 122.40 | 0.00 |
| tblVehicleTrips | ST_TR | 1.64 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 0.00 |
| tblVehicleTrips | SU_TR | 6.28 | 0.00 |
| tblVehicleTrips | SU_TR | 4.09 | 0.00 |
| tblVehicleTrips | SU_TR | 142.64 | 0.00 |
| tblVehicleTrips | SU_TR | 0.76 | 0.00 |
| tblVehicleTrips | SU_TR | 20.43 | 0.00 |
| tblVehicleTrips | WD_TR | 7.32 | 0.00 |
| tblVehicleTrips | WD_TR | 5.44 | 0.00 |
| tblVehicleTrips | WD_TR | 112.18 | 0.00 |
| tblVehicleTrips | WD_TR | 11.07 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 0.00 |
| tblWoodstoves | NumberCatalytic | 7.20 | 0.00 |
| tblWoodstoves | NumberCatalytic | 598.30 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 7.20 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 598.30 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | |
|---|---|---|---|---|
| | | **Highest** | | |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 57.4034 | 12.6281 | 129.2250 | 0.0780 | | 1.5975 | 1.5975 | | 1.5975 | 1.5975 | 0.0000 | 13,165.8151 | 13,165.8151 | 0.4427 | 0.2376 | 13,247.6973 |
| Energy | 0.6765 | 5.8270 | 2.7978 | 0.0369 | | 0.4674 | 0.4674 | | 0.4674 | 0.4674 | 0.0000 | 17,978.5032 | 17,978.5032 | 1.0807 | 0.2382 | 18,076.4979 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 1,503.9824 | 0.0000 | 1,503.9824 | 88.8828 | 0.0000 | 3,726.0527 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 285.8295 | 3,177.2856 | 3,463.1151 | 29.6256 | 0.7257 | 4,420.0133 |
| **Total** | **58.0799** | **18.4551** | **132.0228** | **0.1149** | **0.0000** | **2.0649** | **2.0649** | **0.0000** | **2.0649** | **2.0649** | **1,789.8119** | **34,321.6040** | **36,111.4159** | **120.0318** | **1.2015** | **39,470.2611** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 56.0937 | 1.4359 | 124.4623 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0289 | 204.0289 | 0.1943 | 0.0000 | 208.8857 |
| Energy | 0.6765 | 5.8270 | 2.7978 | 0.0369 | | 0.4674 | 0.4674 | | 0.4674 | 0.4674 | 0.0000 | 17,978.5032 | 17,978.5032 | 1.0807 | 0.2382 | 18,076.4979 |
| Mobile | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 1,503.9824 | 0.0000 | 1,503.9824 | 88.8828 | 0.0000 | 3,726.0527 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 285.8295 | 3,177.2856 | 3,463.1151 | 29.6256 | 0.7257 | 4,420.0133 |
| **Total** | **56.7702** | **7.2629** | **127.2602** | **0.0435** | **0.0000** | **1.1600** | **1.1600** | **0.0000** | **1.1600** | **1.1600** | **1,789.8119** | **21,359.8178** | **23,149.6297** | **119.7834** | **0.9639** | **26,431.4495** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **2.26** | **60.65** | **3.61** | **62.15** | **0.00** | **43.82** | **43.82** | **0.00** | **43.82** | **43.82** | **0.00** | **37.77** | **35.89** | **0.21** | **19.78** | **33.03** |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Paving | Paving | 1/1/2022 | 1/3/2022 | 5 | 1 | |
| 2 | Architectural Coating | Architectural Coating | 1/1/2022 | 1/3/2022 | 5 | 1 | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 0 | 0.00 | 78 | 0.48 |
| Paving | Pavers | 0 | 0.00 | 130 | 0.42 |
| Paving | Paving Equipment | 0 | 0.00 | 132 | 0.36 |
| Paving | Rollers | 0 | 0.00 | 80 | 0.38 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Paving | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Paving - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Low Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| Apartments Mid Rise | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| High Turnover (Sit Down Restaurant) | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Office Park | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 0.00 | 0.00 | 0.00 | | |
| Total | 0.00 | 0.00 | 0.00 | | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Low Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| Apartments Mid Rise | 14.70 | 5.90 | 8.70 | 40.20 | 19.20 | 40.60 | 86 | 11 | 3 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| High Turnover (Sit Down | 16.60 | 8.40 | 6.90 | 8.50 | 72.50 | 19.00 | 37 | 20 | 43 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Office Park | 16.60 | 8.40 | 6.90 | 33.00 | 48.00 | 19.00 | 82 | 15 | 3 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |
| Strip Mall | 16.60 | 8.40 | 6.90 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Low Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| High Turnover (Sit Down Restaurant) | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Office Park | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 11,283.6054 | 11,283.6054 | 0.9524 | 0.1154 | 11,341.8156 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 11,283.6054 | 11,283.6054 | 0.9524 | 0.1154 | 11,341.8156 |
| NaturalGas Mitigated | 0.6765 | 5.8270 | 2.7978 | 0.0369 | | 0.4674 | 0.4674 | | 0.4674 | 0.4674 | 0.0000 | 6,694.8978 | 6,694.8978 | 0.1283 | 0.1227 | 6,734.6823 |
| NaturalGas Unmitigated | 0.6765 | 5.8270 | 2.7978 | 0.0369 | | 0.4674 | 0.4674 | | 0.4674 | 0.4674 | 0.0000 | 6,694.8978 | 6,694.8978 | 0.1283 | 0.1227 | 6,734.6823 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 1.96987e+006 | 0.0106 | 0.0908 | 0.0386 | 5.8000e-004 | | 7.3400e-003 | 7.3400e-003 | | 7.3400e-003 | 7.3400e-003 | 0.0000 | 105.1199 | 105.1199 | 2.0100e-003 | 1.9300e-003 | 105.7446 |
| Apartments Mid Rise | 1.42371e+006 | 7.6800e-003 | 0.0656 | 0.0279 | 4.2000e-004 | | 5.3000e-003 | 5.3000e-003 | | 5.3000e-003 | 5.3000e-003 | 0.0000 | 75.9744 | 75.9744 | 1.4600e-003 | 1.3900e-003 | 76.4259 |
| Apartments Mid Rise | 2.71225e+006 | 0.0146 | 0.1250 | 0.0532 | 8.0000e-004 | | 0.0101 | 0.0101 | | 0.0101 | 0.0101 | 0.0000 | 144.7360 | 144.7360 | 2.7700e-003 | 2.6500e-003 | 145.5961 |
| Apartments Mid Rise | 5.87504e+006 | 0.0317 | 0.2707 | 0.1152 | 1.7300e-003 | | 0.0219 | 0.0219 | | 0.0219 | 0.0219 | 0.0000 | 313.5146 | 313.5146 | 6.0100e-003 | 5.7500e-003 | 315.3777 |
| Apartments Mid Rise | 549659 | 2.9600e-003 | 0.0253 | 0.0108 | 1.6000e-004 | | 2.0500e-003 | 2.0500e-003 | | 2.0500e-003 | 2.0500e-003 | 0.0000 | 29.3319 | 29.3319 | 5.6000e-004 | 5.4000e-004 | 29.5062 |
| Apartments Mid Rise | 9.72626e+007 | 0.5245 | 4.4817 | 1.9071 | 0.0286 | | 0.3624 | 0.3624 | | 0.3624 | 0.3624 | 0.0000 | 5,190.3014 | 5,190.3014 | 0.0995 | 0.0952 | 5,221.1448 |
| High Turnover (Sit Down Restaurant) | 3.33867e+006 | 0.0180 | 0.1637 | 0.1375 | 9.8000e-004 | | 0.0124 | 0.0124 | | 0.0124 | 0.0124 | 0.0000 | 178.1644 | 178.1644 | 3.4100e-003 | 3.2700e-003 | 179.2231 |
| High Turnover (Sit Down Restaurant) | 9.60174e+006 | 0.0518 | 0.4707 | 0.3954 | 2.8200e-003 | | 0.0358 | 0.0358 | | 0.0358 | 0.0358 | 0.0000 | 512.3855 | 512.3855 | 9.8200e-003 | 9.3900e-003 | 515.4303 |
| Office Park | 127591 | 6.9000e-004 | 6.2500e-003 | 5.2500e-003 | 4.0000e-005 | | 4.8000e-004 | 4.8000e-004 | | 4.8000e-004 | 4.8000e-004 | 0.0000 | 6.8087 | 6.8087 | 1.3000e-004 | 1.2000e-004 | 6.8492 |
| Office Park | 19177 | 1.0000e-004 | 9.4000e-004 | 7.9000e-004 | 1.0000e-005 | | 7.0000e-005 | 7.0000e-005 | | 7.0000e-005 | 7.0000e-005 | 0.0000 | 1.0234 | 1.0234 | 2.0000e-005 | 2.0000e-005 | 1.0294 |
| Office Park | 920084 | 4.9600e-003 | 0.0451 | 0.0379 | 2.7000e-004 | | 3.4300e-003 | 3.4300e-003 | | 3.4300e-003 | 3.4300e-003 | 0.0000 | 49.0992 | 49.0992 | 9.4000e-004 | 9.0000e-004 | 49.3909 |
| Strip Mall | 1.63365e+006 | 8.8100e-003 | 0.0801 | 0.0673 | 4.8000e-004 | | 6.0900e-003 | 6.0900e-003 | | 6.0900e-003 | 6.0900e-003 | 0.0000 | 87.1776 | 87.1776 | 1.6700e-003 | 1.6000e-003 | 87.6957 |
| Strip Mall | 23627.1 | 1.3000e-004 | 1.1600e-003 | 9.7000e-004 | 1.0000e-005 | | 9.0000e-005 | 9.0000e-005 | | 9.0000e-005 | 9.0000e-005 | 0.0000 | 1.2608 | 1.2608 | 2.0000e-005 | 2.0000e-005 | 1.2683 |
| **Total** | | **0.6765** | **5.8270** | **2.7978** | **0.0369** | | **0.4674** | **0.4674** | | **0.4674** | **0.4674** | **0.0000** | **6,694.8978** | **6,694.8978** | **0.1283** | **0.1227** | **6,734.6823** |

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Low Rise | 1.96987e+006 | 0.0106 | 0.0908 | 0.0386 | 5.8000e-004 | | 7.3400e-003 | 7.3400e-003 | | 7.3400e-003 | 7.3400e-003 | 0.0000 | 105.1199 | 105.1199 | 2.0100e-003 | 1.9300e-003 | 105.7446 |
| Apartments Mid Rise | 1.42371e+006 | 7.6800e-003 | 0.0656 | 0.0279 | 4.2000e-004 | | 5.3000e-003 | 5.3000e-003 | | 5.3000e-003 | 5.3000e-003 | 0.0000 | 75.9744 | 75.9744 | 1.4600e-003 | 1.3900e-003 | 76.4259 |
| Apartments Mid Rise | 2.71225e+006 | 0.0146 | 0.1250 | 0.0532 | 8.0000e-004 | | 0.0101 | 0.0101 | | 0.0101 | 0.0101 | 0.0000 | 144.7360 | 144.7360 | 2.7700e-003 | 2.6500e-003 | 145.5961 |
| Apartments Mid Rise | 5.87504e+006 | 0.0317 | 0.2707 | 0.1152 | 1.7300e-003 | | 0.0219 | 0.0219 | | 0.0219 | 0.0219 | 0.0000 | 313.5146 | 313.5146 | 6.0100e-003 | 5.7500e-003 | 315.3777 |
| Apartments Mid Rise | 549659 | 2.9600e-003 | 0.0253 | 0.0108 | 1.6000e-004 | | 2.0500e-003 | 2.0500e-003 | | 2.0500e-003 | 2.0500e-003 | 0.0000 | 29.3319 | 29.3319 | 5.6000e-004 | 5.4000e-004 | 29.5062 |
| Apartments Mid Rise | 9.72626e+007 | 0.5245 | 4.4817 | 1.9071 | 0.0286 | | 0.3624 | 0.3624 | | 0.3624 | 0.3624 | 0.0000 | 5,190.3014 | 5,190.3014 | 0.0995 | 0.0952 | 5,221.1448 |
| High Turnover (Sit Down Restaurant) | 3.33867e+006 | 0.0180 | 0.1637 | 0.1375 | 9.8000e-004 | | 0.0124 | 0.0124 | | 0.0124 | 0.0124 | 0.0000 | 178.1644 | 178.1644 | 3.4100e-003 | 3.2700e-003 | 179.2231 |
| High Turnover (Sit Down Restaurant) | 9.60174e+006 | 0.0518 | 0.4707 | 0.3954 | 2.8200e-003 | | 0.0358 | 0.0358 | | 0.0358 | 0.0358 | 0.0000 | 512.3855 | 512.3855 | 9.8200e-003 | 9.3900e-003 | 515.4303 |
| Office Park | 127591 | 6.9000e-004 | 6.2500e-003 | 5.2500e-003 | 4.0000e-005 | | 4.8000e-004 | 4.8000e-004 | | 4.8000e-004 | 4.8000e-004 | 0.0000 | 6.8087 | 6.8087 | 1.3000e-004 | 1.2000e-004 | 6.8492 |
| Office Park | 19177 | 1.0000e-004 | 9.4000e-004 | 7.9000e-004 | 1.0000e-005 | | 7.0000e-005 | 7.0000e-005 | | 7.0000e-005 | 7.0000e-005 | 0.0000 | 1.0234 | 1.0234 | 2.0000e-005 | 2.0000e-005 | 1.0294 |
| Office Park | 920084 | 4.9600e-003 | 0.0451 | 0.0379 | 2.7000e-004 | | 3.4300e-003 | 3.4300e-003 | | 3.4300e-003 | 3.4300e-003 | 0.0000 | 49.0992 | 49.0992 | 9.4000e-004 | 9.0000e-004 | 49.3909 |
| Strip Mall | 1.63365e+006 | 8.8100e-003 | 0.0801 | 0.0673 | 4.8000e-004 | | 6.0900e-003 | 6.0900e-003 | | 6.0900e-003 | 6.0900e-003 | 0.0000 | 87.1776 | 87.1776 | 1.6700e-003 | 1.6000e-003 | 87.6957 |
| Strip Mall | 23627.1 | 1.3000e-004 | 1.1600e-003 | 9.7000e-004 | 1.0000e-005 | | 9.0000e-005 | 9.0000e-005 | | 9.0000e-005 | 9.0000e-005 | 0.0000 | 1.2608 | 1.2608 | 2.0000e-005 | 2.0000e-005 | 1.2683 |
| **Total** | | **0.6765** | **5.8270** | **2.7978** | **0.0369** | | **0.4674** | **0.4674** | | **0.4674** | **0.4674** | **0.0000** | **6,694.8978** | **6,694.8978** | **0.1283** | **0.1227** | **6,734.6823** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 577711 | 102.4544 | 8.6500e-003 | 1.0500e-003 | 102.9830 |
| Apartments Mid Rise | 1.15301e+006 | 204.4808 | 0.0173 | 2.0900e-003 | 205.5356 |
| Apartments Mid Rise | 2.49754e+006 | 442.9284 | 0.0374 | 4.5300e-003 | 445.2134 |
| Apartments Mid Rise | 233666 | 41.4396 | 3.5000e-003 | 4.2000e-004 | 41.6534 |
| Apartments Mid Rise | 4.13474e+007 | 7,332.7751 | 0.6189 | 0.0750 | 7,370.6037 |
| Apartments Mid Rise | 605233 | 107.3354 | 9.0600e-003 | 1.1000e-003 | 107.8891 |
| High Turnover (Sit Down Restaurant) | 1.80379e+006 | 319.8944 | 0.0270 | 3.2700e-003 | 321.5447 |
| High Turnover (Sit Down Restaurant) | 627206 | 111.2323 | 9.3900e-003 | 1.1400e-003 | 111.8061 |
| Office Park | 1.28565e+006 | 228.0040 | 0.0192 | 2.3300e-003 | 229.1803 |
| Office Park | 178285 | 31.6181 | 2.6700e-003 | 3.2000e-004 | 31.7812 |
| Office Park | 26796.3 | 4.7522 | 4.0000e-004 | 5.0000e-005 | 4.7767 |
| Strip Mall | 1.30992e+007 | 2,323.0922 | 0.1961 | 0.0238 | 2,335.0766 |
| Strip Mall | 189452 | 33.5985 | 2.8400e-003 | 3.4000e-004 | 33.7718 |
| **Total** | | **11,283.6054** | **0.9524** | **0.1154** | **11,341.8157** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Low Rise | 577711 | 102.4544 | 8.6500e-003 | 1.0500e-003 | 102.9830 |
| Apartments Mid Rise | 1.15301e+006 | 204.4808 | 0.0173 | 2.0900e-003 | 205.5356 |
| Apartments Mid Rise | 2.49754e+006 | 442.9284 | 0.0374 | 4.5300e-003 | 445.2134 |
| Apartments Mid Rise | 233666 | 41.4396 | 3.5000e-003 | 4.2000e-004 | 41.6534 |
| Apartments Mid Rise | 4.13474e+007 | 7,332.7751 | 0.6189 | 0.0750 | 7,370.6037 |
| Apartments Mid Rise | 605233 | 107.3354 | 9.0600e-003 | 1.1000e-003 | 107.8891 |
| High Turnover (Sit Down Restaurant) | 1.80379e+006 | 319.8944 | 0.0270 | 3.2700e-003 | 321.5447 |
| High Turnover (Sit Down Restaurant) | 627206 | 111.2323 | 9.3900e-003 | 1.1400e-003 | 111.8061 |
| Office Park | 1.28565e+006 | 228.0040 | 0.0192 | 2.3300e-003 | 229.1803 |
| Office Park | 178285 | 31.6181 | 2.6700e-003 | 3.2000e-004 | 31.7812 |
| Office Park | 26796.3 | 4.7522 | 4.0000e-004 | 5.0000e-005 | 4.7767 |
| Strip Mall | 1.30992e+007 | 2,323.0922 | 0.1961 | 0.0238 | 2,335.0766 |
| Strip Mall | 189452 | 33.5985 | 2.8400e-003 | 3.4000e-004 | 33.7718 |
| **Total** | | **11,283.6054** | **0.9524** | **0.1154** | **11,341.8157** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

No Hearths Installed

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 56.0937 | 1.4359 | 124.4623 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0289 | 204.0289 | 0.1943 | 0.0000 | 208.8857 |
| Unmitigated | 57.4034 | 12.6281 | 129.2250 | 0.0780 | | 1.5975 | 1.5975 | | 1.5975 | 1.5975 | 0.0000 | 13,165.8151 | 13,165.8151 | 0.4427 | 0.2376 | 13,247.6973 |

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 4.3371 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 48.0343 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.3097 | 11.1922 | 4.7626 | 0.0714 | | 0.9049 | 0.9049 | | 0.9049 | 0.9049 | 0.0000 | 12,961.7862 | 12,961.7862 | 0.2484 | 0.2376 | 13,038.8116 |
| Landscaping | 3.7223 | 1.4359 | 124.4623 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0289 | 204.0289 | 0.1943 | 0.0000 | 208.8857 |
| **Total** | **57.4034** | **12.6281** | **129.2250** | **0.0780** | | **1.5975** | **1.5975** | | **1.5975** | **1.5975** | **0.0000** | **13,165.8151** | **13,165.8151** | **0.4427** | **0.2376** | **13,247.6973** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 4.3371 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 48.0343 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 3.7223 | 1.4359 | 124.4623 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0289 | 204.0289 | 0.1943 | 0.0000 | 208.8857 |
| **Total** | **56.0937** | **1.4359** | **124.4623** | **6.6000e-003** | | **0.6926** | **0.6926** | | **0.6926** | **0.6926** | **0.0000** | **204.0289** | **204.0289** | **0.1943** | **0.0000** | **208.8857** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 3,463.1151 | 29.6256 | 0.7257 | 4,420.0133 |
| Unmitigated | 3,463.1151 | 29.6256 | 0.7257 | 4,420.0133 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 9.38218 / 5.91485 | 36.2961 | 0.3085 | 7.5600e-003 | 46.2621 |
| Apartments Mid Rise | 779.633 / 491.508 | 3,016.1053 | 25.6381 | 0.6282 | 3,844.2536 |
| High Turnover (Sit Down Restaurant) | 17.0525 / 1.08846 | 46.9326 | 0.5592 | 0.0136 | 64.9480 |
| Office Park | 19.5685 / 11.9936 | 75.0271 | 0.6435 | 0.0158 | 95.8098 |
| Strip Mall | 75.3125 / 46.1593 | 288.7541 | 2.4764 | 0.0607 | 368.7397 |
| **Total** | | **3,463.1151** | **29.6256** | **0.7257** | **4,420.0133** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Low Rise | 9.38218 / 5.91485 | 36.2961 | 0.3085 | 7.5600e-003 | 46.2621 |
| Apartments Mid Rise | 779.633 / 491.508 | 3,016.1053 | 25.6381 | 0.6282 | 3,844.2536 |
| High Turnover (Sit Down Restaurant) | 17.0525 / 1.08846 | 46.9326 | 0.5592 | 0.0136 | 64.9480 |
| Office Park | 19.5685 / 11.9936 | 75.0271 | 0.6435 | 0.0158 | 95.8098 |
| Strip Mall | 75.3125 / 46.1593 | 288.7541 | 2.4764 | 0.0607 | 368.7397 |
| **Total** | | **3,463.1151** | **29.6256** | **0.7257** | **4,420.0133** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

FFTOD Specific Plan Operations - Buildout - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 1,503.9824 | 88.8828 | 0.0000 | 3,726.0527 |
| Unmitigated | 1,503.9824 | 88.8828 | 0.0000 | 3,726.0527 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 66.24 | 13.4461 | 0.7946 | 0.0000 | 33.3122 |
| Apartments Mid Rise | 5504.36 | 1,117.3353 | 66.0326 | 0.0000 | 2,768.1510 |
| High Turnover (Sit Down Restaurant) | 668.54 | 135.7076 | 8.0201 | 0.0000 | 336.2098 |
| Office Park | 102.39 | 20.7842 | 1.2283 | 0.0000 | 51.4921 |
| Strip Mall | 1067.58 | 216.7091 | 12.8071 | 0.0000 | 536.8876 |
| **Total** | | **1,503.9824** | **88.8828** | **0.0000** | **3,726.0527** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Low Rise | 66.24 | 13.4461 | 0.7946 | 0.0000 | 33.3122 |
| Apartments Mid Rise | 5504.36 | 1,117.3353 | 66.0326 | 0.0000 | 2,768.1510 |
| High Turnover (Sit Down Restaurant) | 668.54 | 135.7076 | 8.0201 | 0.0000 | 336.2098 |
| Office Park | 102.39 | 20.7842 | 1.2283 | 0.0000 | 51.4921 |
| Strip Mall | 1067.58 | 216.7091 | 12.8071 | 0.0000 | 536.8876 |
| **Total** | | **1,503.9824** | **88.8828** | **0.0000** | **3,726.0527** |

### 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

### 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan: Operations - Mobile Sources Only

**Los Angeles-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 12,110.00 | Dwelling Unit | 318.68 | 12,110,000.00 | 34635 |
| Strip Mall | 1,016.73 | 1000sqft | 23.34 | 1,016,730.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

Project Characteristics - Mobile sources category only run.

Land Use - Entered all vehicle trips into two land uses for simplicity. All vehicles (non-trucks) entered into Apartments Mid Rise category and all truck trips entered in strip mall category.

Construction Phase - Mobile sources only run.

Off-road Equipment - Mobile sources only run.

Off-road Equipment - Mobile sources only run.

Trips and VMT - Mobile sources only run.

Architectural Coating - Mobile sources only run.

Vehicle Trips - Adjusted trip rates and trip lengths to match Total VMT and total daily trips per Fehr & Peers traffic study.

Woodstoves - Mobile sources only run.

Area Coating - Mobile sources only run.

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Energy Use - Mobile sources only run.

Water And Wastewater - Mobile sources only run.

Solid Waste - Mobile sources only run.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblArchitecturalCoating | ConstArea_Nonresidential_Exterior | 508,365.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Nonresidential_Interior | 1,525,095.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Exterior | 8,174,250.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Interior | 24,522,750.00 | 0.00 |
| tblAreaCoating | Area_Nonresidential_Exterior | 508365 | 0 |
| tblAreaCoating | Area_Nonresidential_Interior | 1525095 | 0 |
| tblAreaCoating | Area_Residential_Exterior | 8174250 | 0 |
| tblAreaCoating | Area_Residential_Interior | 24522750 | 0 |
| tblConstructionPhase | NumDays | 440.00 | 1.00 |
| tblConstructionPhase | NumDays | 6,200.00 | 1.00 |
| tblConstructionPhase | PhaseEndDate | 1/19/2037 | 12/1/2022 |
| tblConstructionPhase | PhaseEndDate | 9/5/2033 | 12/1/2022 |
| tblConstructionPhase | PhaseStartDate | 5/15/2035 | 12/1/2022 |
| tblConstructionPhase | PhaseStartDate | 12/1/2009 | 12/1/2022 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 6.26 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 3.23 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 0.49 | 0.00 |
| tblEnergyUse | T24E | 35.05 | 0.00 |
| tblEnergyUse | T24E | 3.58 | 0.00 |
| tblEnergyUse | T24NG | 4,179.80 | 0.00 |
| tblEnergyUse | T24NG | 1.14 | 0.00 |

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblFireplaces | NumberGas | 10,293.50 | 0.00 |
| tblFireplaces | NumberWood | 605.50 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 3.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 3.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 6.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 7.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 7.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 5,570.60 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 1,067.57 | 0.00 |
| tblTripsAndVMT | VendorTripNumber | 1,461.00 | 0.00 |
| tblTripsAndVMT | WorkerTripNumber | 9,045.00 | 0.00 |
| tblTripsAndVMT | WorkerTripNumber | 1,809.00 | 0.00 |
| tblVehicleTrips | CC_TL | 8.40 | 27.57 |
| tblVehicleTrips | CC_TTP | 64.40 | 100.00 |
| tblVehicleTrips | CNW_TTP | 19.00 | 0.00 |
| tblVehicleTrips | CW_TTP | 16.60 | 0.00 |
| tblVehicleTrips | DV_TP | 11.00 | 0.00 |
| tblVehicleTrips | DV_TP | 40.00 | 0.00 |
| tblVehicleTrips | HO_TTP | 40.60 | 0.00 |
| tblVehicleTrips | HS_TTP | 19.20 | 0.00 |
| tblVehicleTrips | HW_TL | 14.70 | 7.60 |
| tblVehicleTrips | HW_TTP | 40.20 | 100.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblVehicleTrips | PB_TP | 3.00 | 0.00 |
| tblVehicleTrips | PB_TP | 15.00 | 0.00 |
| tblVehicleTrips | PR_TP | 86.00 | 100.00 |
| tblVehicleTrips | PR_TP | 45.00 | 100.00 |
| tblVehicleTrips | ST_TR | 4.91 | 5.01 |
| tblVehicleTrips | ST_TR | 42.04 | 1.60 |
| tblVehicleTrips | SU_TR | 4.09 | 4.17 |
| tblVehicleTrips | SU_TR | 20.43 | 0.78 |
| tblVehicleTrips | WD_TR | 5.44 | 5.55 |
| tblVehicleTrips | WD_TR | 44.32 | 1.69 |
| tblWater | IndoorWaterUseRate | 789,015,250.28 | 0.00 |
| tblWater | IndoorWaterUseRate | 75,311,754.77 | 0.00 |
| tblWater | OutdoorWaterUseRate | 497,422,657.78 | 0.00 |
| tblWater | OutdoorWaterUseRate | 46,158,817.44 | 0.00 |
| tblWoodstoves | NumberCatalytic | 605.50 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 605.50 | 0.00 |

## 2.0 Emissions Summary

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 289.6861 | 11.4870 | 995.6818 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | 0.0000 | 1,799.1909 | 1,799.1909 | 1.7131 | 0.0000 | 1,842.0181 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 152.5581 | 143.1847 | 1,477.9377 | 3.1279 | 427.8317 | 1.8174 | 429.6491 | 114.0012 | 1.6927 | 115.6939 | | 344,806.0828 | 344,806.0828 | 23.8016 | 14.3818 | 349,686.9080 |
| **Total** | **442.2442** | **154.6717** | **2,473.6195** | **3.1807** | **427.8317** | **7.3583** | **435.1900** | **114.0012** | **7.2336** | **121.2348** | **0.0000** | **346,605.2736** | **346,605.2736** | **25.5147** | **14.3818** | **351,528.9260** |

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 289.6861 | 11.4870 | 995.6818 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | 0.0000 | 1,799.1909 | 1,799.1909 | 1.7131 | 0.0000 | 1,842.0181 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 152.5581 | 143.1847 | 1,477.9377 | 3.1279 | 427.8317 | 1.8174 | 429.6491 | 114.0012 | 1.6927 | 115.6939 | | 344,806.0828 | 344,806.0828 | 23.8016 | 14.3818 | 349,686.9080 |
| **Total** | **442.2442** | **154.6717** | **2,473.6195** | **3.1807** | **427.8317** | **7.3583** | **435.1900** | **114.0012** | **7.2336** | **121.2348** | **0.0000** | **346,605.2736** | **346,605.2736** | **25.5147** | **14.3818** | **351,528.9260** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Building Construction | Building Construction | 12/1/2022 | 12/1/2022 | 5 | 1 | |
| 2 | Architectural Coating | Architectural Coating | 12/1/2022 | 12/1/2022 | 5 | 1 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 0 | 0.00 | 78 | 0.48 |
| Building Construction | Cranes | 0 | 0.00 | 231 | 0.29 |
| Building Construction | Forklifts | 0 | 0.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 0 | 0.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 0 | 0.00 | 97 | 0.37 |
| Building Construction | Welders | 0 | 0.00 | 46 | 0.45 |

**Trips and VMT**

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Building Construction | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Building Construction - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 152.5581 | 143.1847 | 1,477.9377 | 3.1279 | 427.8317 | 1.8174 | 429.6491 | 114.0012 | 1.6927 | 115.6939 | | 344,806.0828 | 344,806.0828 | 23.8016 | 14.3818 | 349,686.9080 |
| Unmitigated | 152.5581 | 143.1847 | 1,477.9377 | 3.1279 | 427.8317 | 1.8174 | 429.6491 | 114.0012 | 1.6927 | 115.6939 | | 344,806.0828 | 344,806.0828 | 23.8016 | 14.3818 | 349,686.9080 |

### 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 67,226.24 | 60,675.94 | 50543.51 | 176,702,260 | 176,702,260 |
| Strip Mall | 1,715.73 | 1,627.48 | 790.91 | 15,768,555 | 15,768,555 |
| Total | 68,941.97 | 62,303.42 | 51,334.42 | 192,470,815 | 192,470,815 |

### 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 7.60 | 5.90 | 8.70 | 100.00 | 0.00 | 0.00 | 100 | 0 | 0 |
| Strip Mall | 16.60 | 27.57 | 6.90 | 0.00 | 100.00 | 0.00 | 100 | 0 | 0 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 289.6861 | 11.4870 | 995.6818 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | 0.0000 | 1,799.1909 | 1,799.1909 | 1.7131 | 0.0000 | 1,842.0181 |
| Unmitigated | 289.6861 | 11.4870 | 995.6818 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | 0.0000 | 1,799.1909 | 1,799.1909 | 1.7131 | 0.0000 | 1,842.0181 |

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Winter

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 259.9093 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 29.7769 | 11.4870 | 995.6818 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | | 1,799.1909 | 1,799.1909 | 1.7131 | | 1,842.0181 |
| **Total** | **289.6861** | **11.4870** | **995.6818** | **0.0528** | | **5.5409** | **5.5409** | | **5.5409** | **5.5409** | **0.0000** | **1,799.1909** | **1,799.1909** | **1.7131** | **0.0000** | **1,842.0181** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 259.9093 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 29.7769 | 11.4870 | 995.6818 | 0.0528 | | 5.5409 | 5.5409 | | 5.5409 | 5.5409 | | 1,799.1909 | 1,799.1909 | 1.7131 | | 1,842.0181 |
| **Total** | **289.6861** | **11.4870** | **995.6818** | **0.0528** | | **5.5409** | **5.5409** | | **5.5409** | **5.5409** | **0.0000** | **1,799.1909** | **1,799.1909** | **1.7131** | **0.0000** | **1,842.0181** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

# FFTOD Specific Plan: Operations - Mobile Sources Only

**Los Angeles-South Coast County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Apartments Mid Rise | 12,110.00 | Dwelling Unit | 318.68 | 12,110,000.00 | 34635 |
| Strip Mall | 1,016.73 | 1000sqft | 23.34 | 1,016,730.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 33 |
| **Climate Zone** | 11 | | | **Operational Year** | 2035 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 390.98 | **CH4 Intensity (lb/MWhr)** | 0.033 | **N2O Intensity (lb/MWhr)** | 0.004 |

### 1.3 User Entered Comments & Non-Default Data

Project Characteristics - Mobile sources category only run.

Land Use - Entered all vehicle trips into two land uses for simplicity. All vehicles (non-trucks) entered into Apartments Mid Rise category and all truck trips entered in strip mall category.

Construction Phase - Mobile sources only run.

Off-road Equipment - Mobile sources only run.

Off-road Equipment - Mobile sources only run.

Trips and VMT - Mobile sources only run.

Architectural Coating - Mobile sources only run.

Vehicle Trips - Adjusted trip rates and trip lengths to match Total VMT and total daily trips per Fehr & Peers traffic study.

Woodstoves - Mobile sources only run.

Area Coating - Mobile sources only run.

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Energy Use - Mobile sources only run.

Water And Wastewater - Mobile sources only run.

Solid Waste - Mobile sources only run.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblArchitecturalCoating | ConstArea_Nonresidential_Exterior | 508,365.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Nonresidential_Interior | 1,525,095.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Exterior | 8,174,250.00 | 0.00 |
| tblArchitecturalCoating | ConstArea_Residential_Interior | 24,522,750.00 | 0.00 |
| tblAreaCoating | Area_Nonresidential_Exterior | 508365 | 0 |
| tblAreaCoating | Area_Nonresidential_Interior | 1525095 | 0 |
| tblAreaCoating | Area_Residential_Exterior | 8174250 | 0 |
| tblAreaCoating | Area_Residential_Interior | 24522750 | 0 |
| tblConstructionPhase | NumDays | 440.00 | 1.00 |
| tblConstructionPhase | NumDays | 6,200.00 | 1.00 |
| tblConstructionPhase | PhaseEndDate | 1/19/2037 | 12/1/2022 |
| tblConstructionPhase | PhaseEndDate | 9/5/2033 | 12/1/2022 |
| tblConstructionPhase | PhaseStartDate | 5/15/2035 | 12/1/2022 |
| tblConstructionPhase | PhaseStartDate | 12/1/2009 | 12/1/2022 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 6.26 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 3.23 | 0.00 |
| tblEnergyUse | NT24NG | 4,831.00 | 0.00 |
| tblEnergyUse | NT24NG | 0.49 | 0.00 |
| tblEnergyUse | T24E | 35.05 | 0.00 |
| tblEnergyUse | T24E | 3.58 | 0.00 |
| tblEnergyUse | T24NG | 4,179.80 | 0.00 |
| tblEnergyUse | T24NG | 1.14 | 0.00 |

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblFireplaces | NumberGas | 10,293.50 | 0.00 |
| tblFireplaces | NumberWood | 605.50 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 3.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 3.00 | 0.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 6.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 7.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 7.00 | 0.00 |
| tblOffRoadEquipment | UsageHours | 8.00 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 5,570.60 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 1,067.57 | 0.00 |
| tblTripsAndVMT | VendorTripNumber | 1,461.00 | 0.00 |
| tblTripsAndVMT | WorkerTripNumber | 9,045.00 | 0.00 |
| tblTripsAndVMT | WorkerTripNumber | 1,809.00 | 0.00 |
| tblVehicleTrips | CC_TL | 8.40 | 27.57 |
| tblVehicleTrips | CC_TTP | 64.40 | 100.00 |
| tblVehicleTrips | CNW_TTP | 19.00 | 0.00 |
| tblVehicleTrips | CW_TTP | 16.60 | 0.00 |
| tblVehicleTrips | DV_TP | 11.00 | 0.00 |
| tblVehicleTrips | DV_TP | 40.00 | 0.00 |
| tblVehicleTrips | HO_TTP | 40.60 | 0.00 |
| tblVehicleTrips | HS_TTP | 19.20 | 0.00 |
| tblVehicleTrips | HW_TL | 14.70 | 7.60 |
| tblVehicleTrips | HW_TTP | 40.20 | 100.00 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | |
|---|---|---|---|
| tblVehicleTrips | PB_TP | 3.00 | 0.00 |
| tblVehicleTrips | PB_TP | 15.00 | 0.00 |
| tblVehicleTrips | PR_TP | 86.00 | 100.00 |
| tblVehicleTrips | PR_TP | 45.00 | 100.00 |
| tblVehicleTrips | ST_TR | 4.91 | 5.01 |
| tblVehicleTrips | ST_TR | 42.04 | 1.60 |
| tblVehicleTrips | SU_TR | 4.09 | 4.17 |
| tblVehicleTrips | SU_TR | 20.43 | 0.78 |
| tblVehicleTrips | WD_TR | 5.44 | 5.55 |
| tblVehicleTrips | WD_TR | 44.32 | 1.69 |
| tblWater | IndoorWaterUseRate | 789,015,250.28 | 0.00 |
| tblWater | IndoorWaterUseRate | 75,311,754.77 | 0.00 |
| tblWater | OutdoorWaterUseRate | 497,422,657.78 | 0.00 |
| tblWater | OutdoorWaterUseRate | 46,158,817.44 | 0.00 |
| tblWoodstoves | NumberCatalytic | 605.50 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 605.50 | 0.00 |

## 2.0 Emissions Summary

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.1 Overall Construction

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | | | | |
|---|---|---|---|---|
| | | **Highest** | | |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 51.1555 | 1.4359 | 124.4602 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0248 | 204.0248 | 0.1943 | 0.0000 | 208.8813 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 25.9297 | 24.9917 | 256.2714 | 0.5451 | 72.3522 | 0.3131 | 72.6653 | 19.3094 | 0.2916 | 19.6010 | 0.0000 | 54,510.7095 | 54,510.7095 | 3.7070 | 2.2623 | 55,277.5407 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **77.0852** | **26.4276** | **380.7316** | **0.5517** | **72.3522** | **1.0057** | **73.3579** | **19.3094** | **0.9842** | **20.2936** | **0.0000** | **54,714.7343** | **54,714.7343** | **3.9013** | **2.2623** | **55,486.4220** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 51.1555 | 1.4359 | 124.4602 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0248 | 204.0248 | 0.1943 | 0.0000 | 208.8813 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 25.9297 | 24.9917 | 256.2714 | 0.5451 | 72.3522 | 0.3131 | 72.6653 | 19.3094 | 0.2916 | 19.6010 | 0.0000 | 54,510.7095 | 54,510.7095 | 3.7070 | 2.2623 | 55,277.5407 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **77.0852** | **26.4276** | **380.7316** | **0.5517** | **72.3522** | **1.0057** | **73.3579** | **19.3094** | **0.9842** | **20.2936** | **0.0000** | **54,714.7343** | **54,714.7343** | **3.9013** | **2.2623** | **55,486.4220** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

**Construction Phase**

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Building Construction | Building Construction | 12/1/2022 | 12/1/2022 | 5 | 1 | |
| 2 | Architectural Coating | Architectural Coating | 12/1/2022 | 12/1/2022 | 5 | 1 | |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 0 | 0.00 | 78 | 0.48 |
| Building Construction | Cranes | 0 | 0.00 | 231 | 0.29 |
| Building Construction | Forklifts | 0 | 0.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 0 | 0.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 0 | 0.00 | 97 | 0.37 |
| Building Construction | Welders | 0 | 0.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Building Construction | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 0 | 0.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.2 Building Construction - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 3.3 Architectural Coating - 2022

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 25.9297 | 24.9917 | 256.2714 | 0.5451 | 72.3522 | 0.3131 | 72.6653 | 19.3094 | 0.2916 | 19.6010 | 0.0000 | 54,510.7095 | 54,510.7095 | 3.7070 | 2.2623 | 55,277.5407 |
| Unmitigated | 25.9297 | 24.9917 | 256.2714 | 0.5451 | 72.3522 | 0.3131 | 72.6653 | 19.3094 | 0.2916 | 19.6010 | 0.0000 | 54,510.7095 | 54,510.7095 | 3.7070 | 2.2623 | 55,277.5407 |

### 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 67,226.24 | 60,675.94 | 50543.51 | 176,702,260 | 176,702,260 |
| Strip Mall | 1,715.73 | 1,627.48 | 790.91 | 15,768,555 | 15,768,555 |
| Total | 68,941.97 | 62,303.42 | 51,334.42 | 192,470,815 | 192,470,815 |

### 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 7.60 | 5.90 | 8.70 | 100.00 | 0.00 | 0.00 | 100 | 0 | 0 |
| Strip Mall | 16.60 | 27.57 | 6.90 | 0.00 | 100.00 | 0.00 | 100 | 0 | 0 |

### 4.4 Fleet Mix

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |
| Strip Mall | 0.521751 | 0.069666 | 0.195621 | 0.127727 | 0.025243 | 0.007470 | 0.011807 | 0.007489 | 0.000930 | 0.000550 | 0.027635 | 0.000756 | 0.003356 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 51.1555 | 1.4359 | 124.4602 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0248 | 204.0248 | 0.1943 | 0.0000 | 208.8813 |
| Unmitigated | 51.1555 | 1.4359 | 124.4602 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0248 | 204.0248 | 0.1943 | 0.0000 | 208.8813 |

FFTOD Specific Plan: Operations - Mobile Sources Only - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 47.4334 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 3.7221 | 1.4359 | 124.4602 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0248 | 204.0248 | 0.1943 | 0.0000 | 208.8813 |
| **Total** | **51.1556** | **1.4359** | **124.4602** | **6.6000e-003** | | **0.6926** | **0.6926** | | **0.6926** | **0.6926** | **0.0000** | **204.0248** | **204.0248** | **0.1943** | **0.0000** | **208.8813** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0000 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 47.4334 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 3.7221 | 1.4359 | 124.4602 | 6.6000e-003 | | 0.6926 | 0.6926 | | 0.6926 | 0.6926 | 0.0000 | 204.0248 | 204.0248 | 0.1943 | 0.0000 | 208.8813 |
| **Total** | **51.1556** | **1.4359** | **124.4602** | **6.6000e-003** | | **0.6926** | **0.6926** | | **0.6926** | **0.6926** | **0.0000** | **204.0248** | **204.0248** | **0.1943** | **0.0000** | **208.8813** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

### 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

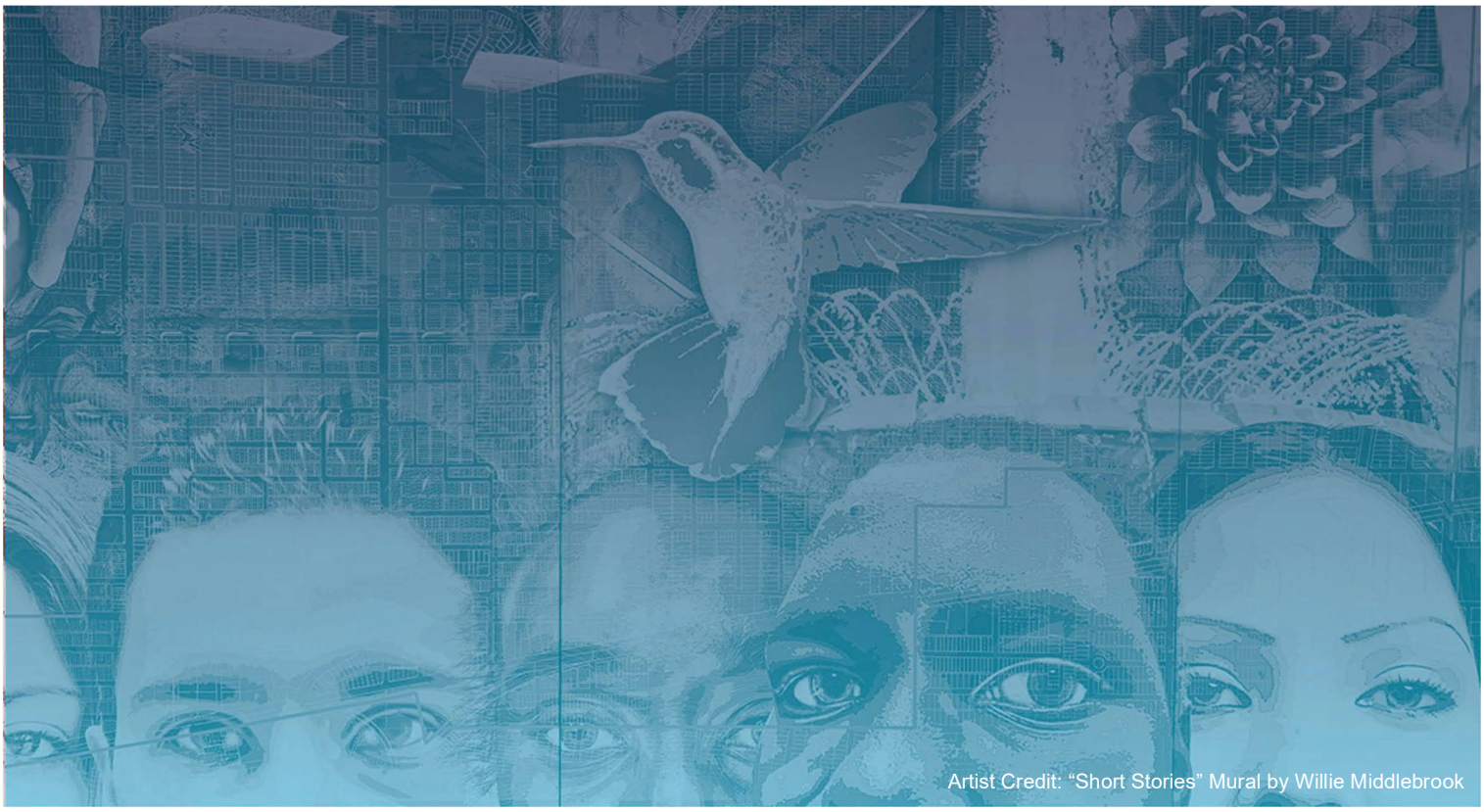
**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

# APPENDIX C

# CULTURAL RESOURCES TECHNICAL REPORT



Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Cultural Resources Technical Report

## Slauson Station TOC Specific Plan, aka Florence-Firestone TOD Specific Plan

Public Review Draft
September 2021

Prepared for:

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# 1.0 INTRODUCTION

This technical report addresses the potential impacts of the Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) on cultural and paleontological resources. It describes the environmental setting for cultural and paleontological resources and tribal cultural resources, the applicable regulatory framework, impacts of the project, and mitigation measures to reduce significant impacts.

Cultural resources are defined as prehistoric and historic sites, structures, districts, and landscapes, or any other physical evidence associated with human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or any other reason. Under the California Environmental Quality Act (CEQA), although not associated with past human activity, paleontological resources are included under cultural resources. For analysis purposes, cultural resources may be categorized into four groups: archaeological resources, historic resources (including architectural/engineering resources), Native American resources (although these may also be considered subsets of archaeological or historic resources), and paleontological resources.

Archaeological resources are places where human activity has measurably altered the earth or left deposits of physical remains. Archaeological resources may be either prehistoric-era (before European contact) or historic-era (after European contact). The majority of such places in California are associated with either Native American or Euro-American occupation of the area. The most frequently encountered prehistoric or historic Native American archaeological sites are village settlements with residential areas and sometimes cemeteries; temporary camps where food and raw materials were collected; smaller, briefly occupied sites where tools were manufactured or repaired; and special-use areas such as caves, rock shelters, and rock art sites. Historic-era archeological sites may include foundations or features such as privies, corrals, and trash dumps.

Historic resources include standing structures, infrastructure, and landscapes of historic or aesthetic significance that are generally 50 years of age or older. In California, historic resources considered for protection tend to focus on architectural sites dating from the Spanish Period (1529-1822) through World War II (WWII) and post-war era facilities; however, some resources may have achieved significance within the past 50 years if they meet the criteria for exceptional significance. Historic resources are often associated with archaeological deposits of the same age.

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the study of plant and animal fossils. Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. As defined in this technical report, paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints from a previous geologic period. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Tribal cultural resources can include—but are not limited to—archaeological resources, rock art, and the prominent topographical areas, features, habitats, plants, animals, and minerals that contemporary Native Americans value and consider essential for the preservation of their

traditional values. These locations are sometimes difficult to define and traditional culture often prohibits Native Americans from sharing these locations with the public.

# 2.0 ENVIRONMENTAL SETTING

## 2.1 PALEONTOLOGICAL SETTING

The entire FFTOD Specific Plan Area is mapped as Quaternary alluvium (Qa). This geologic unit consists of unconsolidated alluvial gravel, sand, and clay, mostly eroded from the Santa Monica Mountains and deposited by the Los Angeles River and its tributaries (Dibblee and Minch 2007; Jennings 1962). These younger Quaternary deposits date to the Holocene and are therefore too young to typically contain significant fossil deposits. Recent younger Quaternary alluvial deposits in the Los Angeles Basin can be up to 200 feet thick (Yerkes et al. 1965).

Older Quaternary alluvial deposits are anticipated to exist below the younger Quaternary alluvium at unknown depths. These deposits are not easily differentiated from the recent deposits that overlie them. Undisturbed older Quaternary alluvial deposits have yielded significant fossils throughout the Los Angeles Basin, including microfossils and fossil megafauna. Older Quaternary alluvial deposits close to the surface are typically considered of low sensitivity for significant fossils due to chemical and mechanical weathering, bioturbation, and anthropogenic disturbances. However, the sensitivity of undisturbed older Quaternary alluvial deposits for significant fossils is considered moderate to high, even at moderate depths, and increases with depth.

## 2.2 CULTURAL SETTING

### 2.2.1 Prehistoric Setting

Southern California is known to have been inhabited by native peoples at least 13,000 years Before Present (B.P.) (Arnold et al. 2004). The first evidence of human occupation in the Los Angeles area dates to at least 9000 B.P. and is associated with a period known as the Millingstone Cultural Horizon (Wallace 1955; Warren 1968). Millingstone populations established permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating after 5000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3500 B.P., a number of socioeconomic changes occurred which are associated with the period known as the Intermediate Horizon (Erlandson 1994; Wallace 1955; Warren 1968). Increasing population size required new technological innovations, such as the circular shell fishhook, the mortar and pestle, dart and atlatl, to maximize extraction of terrestrial and marine resources, resulting in a more diverse hunting capability (Erlandson 1994). The Intermediate Horizon marks a period during which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and nonutilitarian materials were acquired, and travel routes were extended.

The Late Prehistoric period, spanning from approximately 1500 B.P. to the Spanish mission era, is the period associated with the florescence of contemporary Native American groups. Native American villages were reported to have been most abundant near major rivers. But historically the region's major rivers frequently shifted their channels due to seasonal flooding as they wound through the Los Angeles Basin (Gumprecht 1999). A relict channel of the Los Angeles River, known in the nineteenth century as Arroyo del Pueblo, appears on the 1896 Downey 1:62500 USGS map less than 0.75-mile east of the FFTOD Specific Plan Area (USGS 1896).

The closest documented ethnohistoric site to the FFTOD Specific Plan Area is Tajauta. Tajauta is believed to have been a rancheria or small village situated beside a spring on what later became the Rancho Tajauta. The place name is associated with a landform consisting of a low rise between two watercourses on which three Native American archaeological sites have been documented. The Anastasio Avila adobe was also formerly situated on this landform, on the approximate location of today's Imperial Courts public housing complex, in the Watts neighborhood of the City of Los Angeles. The landform overlapped the boundary of the Cities of Lynwood, Los Angeles, and South Gate, and unincorporated LA County. The northernmost part of the landform is approximately 0.5-mile south of the southern boundary of the FFTOD Specific Plan Area (Beherec 2020:88-91; King 1993; McCawley 1996:57).

## 2.2.2 Historic Setting

### 2.2.2.1 Spanish Period

Spanish explorers made brief visits to Gabrieleno territory in both 1542 and 1602; on both occasions, the two groups exchanged trade items. Sustained contact with Europeans did not commence until after 1769, when Gaspar de Portolá and a small Spanish contingent explored the California coast from San Diego to Monterey. A string of 21 missions was established in the years that followed the Portolá expedition, including Mission San Gabriel Archangel in 1771 and Mission San Fernando Rey in 1797. By the early 1800s, the majority of the surviving Gabrieleno population had entered the mission system.

On September 4, 1781, El Pueblo de La Reina de Los Angeles was established; by 1786, the flourishing pueblo attained self-sufficiency, and funding by the Spanish government ceased (Gumprecht 1999). While the Spanish missions and pueblos developed in the 1780s, the Spanish crown also rewarded land grants to veterans of the California occupation army. Between 1784 and 1821, the development of ranchero society and land use under the Spanish distributed some of the best agricultural and ranching lands in California to private individuals. At least 30 ranchos and land concessions were granted, under conditions of settlement to occupy and use the land (Robinson 1948). The first was the 75,000-acre Rancho San Pedro, provisionally granted to Juan Jose Dominguez in 1784.

### 2.2.2.2 Mexican Period

Alta California became a state when Mexico won its independence from Spain in 1821. The authority of the California missions gradually declined, culminating with their secularization in 1834. Native Americans who had become dependent on the missions were disenfranchised and most Gabrieleno neophytes either fled to the north or sought work as laborers from nearby private landowners. Former mission lands were quickly divided and granted to private citizens for use as agricultural and pastoral land (Reid 1939 [1852]).

After 1834, the subdivision of lands into ranchos accelerated. As the possibility of a takeover of California by the United States (U.S.) loomed in the 1840s, Governor Pio Pico increased the number of land grants in a last-ditch effort to keep the land in Mexican hands. More than 600 rancho grants were made between 1833 and 1848.

In 1843, Governor Manuel Micheltorena granted one square league of land, including what would become Watts and Willowbrook, to Anastasio Avila (or Abila). As finally confirmed by the terms of the Treaty of Guadalupe Hidalgo, the grant was bounded roughly by the present-day streets of Manchester Avenue/Firestone Boulevard to the north, Rosecrans Boulevard to the south, Central Avenue to the west, and Alameda Street to the east; therefore, the area partially overlapped the FFTOD Specific Plan Area. The actual land grant was much larger and extended from the western border of Lugo's Rancho San Antonio all the way to the eastern border of Rancho Sausal Redondo in modern-day Inglewood, the property of Anastasio Avila's son, Antonio Ygnacio Avila. A surviving Diseño del Rancho Tajauta shows that, as it was originally granted, the rancho included the heights in the vicinity of today's Westmont and West Athens (Adler 1977; U.S. District Court [California: Southern District] 1854).

#### 2.2.2.3 American Period

The U.S. took control of California after the Mexican–American War of 1846 and seized Monterey, San Francisco, San Diego, and Los Angeles (then the state capital) with little resistance. Local unrest soon bubbled to the surface, and Los Angeles slipped from U.S. control in 1847. Hostilities officially ended with the signing of the Treaty of Guadalupe Hidalgo in 1848; the U.S. agreed to pay Mexico $15 million for the conquered territory that included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. The conquered territory represented nearly half of Mexico's pre-1846 holdings. California joined the U.S. in 1850 as the 31st state (Wilkman and Wilkman 2006:15).

The discovery of gold in California led to an enormous influx of American citizens in the 1850s and 1860s, and these settlers rapidly displaced the old rancho families. Newcomers continued to pour into Los Angeles and the population nearly doubled between 1870 and 1880. The completion of the second transcontinental line, the Santa Fe, took place in 1886 causing a fare war that drove fares to an unprecedented low. More settlers continued to head west and the demand for real estate skyrocketed. The city's population rose from 11,000 in 1880 to 50,000 by 1890 (Meyer 1981:45).

The beginning of the twentieth century saw the florescence of a uniquely suburban metropolis, where a vast network of residential communities overshadowed city centers, the single-family home was valued over the high-rise, and private space took precedence over public space (Hawthorne 2006). The pleasant Mediterranean climate and development of industries, including the war industry and the movie industry, brought jobs and people to the greater Los Angeles area. Inexpensive automobiles gained popularity in the 1920s, soon creating tremendous congestion in the centers of cities and necessitating alternate transportation routes. The Arroyo Seco Parkway, connecting Los Angeles to Pasadena, was among the earliest "express auto highways" in the U.S., opening in December 1940 (Balzar 2006). Dozens of freeways were constructed in the post-war era, radically altering the character of Los Angeles by simultaneously dividing local neighborhoods and connecting outlying communities.

During the first 3 decades of the twentieth century, more than 2 million people moved to LA County, transforming it from a largely agricultural region into a major metropolitan area. By 1945, Los Angeles had

undertaken 95 annexations, expanding from a 28-square-mile agrarian pueblo into a densely populated city covering more than 450 square miles (Robinson 1979:245).

#### 2.2.2.4 Florence-Firestone Community History

The following is excerpted from the 2019 *Florence-Firestone Community Plan* (County of Los Angeles 2019):

> *Turn of the Century*
>
> The area that is now Florence-Firestone once contained farmland that yielded abundant crops of sweet potatoes, grain, and corn watered by artesian wells. Grape vineyards were common, as were eucalyptus groves planted for firewood. Farms in the area ranged in size from 40 to several hundred acres.
>
> In 1869, a rail line paralleling Alameda Street from Los Angeles to Wilmington was completed by the Southern Pacific Railroad. In 1876, the trans-continental rail line was completed, connecting the area to the nationwide rail system. The unincorporated districts of Florence and Graham were established as outposts along these rail lines. Southern Pacific and Pacific Electric Railroads had stops along Florence Avenue and Graham Avenue. The name Florence- Firestone may have originated from these outposts. In 1877, the first post office in Florence-Firestone was established. With the construction of the Pacific Electric inter-urban line red cars, which ran from Los Angeles to Long Beach along Graham Avenue, the area had additional regional rail connections by 1902.
>
> Development initially occurred around the rail and streetcar lines. During the 1800s and early 1900s, development was concentrated between Compton Avenue and Alameda Street. In the 1920s, the community started spreading eastward and westward and was almost completely built out by the 1940s. The 1960 Census indicated that 72% of all housing in the community was constructed before 1940. Many of the structures built between the 1920s and 1940s remain today.
>
> Portions of Florence-Firestone have, in previous times, been identified by different place names. Graham, Starks Palm, Central Gardens, Roosevelt Park, Gage-Holmes and Firestone Park Zoned Districts were all named after previously existing neighborhoods in Florence-Firestone. Watts, an adjacent community to the south, was incorporated as an independent city in 1907 and was annexed to the City of Los Angeles in 1926.
>
> *Early 1900's*
>
> The rail line and proximity to ocean ports made Florence-Firestone and its surrounding areas an ideal location for factories, with abundant manufacturing jobs in the early 1920s. Goodyear Tire Company opened in 1920 on Central Avenue in the City of Los Angeles near the community's boundary. In 1927 Firestone Tire and Rubber Manufacturers opened a plant at the intersection of Firestone Boulevard and Alameda Street in South Gate also near the community's boundary.

At its peak, Goodyear Tire employed over 2,500 people and operated 24 hours a day. In addition to the tire and rubber plants, steel manufacturers, automobile assembly plants, derrick and equipment companies, and other manufacturing companies provided a variety of good jobs for the community. This in turn supported a vibrant commercial district, with three movie theaters opening in the community in the 1930s, two on Florence Avenue and one on Compton Avenue. The onset of World War II brought additional manufacturing jobs to the area with the growth of the defense industry. However, after World War II the defense industry declined and manufacturers transitioned to the auto industry.

*Post War II Years*

In 1948, the "whites-only" housing covenants were lifted in the Los Angeles area and African-Americans began to purchase and rent homes in the recently desegregated parts of the community. Racial tensions began to grow, eventually leading to violence in the 1950's when white residents bombed, fired into, or burned crosses on the lawns of African-Americans' homes. In response, African-American boys formed clubs for protection and the first gangs were established.

In the 1960s, the community was affected by deindustrialization. Factories began to move to outlying areas where there was more space, cheaper land, and less of the perceived social ills of the urban core. Residents and retail establishments followed, resulting in lower rents in the community. The job base, once supported by a strong manufacturing presence, shifted increasingly to lower-wage, service-sector jobs with less stable local employment options. At the same time, the community underwent its first major demographic shift.

Between 1950 and 1965 the African-American population increased from 18% to 57% of the total population. The 1960s was also a time of civil unrest surrounding the Civil Rights Movement and protest against the Vietnam War. In Los Angeles, racial tensions stemming from racial injustices, discrimination, and economic hardship led to the Watts Riot of 1965.

*Recent Development*

Deindustrialization continued into the 1970s and 1980s, resulting in widespread unemployment in the area. The Goodyear and Firestone plants closed in 1982, leading to a massive loss of jobs.

In the 1980s and 1990s, there were significant population shifts in Florence-Firestone spurred by immigration from South and Central America. People of Hispanic origin represented 61% of the population in 1980, 77% in 1990, 86% in 2000, and 91% in 2016. The African-American population in Florence-Firestone declined from 60% in the 1960s to 9% by 2016.

The commercial and industrial makeup of the community changed as well. Unable to compete with new, outlying industrial parks in suburban locations, industry and jobs continued to decline. Physical constraints, such as narrow or shallow lot depths, and competition from large shopping malls further contributed to the

decline of Florence-Firestone's historical commercial corridors. The effects can still be seen today with an increasing vacancy rate, closed storefronts, vacant lots, and abandoned buildings. Although, the lower commercial rents have enabled the establishment of small, locally-owned businesses.

Florence-Firestone has been the subject of several studies and reports conducted by LA County, dating back to the 1970s. In 1970 and 1971, the community was one of two Model Neighborhoods under LA County's Model Cities program administered by the Department of Urban Affairs. This program sought to coordinate urban services. A community plan background study and staff report was developed in 1971, with the intention to adopt a community plan. However, the community plan was not adopted at the time, perhaps due to the proposal to construct two freeways through the community, the east-west Route 90 along Slauson Avenue and the north-south Route 47 along Industrial Avenue. These freeways were not built and the community plan was also not finalized.

In 1990, the Los Angeles Metropolitan Transit Authority (MTA) opened the 22-mile Metro A Line (previously Metro Blue Line), connecting Downtown Los Angeles and the City of Long Beach. The Metro A Line is the system's first and longest rail line. The Metro A Line runs through the community, with three stops located at Slauson, Florence, and Firestone. The line provides an important north-south connection to jobs and opportunities throughout the Los Angeles region. At a total cost of $877 million, the Metro A Line represents the most recent major infrastructure investment in the community.

In 1992, South Central Los Angeles was affected by civil unrest that occurred in part as a response to the acquittal of four police officers accused of beating Rodney King. The six days of unrest that followed were also a result of widespread structural inequalities, including economic disparity, poverty, high unemployment, as well as a nationwide recession and breakdown of social institutions. In Florence-Firestone, several businesses suffered considerable damage, with losses concentrated heavily in commercial areas along major corridors, especially on Florence and Central Avenues.

In 2002, in an effort to improve services to the community, LA County formed the Florence-Firestone Community Enhancement Team (FFCET). Comprised of staff from various County agencies, collaborators from the community, nonprofit organizations, and other stakeholders, the FFCET sought to provide integrated services and prioritize service enhancements. The FFCET provided a forum for community members and County service providers to come together to discuss issues, identify solutions, and work together for the betterment of the community. Completed projects initiated by the FFCET include: expansion of park youth programs; initiation of a Sheriff's Special Enforcement Team to abate gang violence; publication of a resource guide, the Community Connection; coordination of street sweeping, garbage collection, and parking enforcement; installation of roadway and pedestrian lighting and 1,450 new street name signs; formation of the first unincorporated area Business Improvement District; formation of a Community Standards District; and enhancement of code enforcement efforts.

> In 2010, the County opened the newly renovated Florence-Firestone Service Center. The center provides comprehensive social services to neighborhood residents which include elderly care, emergency food assistance, internship opportunities, and mediation and conflict resolution. Many County departments and other public and private agencies have satellite offices at the center.

The Black community in Los Angeles has been shaped and reshaped by successive influxes of migrants from other states since 1781 (City of Los Angeles 2018). Though remaining a small part of the total Los Angeles population, from 1890 to 1900 the Black population grew by almost 40% from 1,258 to 2,131 as the general population grew by almost 51% to 102,479 (City of Los Angeles 2018).

In the 1950s, the identity of the area south of downtown transitioned from multiethnic/multiracial eastside to nearly all-Black (Grimes 2009). The middle-class Black community began moving out of the Central Avenue vicinity into contiguous neighborhoods to the west and south to what became commonly known as “South Central" (Grimes 2009). This area included the neighborhoods of Avalon, South Vermont, and Watts, and the unincorporated communities of Florence, Westmont and Willowbrook. In the 1950s, Blacks who settled here were both blue-collar and professionals (Grimes 2009). South Central Los Angeles was historically at the heart of the Black community in Los Angeles (Taniguchi 2004). Central Avenue was considered a hot spot for the jazz scene during its heyday from the 1920s to the 1950s (Taniguchi 2004). The construction of the Harbor Freeway starting from the mid-1950s contributed to changes to the tight-knit nature of the community and an economic downturn for the area.

By the 1970s, many of the blue-collar jobs in South Central closed due to international competition and the employment opportunities they once provided moved overseas or disappeared (City of Los Angeles 2018). The narrowing of industrial employment impacted all American workers but especially Black workers (City of Los Angeles 2018). New manufacturing jobs were developing but because of the continued housing discrimination in the suburbs, inadequate training and education, and poor transportation, the economic opportunities for many working-class Blacks were stymied (City of Los Angeles 2018). Their segregation became more entrenched in the neighborhoods of South Los Angeles (City of Los Angeles 2018).

#### 2.2.2.5 Florence-Firestone Community Resource Types

The FFTOD Specific Plan Area largely comprises single-family residential neighborhoods. The neighborhoods in Florence and Graham/ Firestone Park feature concentrations of early twentieth century single-family residences interspersed with commercial and industrial corridors. These neighborhoods developed primarily due to their proximity to historic streetcar routes. Though they were near streetcar lines, these neighborhoods often featured accommodation for automobiles, such as detached garages and paved driveways.

Many of the residential buildings in the FFTOD Specific Plan Area have been altered over time with changes such as replacement windows and doors, stucco finish over original wall cladding materials, and the removal of features such as window surrounds and trim.

Multifamily residences in the FFTOD Specific Plan Area are intermittently situated in predominantly single-family residential neighborhoods. Multifamily development typically consists of duplexes, fourplexes, and small apartment buildings. Scattered throughout the FFTOD

Specific Plan Area are bungalow courts from the early twentieth century, designed in a variety of popular architectural styles including craftsman and mission revival.

Commercial property types are found on the major thoroughfares running north-south along Compton Avenue and east-west along Slauson Avenue, Florence Avenue, Nadeau Street, and Firestone Boulevard. The commercial buildings included one- and two-story commercial block buildings and mid-twentieth century storefronts. The historic-period industrial development in the FFTOD Specific Plan Area is largely concentrated along Maie Avenue and Wilmington Avenue and includes factories, warehouses, and storage sites.

The FFTOD Specific Plan Area also has a number of institutional property types. These properties include churches, schools, and government buildings such as the Century Sheriff's Youth Activity League, the Los Angeles County Probation Building, and the Los Angeles County Department of Public Social Services.

### 2.2.3 Tribal Cultural Setting

The FFTOD Specific Plan Area is within the present-day Los Angeles Basin, which is associated with the traditional territory of the prehistoric and protohistoric Native American populations generally referred to as the Gabrieleno/Tongva. The Gabrieleno/Tongva society is identified by Late Prehistoric/Protohistoric ethnographic records, and archaeological data identify Late Prehistoric occupation of Southern California. The term Gabrieleno refers to Native American populations that were under the jurisdiction of the Mission San Gabriel de Archangel. Mission San Gabriel serviced the entire Los Angeles Basin and into the San Bernardino area. The present-day city of Los Angeles is somewhat centrally situated in the ethnographic boundaries for the Gabrieleno, and the core area of the Los Angeles Basin was the site of the historical city of Los Angeles and the ethnographic village of Yangna. Following the founding of the Pueblo de Los Angeles, a large Catholic church (Church of Our Lady the Queen of the Angels) was constructed to service the small but sedentary population of the pueblo, including Native Americans and early European settlers (primarily Spanish/Mexican, but also many others). Evidence of the prehistoric occupation of the area, including the village of Yangna, has been sporadically identified, and the native populations became known as Gabrielenos. The FFTOD Specific Plan Area is in the southern areas of Gabrieleno territory (DRP 2018).

## 2.3 EXISTING CULTURAL RESOURCES

### 2.3.1 Records Search Results

A records search for the FFTOD Specific Plan Area was conducted on May 13, 2021, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) at the California State University, Fullerton. The records search included a review of all recorded resources including archaeological sites and built-environment resources within the entire FFTOD Specific Plan Area, as well as a review of cultural resource reports on file. The archival research included review of previously recorded archaeological site records and reports, historic site and property inventories, and historic maps. Inventories of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Office of Historic Preservation's Built Environment Resources Directory (BERD), California Historical Landmarks and Points of Interest, and the list of City of Los Angeles Historic-Cultural

Monuments (LAHCMs) were also reviewed to identify cultural resources within the FFTOD Specific Plan Area.

#### 2.3.1.1 Previous Cultural Resources Investigations Reports

A total of 44 previous cultural resources investigations documented at the SCCIC have been conducted within the FFTOD Specific Plan Area (Table 2-1). These investigations include surveys, records searches, and submissions.

**Table 2-1: Previous Cultural Resources Investigations Conducted in the FFTOD Specific Plan Area**

| Author | Report # | Title | Date |
|---|---|---|---|
| Wlodarski, Robert J. | LA-02577 | Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, LA County California | 1992 |
| Wlodarski, Robert J. | LA-02644 | Results of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, LA County, California | 1992 |
| Anonymous | LA-02950 | Consolidated Report: Cultural Resources Studies for the Proposed Pacific Pipeline Project | 1992 |
| Maki, Mary K | LA-03036 | A Phase 1 Cultural Resources Survey of 0.66-acre at 2004 E. 88th Street, LA County, California | 1994 |
| Maki, Mary K | LA-04004 | Negative Phase 1 Archaeological Survey for the 2nd District Infill Housing Project/ #g89203 at 6024 South Hooper Avenue, LA County, California | 1998 |
| Anonymous | LA-04097 | Council District Nine Revitalization/recovery Program Final Environmental Impact Report | 1995 |
| Unknown | LA-04470 | Negative Phase I Archaeological Survey and Impact Assessment of .65 Acre for the Latchford Glass Phase II Project LA County, California | 1999 |
| Starzak, Richard | LA-04625 | Historic Property Survey Report for the Proposed Alameda Corridor from the Ports of Long Beach and Los Angeles to Downtown Los Angeles in LA County, California | 1994 |
| Maki, Mary K. | LA-04737 | Negative Phase I Archaeological Survey and Impact Assessment of .9 Acres for the 7300 Roseberry Avenue Housing Project CDC Project No. JJ7101, HMD001, G89101, Florence, LA County, California | 1999 |
| Ashkar, Shahira | LA-04834 | Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, LA and Orange Counties | 1999 |
| Science Applications International Corporation | LA-04836 | Phase 1 Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project | 2000 |
| Maki, Mary K. | LA-05572 | Negative Phase 1 Archaeological Survey and Impact Assessment of Approximately 0.5 Acre for the Holmes Childcare Center Project 6122 Holmes Avenue Florence, LA County, California | 2000 |
| Wells, Helen Fairman | LA-05577 | Phase 1 Cultural Resources Investigation of Franklin Delano Roosevelt Park LA County, California | 1996 |
| Duke, Curt | LA-05685 | Cultural Resource Assessment Cingular Wireless Facility No. Sm 066-03 LA County, California | 2002 |
| Maki, Mary K. | LA-07059 | Phase 1 Archaeological Survey Report of 1.64 Acres for the Gage Village Housing Development Project Gage Avenue, Florence, LA County, California | 2003 |
| Marvin, Judith and Curt Duke | LA-07068 | Cultural Resource Assessment AT&T Wireless Services Facility No. 04095a LA County, California | 2002 |
| Bonner, Wayne H. | LA-07405 | Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate LA60XC157A (Florence Verizon) 7200 South Central Avenue, Los Angeles, LA County, California | 2004 |

| Author | Report # | Title | Date |
|---|---|---|---|
| Bonner, Wayne H. | LA-07625 | Cultural Resources Records Search and Site Visit Results for Sprint Facility Candidate LA70XC112B (Mercado Del Pueblo), 6270 Wilmington Avenue, LA County, California | 2005 |
| Bonner, Wayne H. | LA-07627 | Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate LA60X180C (Mitchell) 7702 Maie Avenue, Los Angeles, LA County, California | 2004 |
| Bonner, Wayne H. | LA-07637 | Cultural Resources Records Search Results and Site Visit for T-Mobile USA Candidate LA03051A (California Body Shop), 9303 South Alameda Street, Los Angeles, LA County, California | 2006 |
| Bonner, Wayne H. | LA-07638 | Cultural Resources Records Search Results and Site Visit for T-Mobile USA Candidate LA03341C (Naomi SCE Substation), 7101 Compton Avenue, Los Angeles, LA County, California | 2006 |
| Bonner, Wayne H. | LA-07643 | Records Search, Site Visit, and Direct and Indirect Historic Architectural Assessment for Cingular Telecommunications Facility Candidate SM-341-03 (Jems Ent Building) 1560 East Florence Avenue, Los Angeles, LA County, California | 2004 |
| Maki, Mary K. | LA-07665 | CDC-Slauson Station Apartments | 2005 |
| Maki, Mary K. | LA-07667 | Phase 1 Archaeological Investigation of 18.3 Acres for the Florence & Alameda Commercial Center Project Walnut Park, LA County, California | 2004 |
| Maki, Mary K. | LA-07671 | Phase 1 Archaeological Investigation of 0.34 Acre for the 6305 Holmes Avenue Construction Project Florence, Los Angeles County, California | 2004 |
| Bonner, Wayne H. | LA-07703 | Indirect APE Historic Architectural Assessment for Sprint Telecommunications Facility Candidate LA60XC157A (Florence Verizon) 7200 South Central Avenue, Los Angeles, LA County, California | 2004 |
| Tang, Bai "Tom", Michael Hogan, and Casey Tibbet | LA-07867 | Historic-period Building Survey South Region High School #2 Project in an Unincorporated Area Near the City of Los Angeles, LA County, California | 2005 |
| Livingstone, David M., McDougall, Dennis, Goldberg, Susan K., and Nettles, Wendy M. | LA-07952 | Trails to Rails: Transformation of a Landscape: History and Historical Archaeology of the Alameda Corridor Volume 1 | 2006 |
| Bonner, Wayne H. and Kathleen A. Crawford | LA-07987 | Direct Ape Historic Architectural Assessment for T-Mobile USA Candidate LA03341C (Naomi SCE Substation), 7101 Compton Avenue, Los Angeles, LA County, California | 2006 |
| Arrington, Cindy and Nancy Sikes | LA-08255 | Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II | 2006 |
| Shaver, Noelle C.S. | LA-08499 | A Phase I Archaeological Study for the South Region High School No. 13, Community of Walnut Park, Unincorporated Los Angeles County, California | 2007 |
| Bonner, Wayne H. | LA-08766 | Cultural Resources Records Search and Site Visit Results for Global Signal Candidate 3019372 (Salome), Located at 1150 East 58th Place, Los Angeles, LA County, California | 2006 |
| Bonner, Wayne H. | LA-08853 | Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA13082A (Leon Elster), 8145 Beach Street, Los Angeles, LA County, California | 2006 |
| King, Phil V. | LA-08955 | Final Report for Year Three Historical and Cultural Resources Survey of Los Angeles: Sylmar, Watts, Crenshaw, and Vermont/ Slauson | 1983 |
| Bonner, Wayne H. | LA-09190 | Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA03051D (SCE Caldon), Near 8866 Juniper Street, Southeast Corner of 88th Street and Juniper Street, Los Angeles, LA County, California | 2007 |

| Author | Report # | Title | Date |
|---|---|---|---|
| Maki, Mary K. | LA-09640 | Alameda Seniors Housing Project, Huntington Park | 2008 |
| Smith, Francesca and Caprice D. Harper | LA-09641 | Cultural Resources Initial Technical Report and Phase I Site Investigation Proposed South Region Middle School No. 3 Project, Walnut Park, LA County, California | 2008 |
| Smith, Francesca and Caprice D. Harper | LA-09642 | Cultural Resources Intensive Survey Report, Proposed South Region Middle School No. 3 Project, Walnut Park, LA County, California | 2008 |
| Horne, Melinda C., M. Colleen Hamilton, and Susan K. Goldberg | LA-10524 | Alameda Corridor Project Treatment Plan for Historic Properties Discovered During Project Implementation, Second Draft. Addendum to Finding of Effect (February 21, 1995: October 27, 1998) | 2000 |
| Brunzell, David | LA-10593 | Cultural Resources Assessment – Jordan Downs Specific Plan Project, Watts Community of Los Angeles, California | 2010 |
| Lewicki, Pauline | LA-11754 | Wattstar Theater and Education Center Addendum to the Initial Study/Mitigated Negative Declaration, Community Redevelopment Agency of the City of Los Angeles | 2010 |
| Brunzell, David | LA-11755 | Cultural Resources Assessment Wattsatr Cinema and Education Center Project Watts Community of Los Angeles, California | 2010 |
| Shaffer, Caleb | LA-11966 | Consultation Under Section 106 of the National Historic Preservation Act of a Federal Permitting Project at Clean Harbors Los Angeles | 2012 |
| Anderson, Katherine | LA-12798 | Los Angeles Unified School District Five Campus Building Inventory, City of Los Angeles, California | 2014 |

### 2.3.1.2 Previously Recorded Cultural Resources

The SCCIC records search identified 59 previously recorded cultural resources mapped within the FFTOD Specific Plan Area (Table 2-2; Appendix B). Of these resources, five are archaeological resources including historic-period building foundations and refuse deposits.

**Table 2-2: Previously Recorded Cultural Resource Sites within the FFTOD Specific Plan Area**

| Primary Number (P-19-) | Historic Name/ Description | Construction Date / Time Period | Date Originally Recorded | Eligibility / NRHP Status Code |
|---|---|---|---|---|
| 002838 | Historic-period brick foundation or footing | 1880-1945 | 2000 | Unevaluated |
| 002839 | Historic-period refuse deposit | 1880-1945 | 2000 | Unevaluated |
| 002840 | Historic-period brick foundation or footing | 1880-1945 | 2000 | Unevaluated |
| 002847 | Historic-period brick foundation or footing | 1880-1945 | 2000 | Unevaluated |
| 002856 | Historic-period refuse deposit | 1914-1945 | 2000 | Unevaluated |
| 176186 | Miramonte Elementary School | 1936-1937 | 1996 | NRHP eligible / 2S2 |
| 186110 | Union Pacific Railroad | 1905 | 1999 | NRHP eligible / 3S |
| 187085 | The Mojave Road | Prehistoric/historic | 1985 | NRHP eligible / 1CS |
| 187087 | Pacific Electric Railway Firestone Boulevard Grade Separation/ Graham Avenue Underpass | 1937 | 1986 | Not Eligible / 7P |
| 187500 | Spanish Colonial Revival style commercial property | 1947 | 2004 | Not eligible / 6Y |
| 187700 | Streamline Moderne commercial property | 1941 | 2004 | Not eligible / 6Y |

| Primary Number (P-19-) | Historic Name/ Description | Construction Date / Time Period | Date Originally Recorded | Eligibility / NRHP Status Code |
|---|---|---|---|---|
| 187755 | Spanish Eclectic style multiple-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187756 | Neoclassical style single-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187757 | Neoclassical style single-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187758 | Modern style multiple-family property | c. 1949 | 2005 | Not eligible / 6Z |
| 187759 | Modern style multiple-family property | c. 1940 | 2005 | Not eligible / 6Z |
| 187760 | Queen Anne style single-family property | 1903 | 2005 | Not eligible / 6Z |
| 187761 | Spanish Eclectic style multiple-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187762 | Modern style multiple-family property | c. 1955 | 2005 | Not eligible / 6Z |
| 187763 | Spanish Eclectic style multiple-family property | c. 1929 | 2005 | Not eligible / 6Z |
| 187764 | Spanish Eclectic style multiple-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187765 | Modern style multiple-family property | 1955 | 2005 | Not eligible / 6Z |
| 187766 | Craftsman style multiple-family property | c. 1925 | 2005 | Not eligible / 6Z |
| 187767 | Folk Victorian single-family property | c. 1902 | 2005 | Not eligible / 6Z |
| 187768 | Spanish Eclectic style single-family property | c. 1923 | 2005 | Not eligible / 6Z |
| 187769 | Craftsman style single-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187770 | Spanish Eclectic style multiple-family property | c. 1924 | 2005 | Not eligible / 6Z |
| 187771 | Vernacular multiple-family property | c. 1923 | 2005 | Not eligible / 6Z |
| 187772 | Spanish Eclectic style multiple-family property | c. 1927 | 2005 | Not eligible / 6Z |
| 187773 | Vernacular with Italianate influences multiple-family property | c. 1927 | 2005 | Not eligible / 6Z |
| 187774 | Vernacular commercial property | c. 1948 | 2005 | Not eligible / 6Z |
| 187775 | Vernacular commercial property | c. 1946 | 2005 | Not eligible / 6Z |
| 187776 | Vernacular with Western false front commercial property | c. 1947 | 2005 | Not eligible / 6Z |
| 187777 | Vernacular commercial property | c. 1932 | 2005 | Not eligible / 6Z |
| 187778 | Vernacular commercial property | c. 1920 | 2005 | Not eligible / 6Z |
| 187779 | Vernacular with Western false front commercial property | c. 1925 | 2005 | Not eligible / 6Z |
| 187780 | Vernacular commercial property | c. 1925 | 2005 | Not eligible / 6Z |

| Primary Number (P-19-) | Historic Name/ Description | Construction Date / Time Period | Date Originally Recorded | Eligibility / NRHP Status Code |
|---|---|---|---|---|
| 187781 | Vernacular commercial property | c. 1928 | 2005 | Not eligible / 6Z |
| 187782 | Vernacular with Western false front commercial property | c. 1920 | 2005 | Not eligible / 6Z |
| 187783 | Vernacular commercial property | 1948 | 2005 | Not eligible / 6Z |
| 187784 | Vernacular commercial property | c. 1949 | 2005 | Not eligible / 6Z |
| 187785 | Vernacular with Mission style influences | c. 1924 | 2005 | Not eligible / 6Z |
| 187786 | Western Barn with Art Deco influence commercial property | c. 1938 | 2005 | Not eligible / 6Z |
| 187787 | Vernacular commercial property | c. 1925 | 2005 | Not eligible / 6Z |
| 187788 | Vernacular commercial property | c. 1942 | 2005 | Not eligible / 6Z |
| 187789 | Vernacular with Art Deco influence commercial property | c. 1924 | 2005 | Not eligible / 6Z |
| 187790 | Vernacular commercial property | 1946 | 2005 | Not eligible / 6Z |
| 187791 | Vernacular commercial property | c. 1949 | 2005 | Not eligible / 6Z |
| 187792 | Vernacular commercial property | c. 1952 | 2005 | Not eligible / 6Z |
| 187793 | Mission Revival style multiple-family property | c. 1923 | 2005 | Not eligible / 6Z |
| 187864 | Modern style commercial property | 1942 | 2004 | Not eligible / 6Y |
| 187865 | Modern style commercial property | c. 1958 | 2004 | Not eligible / 6Y |
| 187965 | Art Moderne style substation | c. 1929 | 2006 | Not eligible / 6Y |
| 188399 | Colonial Revival style single-family property | 1926 | 2008 | Not eligible / 6Z |
| 188400 | Spanish Eclectic style single-family property | 1939 | 2008 | Not eligible / 6Z |
| 188779 | Jordan Downs Public Housing Project, multiple-family property | 1942-1954 | 2010 | Not eligible / 6Y |
| 188983 | Boulder Dam – Los Angeles 287.5kV Transmission Line | 1936-1953 | 1999 | NRHP eligible / 2B |
| 190949 | Paul R. Williams/ Parkside Manor Historic District | 1944-1952 | n.d. | NRHP eligible |
| 190953 | Graham Elementary School | 1925-1968 | 2014 | Not eligible / 6Z |

Notes:
1CS = Individually listed in the CRHR by the State Historical Resources Commission (SHRC).
2B = Determined eligible for NRHP both individually and as a contributor to a NRHP eligible multi-component resource like a district in a federal regulatory process. Listed in the CRHR.
2S2 = Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR.
3S = Appears eligible for NRHP individually through survey evaluation.
6Y = Determined ineligible for NRHP by consensus through Section 106 process. Not evaluated for CRHR or local listing.
6Z = Found ineligible for NRHP, CRHR or local designation through survey evaluation.
7P = California State Point of Historical Interest that does not meet CRHR criteria.
c. = circa
CRHR = California Register of Historical Resources

Of the 59 previously recorded cultural resources, the SCCIC records search identified five NRHP eligible resources within the FFTOD Specific Plan Area. These resources are detailed below:

- Miramonte Elementary School (P-19-176186)

The Miramonte Elementary School main building and auditorium were identified in 1996 for their architectural significance (P-19-176186). The buildings were constructed in 1936 and 1937 in the Mediterranean revival style designed by the architectural firm Howell and Winslow. The resource is eligible for the NRHP and is listed in the CRHR.

- Union Pacific Railroad (P-19-186110)

  The Union Pacific Railroad was constructed between 1869 and 1905 and includes portions of the first transcontinental railroad and is significant for its association with the development of Los Angeles (P-19-186110). For a separate project, in 2019, the SHPO recommended that the Union Pacific Railroad (P-19-186110) as a whole should be assumed eligible for the NRHP (Feldman 2019). For the purpose of the analysis in this technical report, the Union Pacific Railroad is assumed eligible for the NRHP.

- Mojave Road (P-19-187085)

  The NRHP-eligible Mojave Road (P-19-187085) is the historic road that connected the U.S. Army Headquarters for Southern California and Arizona Territory at Wilmington, California with Fort Mojave, Arizona (California Registered Historical Landmark # 963). Within the FFTOD Specific Plan Area, the Mojave Road is generally along the alignment of the existing railroad.

- Boulder Dam – Los Angeles 287.5kV Transmission Line (P-19-188983)

  The Boulder Dam-Los Angeles 287.5 kV Transmission Line (P-19-188983) was evaluated for NRHP eligibility in 1999 and found eligible under Criteria A and C, significant for its association with the construction of Boulder Dam, as well as for its association with the industrial, economic, and urban development that occurred in metropolitan Los Angeles from the mid-1930s through the 1940s. The resource is also significant for its unique engineering and structural characteristics.

- Paul R. Williams / Parkside Manor Historic District (P-19-190949)

  The Paul R. Williams / Parkside Manor Historic District (P-19-190949) was constructed between 1944 and 1952. The resource was found eligible for listing in the NRHP under Criteria A and C at the local level of significance as a unique example of community planning in the Watts area with residences designed by architect Paul R. Williams. The district is one of the first and only planned neighborhoods in the Watts area and was among the few developments in Los Angeles built to provide quality single-family housing for the Black community during World War II (HRG n.d.).

## 2.3.2 Built Environment Resources Directory

The BERD provides information regarding nonarchaeological resources. This inventory is organized by street; a total of 39 previously recorded built-environment resources were identified within the FFTOD Specific Plan Area (Table 2-3).

**Table 2-3: Properties in the BERD within the FFTOD Specific Plan Area**

| Primary Number (P-19-) | Historic Address | Construction Date / Time Period | Eligibility / NRHP Status Code |
|---|---|---|---|
| | 5833 MAKEE AVE | 1922 | Not eligible / 6U |
| | 6305 HOLMES AVE | - | Not eligible / 6U |
| | 6362 MAKEE AVE | 1905 | Not eligible / 6U |
| | 6608 MIRAMONTE BLVD | 1909 | Not eligible / 6U |
| 19-174467 | 6919 COMPTON AVE | - | Not eligible / 6Y |
| | 7000 COMPTON AVE | 1913 | Not eligible / 6U |
| | 4119 BELL AVE | 1928 | Not eligible / 6Y |
| | 1747 E FLORENCE AVE | 1933 | Not eligible / 6U |
| | 1583 E FLORENCE AVE | 1958 | Not eligible / 6Y |
| | 1600 E FLORENCE AVE | 1942 | Not eligible / 6Y |
| | 1560 E FLORENCE AVE | 1941 | Not eligible / 6Y |
| | 7313 COMPTON AVE | 1928 | Not eligible / 6U |
| | 1460 E 89TH ST | 1940 | Not eligible / 6Y |
| | 8908 MAIE AVE | 1974 | Not eligible / 6Y |
| 19-173460 | 1435 E 77TH PL | - | Not eligible / 6Y |
| 19-176488 | 1933 E 75TH ST | 1922 | Unevaluated |
| | 7700 WALNUT DR | 1921 | Not eligible / 6U |
| | 2056 E 76TH ST | 1914 | Not eligible / 6Y |
| | 7930 HOLMES AVE | 1923 | Not eligible / 6Y |
| 19-173498 | 8208 HOLMES AVE | - | Not eligible / 6Y |
| 19-174551 | 8227 WALNUT DR | 1923 | Not eligible / 6Y |
| 19-176487 | 8418 MIRAMONTE BLVD | 1923 | Unevaluated |
| 19-174476 | 1622 E 85TH ST | 1930 | Not eligible / 6Y |
| 19-176499 | 8708 FIR AVE | 1905 | Unevaluated |
| | 8908 MAIE AVE | 1974 | Not eligible / 6Y |
| 19-174380 | 9110 HOLMES AVE | 1910 | Not eligible / 6Y |
| 19-174573 | 1145 E 85TH ST | 1926 | Not eligible / 6Y |
| 19-175100 | 1120 E 81ST ST | 1939 | Not eligible / 6Y |
| 19-174533 | 1210 E 77TH PL | 1927 | Not eligible / 6Y |
| 19-174513 | 1234 E 73RD ST | 1926 | Not eligible / 6Y |
| 19-174637 | 1133 E 74TH ST | 1924 | Not eligible / 6Y |
| | 1130 E FLORENCE AVE | 1947 | Not eligible / 6Y |
| | 2118 E FLORENCE AVE | - | Not eligible / 6U |
| | 2122 E FLORENCE AVE | - | Not eligible / 6U |
| | 2126 E FLORENCE AVE | - | Not eligible / 6U |
| | 2134 E FLORENCE AVE | - | Not eligible / 6U |
| | 2136 E FLORENCE AVE | - | Not eligible / 6U |
| | 2140 E FLORENCE AVE | - | Not eligible / 6U |
| | 2200 E FLORENCE AVE | 1923 | Not eligible / 6U |

Notes:
6U = Determined ineligible for NRHP pursuant to Section 106 without review by Office of Historic Preservation (OHP).
6Y = Determined ineligible for NRHP by consensus through Section 106 process – Not evaluated for CRHR or local listing.

7R = Identified in Reconnaissance Level Survey or in an Area of Potential Effect (APE): Not evaluated.

## 2.3.3 California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical interest. A search of the California Historical Landmarks list revealed no California Historic Landmarks within the FFTOD Specific Plan Area.

## 2.3.4 Los Angeles Historic-Cultural Monuments

LAHCMs are sites in Los Angeles that have been designated by the Los Angeles Cultural Heritage Commission as worthy of preservation based on their architectural, historic, and cultural merits. A search of the LAHCMs revealed no LAHCMs within the FFTOD Specific Plan Area.

## 2.3.5 Supplemental Research

In addition to the reports reviewed at the SCCIC, an additional cultural resources study, the *Florence-Firestone Community Atlas* (AECOM 2020) is incorporated here; see also Appendix C. That report detailed the results of a desktop reconnaissance survey for cultural resources which examined portions of the FFTOD Specific Plan Area. The *Florence-Firestone Community Atlas* identified 98 individual properties of interest and one potential historic district (Table 2-4). These properties are described as over 45 years old; exhibiting a moderate to high degree of historic integrity of design, materials, and workmanship; and/or possessing historic significance related to the development of the community.

The *Florence-Firestone Community Atlas* identified residential properties along Miramonte Boulevard from Gage Avenue to Florence Avenue as a potential historic district with 92 contributing elements (not listed individually in Table 2-4). This corridor possesses single-family and multiple-family residential properties, largely constructed between 1900 and 1930 (with very little modern infill development) and defined by mature palm trees lining either side of the street. Many of these properties would not be eligible individually; however, as a unit they appear to be the most intact representation of folk Victorian, craftsman, and minimal-traditional-style residences in the area. The Miramonte Boulevard concentration of residential properties appears eligible for historic district designation as an example of a streetcar suburb retaining its character-defining features such as consistent setbacks, narrow lots, street landscaping, and streets laid out on a grid (AECOM 2020). As these properties have been previously identified as potential historical properties further evaluation is needed to determine the eligibility of these resources.

**Table 2-4: FFTOD Specific Plan Area Potential Historical Properties Identified through the *Florence-Firestone Community Atlas* that Require Further Evaluation**

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 5829 COMPTON AVE | Commercial | 1946 |
| 1426 E 58TH PL | Residential | 1926 |
| 1422 E 58TH PL | Residential | 1912 |
| 1405 E 58TH DR | Residential | 1948 |
| 1411 E 58TH DR | Residential | 1907 |
| 1433 E 58TH DR | Residential | 1913 |

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 1445 E 59TH ST | Residential | 1904 |
| 1330 E 59TH ST | Residential | 1907 |
| 1326 E 59TH ST | Residential | 1922 |
| 1301 E 59TH PL | Residential | 1949 |
| 1419 E 61ST ST | Residential | 1910 |
| 6200 HOOPER AVE | Residential | 1908 |
| 5869 MIRAMONTE BLVD | Residential | 1923 |
| 5911 MIRAMONTE BLVD | Residential | 1920 |
| 5908 MIRAMONTE BLVD | Residential | 1963 |
| 5912 MIRAMONTE BLVD | Residential | 1964 |
| 5903 CONVERSE AVE | Residential | 1923 |
| 5907 CONVERSE AVE | Residential | 1922 |
| 6000 MIRAMONTE BLVD | Residential | 1915 |
| 6014 MIRAMONTE BLVD | Residential | 1910 |
| 6019 CONVERSE AVE | Residential | 1921 |
| 6025 CONVERSE AVE | Residential | 1912 |
| 1700 E 58TH PL | Industrial | 1955 |
| 5930 JUNCTION ST | Residential | 1921 |
| 5933 JUNCTION ST | Residential | 1931 |
| 5931 JUNCTION ST | Residential | 1913 |
| 1822 E 61ST ST | Residential | 1907 |
| 6220 HOLMES AVE | Residential | 1912 |
| 1740 E GAGE AVE | Commercial | 1970 |
| 1853 E 65TH ST | Industrial | 1932 |
| 6500 HOLMES AVE | Institutional | 1962 |
| 1854 E 67TH ST | Industrial | 1936 |
| 1863 E FLORENCE AVE | Residential | 1921 |
| 1747 E FLORENCE AVE | Commercial | 1933 |
| 6525 COMPTON AVE* | Industrial | 1938 |
| 6901 COMPTON AVE | Residential | 1914 |
| 6516 MAKEE AVE | Residential | 1915 |
| 6602 MIRAMONTE BLVD | Residential | 1946 |
| 6601 MIRAMONTE BLVD | Residential | 1940 |
| 6726 COMPTON AVE | Residential | 1922 |
| 6900 COMPTON AVE | Institutional | 1951 |
| 6904 CONVERSE AVE | Residential | 1928 |
| 1655 E 71ST ST | Residential | 1912 |
| 1635 E FLORENCE AVE | Commercial | 1912 |
| 1633 E FLORENCE AVE | Commercial | 1928 |
| 1621 E FLORENCE AVE | Commercial | 1923 |
| 7000 COMPTON AVE | Residential | 1913 |

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 7008 COMPTON AVE | Commercial | 1921 |
| 7807 COMPTON AVE | Government | - |
| 7660 COMPTON AVE | Institutional | 1950 |
| 1500 E FLORENCE AVE | Commercial | 1928 |
| 1560 E FLORENCE AVE | Commercial | 1941 |
| 7220 MAIE AVE | Commercial | 1964 |
| 7322 MAIE AVE | Industrial | 1933 |
| 1318 E FLORENCE AVE | Commercial | 1933 |
| 2048 E FLORENCE AVE | Commercial | 1932 |
| 7201 S ALAMEDA ST | Commercial | 1948 |
| 8526 GRAPE ST | Government | - |
| 1839 FIRESTONE BLVD | Institutional | 1964 |
| 7901 COMPTON AVE* | Government | 1967 |
| 1721 E 68TH ST | Residential | 1923 |
| 1739 E 68TH ST | Residential | 1928 |
| 1745 E 68TH ST | Residential | 1913 |
| 6805 HOLMES AVE | Residential | 1924 |
| 1845 E 68TH ST | Residential | 1924 |
| 1842 E 69TH ST | Residential | 1913 |
| 1716 E 70TH ST | Residential | 1910 |
| 1863 E 71ST ST | Residential | 1929 |
| 7016 HOLMES AVE | Residential | 1922 |
| 1432 E 74TH ST | Residential | 1952 |
| 1442 E 77TH ST | Residential | 1896 |
| 1542 E 77TH PL | Residential | 1925 |
| 7675 WHITSETT AVE | Residential | 1922 |
| 7672 WHITSETT AVE | Residential | 1922 |
| 7211 BELL AVE | Government | - |
| 7684 WALNUT DR | Residential | 1924 |
| 1930 E 73RD ST | Residential | - |
| 2026 E 76TH ST | Residential | 1910 |
| 1540 E 80TH ST | Residential | 1960 |
| 8272 MIRAMONTE BLVD | Residential | 1910 |
| 1610 E 80TH ST | Residential | 1925 |
| 8218 MORTON AVE | Residential | 1920 |
| 1737 E 84TH ST | Residential | 1905 |
| 1785 E 85TH ST | Institutional | 1933 |
| 8511 HOLMES AVE | Institutional | 1928 |
| 2008 E 87TH ST | Institutional | 1929 |
| 8701 BANDERA ST | Residential | 1910 |
| 8716 ELM ST | Residential | 1913 |

| Resource | Use Type | Construction Date / Time Period |
|---|---|---|
| 1319 E 90TH ST | Residential | 1965 |
| 1423 E 90TH ST | Residential | 1955 |
| 8629 BANDERA ST* | Residential | 1921 |
| 1900 FIRESTONE BLVD* | Commercial | - |
| 1428 E 82ND ST* | Residential | 1947 |
| 1402 E 82ND ST* | Residential | 1947 |
| 1830 E FLORENCE AVE* | Commercial | 1981 |
| 7807 COMPTON AVE* | Government | c. 1974 |
| 7001 COMPTON AVE* | Commercial | 1946 |
| 7316 COMPTON AVE* | Commercial | 1961 |
| Miramonte Blvd Historic District (Multiple Addresses) | Residential | 1900-1930 |

Notes:
*Resource also identified in *A Paseo Through Time* in Florence-Firestone

Jeannene Przyblyski's book *A Paseo Through Time in Florence-Firestone* was also reviewed to identify cultural resources within the FFTOD Specific Plan Area. A total of 11 extant properties were identified within the FFTOD Specific Plan Area (Table 2-5). The other properties identified in *A Paseo Through Time in Florence-Firestone* are either outside of the FFTOD Specific Plan Area or are no longer extant. These properties have not been evaluated for national, state, or local register eligibility.

**Table 2-5: FFTOD Specific Plan Area Potential Historical Properties Identified through *A Paseo Through Time in Florence-Firestone* that Require Further Evaluation**

| Description | Address | Construction Date / Time Period |
|---|---|---|
| Former location of Graham Library | 8629 BANDERA ST | 1921 |
| Graham Library | 1900 FIRESTONE BLVD | - |
| William's Residence | 1428 E 82ND ST | 1947 |
| Carter Residence | 1402 E 82ND ST | 1947 |
| Former location of Fox Florence Theater | 1830 E FLORENCE AVE | 1981 |
| Florence-Firestone Community and Senior Center | 7807 COMPTON AVE | c. 1974 |
| Carlitos Tires/ "Steve's Place" | 7001 COMPTON AVE | 1946 |
| Superior Grocers | 7316 COMPTON AVE | 1961 |
| Gentry Theater | 6525 COMPTON AVE | 1938 |
| Firestone Sheriff Station/ Century Youth Activities League | 7901 COMPTON AVE | 1967 |
| Youth Activities League/ Former LA County Sheriff Station | 2201 E FIRESTONE BLVD | 1938 |

Source: Przyblyski 2017

### 2.3.5.1 Public Outreach

A total of 12 cultural resources were identified through public outreach efforts (Table 2-6; Appendix D). These properties have not been evaluated for national, state, or local register eligibility.

**Table 2-6: FFTOD Specific Plan Area Cultural Resource Properties Identified through Public Outreach Efforts**

| Description | Address | Construction Date / Time Period |
|---|---|---|
| Gentry Theater | 6525 COMPTON AVE | 1938 |
| Storybook House | 2181 FIRESTONE BLVD | 1939 |
| Graham Library | 1900 FIRESTONE BLVD | - |
| Graham Library (former location) | 1925 E. 87TH ST | 1938 |
| Graham Library (former location) | 8511 HOLMES AVE | |
| Firestone Sheriff Station/ Century Youth Activities League | 7901 COMPTON AVE | 1967 |
| Youth Activities League/ Former LA County Sheriff Station | 2201 E FIRESTONE BLVD | 1938 |
| Former location of Firestone Park Station; former locations of the Florence Library and Florence-Firestone Chamber of Commerce | 1557 E FLORENCE AVE | 1921 |
| Former location of Firestone Park Station; former locations of the Florence Library and Florence-Firestone Chamber of Commerce | 1555 E FLORENCE AVE | 1921 |
| Tessie Cleveland Community Services Corporation | 8019 COMPTON AVE | - |
| Youth Activities League | 7116 MAKEE AVE | c. 1977 |
| Miramonte Blvd. Palm trees | Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south) | c. 1900-1930 |

### 2.3.5.2 Consultation Process

In accordance with Senate Bill (SB) 18 and Assembly Bill (AB) 52, Los Angeles County contacted the Native American Heritage Commission (NAHC) and inquired about the presence/absence of sacred or religious sites in the vicinity of the FFTOD Specific Plan Area. The NAHC responded that there are no known sacred lands within the FFTOD Specific Plan Area or a 0.5-mile radius and provided a list of AB 52-specific Native American tribes with traditional lands or cultural places within the boundaries of the FFTOD Specific Plan Area. These tribes include Soboba Band of Luiseno Indians, Gabrieleno Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Gabrieleno/Tongva Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrieleno Band of Mission Indians-Kizh Nation, Santa Rosa Band of Cahuilla Indians, and two contacts for the Fernandeno Tataviam Band of Mission Indians. On March 11, 2021, in compliance with CEQA and SB 18, Los Angeles County sent letters to the nine Native American contacts notifying them of the project and requesting comments or concerns for the FFTOD Specific Plan Area.

# 3.0 REGULATORY SETTING

Federal, state, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Historic Preservation Act (NHPA) and CEQA are the primary federal and state laws governing preservation of historic and archaeological resources of national, regional, state and local significance.

## 3.1 FEDERAL

### 3.1.1 National Historic Preservation Act

The NHPA (16 United States Code [USC] 470) and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) establish a program for the preservation of historic properties throughout the U.S. and provides a framework for identifying and treating historical and archaeological resources under CEQA. Section 106 of the NHPA requires that federal projects or projects under federal jurisdiction consider the effect of an undertaking on properties eligible for or included in the National Register of Historic Places (NRHP). Historic properties that are listed in or eligible for the NRHP are considered historical resources for the purposes of CEQA.

NHPA establishes the NRHP, which is "an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR Part 60.2). To be eligible for listing in the NRHP, a property must be at least 50 years old (or have reached 50 years old by the project completion date) and possess significance in American history and culture, architecture, or archaeology to meet one or more of four established criteria (36 CFR Part 60.4):

A. Association with events that have made a significant contribution to the broad patterns of our history;
B. Association with the lives of persons significant in our past;
C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and/or
D. Have yielded, or may be likely to yield, information important in prehistory or history.

Historic resources eligible for listing in the NRHP are considered "historic properties" and may include buildings, sites, structures, objects, and historic districts. A potential historic property less than 50 years old may be eligible under NRHP Criteria Consideration G if it can be demonstrated that sufficient time has passed to understand its historic importance (National Register Bulletin 15, page 43). To be eligible for listing in the NRHP, a property must also have integrity, which is defined as "the ability of a property to convey its significance." Under the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity: feeling, association, workmanship, location, design, setting, and materials (National Register Bulletin 15, pages 44–45).

The implementing regulations include a provision for early and effective communication with interested parties, such as Native American tribes. Under this provision (36 CFR Part 800.2[A]), the lead agency is responsible for contacting local Native American representatives and informing them of the project's intent and nature. The Native American representative is then provided "a reasonable opportunity to identify its concerns about historic properties; advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance; articulate its views on the undertaking's effects on such properties; and participate in the resolution of adverse effects."

## 3.1.2 Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites that are on federal and Native American lands.

## 3.1.3 Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants and culturally affiliated Native American tribes.

## 3.1.4 State

California implements the NHPA through comprehensive cultural resources surveys and preservation programs. The California Office of Historic Preservation (OHP) implements the policies of the NHPA and maintains the California Historical Resources Inventory.

### 3.1.4.1 California Environmental Quality Act

Under CEQA (Public Resources Code [PRC] Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. *State CEQA Guidelines* Section 15064.5 defines a historical resource as: 1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR; 2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and 3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or Section 5024.1.

As described by PRC Section 21084.1 and Section 15064.5 of the *State CEQA Guidelines*, should a project cause a substantial adverse change (defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired) in the significance of an historical resource,

the lead agency must identify potentially feasible measures to mitigate these effects (*State CEQA Guidelines* Sections 15064.5[b][1] and 15064.5 [b][4]).

Archaeological resources are defined in CEQA Section 21083.2, which states that a "unique" archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Unique archaeological resources as defined in Section 21083.2 may require reasonable efforts to preserve resources in place (Section 21083.1[a]). If preservation in place is not feasible, mitigation measures will be required. In addition, the *State CEQA Guidelines* specify that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources will not be considered a significant effect on the environment (*State CEQA Guidelines* Section 15064.5[c][4]

### 3.1.4.2 California Register of Historical Resources

The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing historical resources within the state and to indicate which of those resources should be protected—to the extent prudent and feasible—from substantial adverse change. The CRHR consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. Properties eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data (California Code of Regulations Section 4852 [c]) To be eligible for listing in the CRHR, a property must be at least 45 years of age and possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Potential historical resources eligible for listing in the CRHR may include buildings, sites, structures, objects, and historic districts. A resource less than 45 years old may be eligible if it can be demonstrated that sufficient time has passed to understand its historic importance. While the enabling legislation for the CRHR is less rigorous with regard to the issue of integrity, there is an expectation that properties reflect their appearance during their period of significance (PRC Section 4852).

### 3.1.4.3 California Points of Historical Interest

California Points of Historical Interest (PHIs) are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. PHIs designated after December 1997 and recommended by the SHRC are also listed in the CRHR. No historic resource may be designated as both a landmark and a point. If a point is later granted status as a landmark, the point designation will be retired. In practice, the point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance. To be eligible for designation as a PHI, a resource must meet at least one of the following criteria:

- It is the first, last, only, or most significant of its type within the local geographic region (city or county);
- It is associated with an individual or group having a profound influence on the history of the local area; or
- It is a prototype of—or an outstanding example of—a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

### 3.1.4.4 California Public Resources Code

Archaeological and historical sites are protected pursuant to policies and regulations enumerated under the California PRC. California PRC Sections 5020–5029.5 continue the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. California PRC Sections 5079–5079.65 define the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federally and State-mandated historic preservation programs in California and the California Heritage Fund. California PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods. California PRC Section 21083.2(g) protects archaeological resources. California PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

### 3.1.4.5 California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code Section 7050.5, which states that:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation… until the coroner… has determined… that the remains are not subject to… provisions of law concerning investigation of the circumstances, manner and cause of any death, and

> the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible… The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and… has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

#### 3.1.4.6 California Senate Bill 18

Existing law provides limited protection for Native American prehistoric, archaeological, cultural, spiritual, and ceremonial places. These places may include sanctified cemeteries, religious and ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological or historic sites, Native American rock art inscriptions, or features of Native American historic, cultural, and sacred sites.

SB 18, which focuses on traditional tribal cultural places was signed into law in September 2004 and went into effect on March 1, 2005. It placed new requirements on local governments for the adoption, revision, amendment, or update of a city's or county's general plan within or near traditional tribal cultural places (TTCP). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, the Final Tribal Guidelines advise that SB 18 requirements extend to specific plans as well, because state planning law requires local governments to use the same process for amendment or adoption of specific plans as general plans (defined in Government Code Section 65453).

SB 18 requires local jurisdictions to provide opportunities for involvement of California Native Americans tribes in the land planning process for the purpose of preserving traditional tribal cultural places. The Final Tribal Guidelines recommend that the NAHC provide written information as soon as possible—but no later than 30 days—after receiving notice of the project to inform the lead agency if the proposed project is determined to be in proximity to a TTCP, and another 90 days for tribes to respond to a local government if they want to consult with the local government to determine whether the project would have an adverse impact on the TTCP. There is no statutory limit on the consultation duration. Forty-five days before the action is publicly considered by the local government council, the local government refers action to agencies, following the CEQA public review time frame. The CEQA public distribution list may include tribes listed by the NAHC who have requested consultation or it may not. If the NAHC, the tribe, and interested parties agree on the mitigation measures necessary for the proposed project, it would be included in the project's EIR. If both Los Angeles County and the tribe agree that adequate mitigation or preservation measures cannot be taken, then neither party is obligated to take action.

In addition, SB 18 provided a new definition of TTCP requiring a traditional association of the site with Native American traditional beliefs, cultural practices, or ceremonies, or the site must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. Previously, the site was defined to require only an association with traditional beliefs, practices, lifeways, and ceremonial activities. In addition, SB 18 law also amended Civil Code Section 815.3 and added California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

#### 3.1.4.7 Assembly Bill 52

Effective July 1, 2015, AB 52 requires inclusion of a new section in CEQA documents titled Tribal Cultural Resources, for projects where the Notice of Preparation or Notice to adopt a Negative Declaration or Mitigated Negative Declaration is filed after this date. Similar to SB 18, AB 52 requires consultation with tribes at an early stage (within 14 days of a lead agency deeming an application complete or deciding to undertake a project) to determine whether the project would have an adverse impact on tribal cultural resources and provide mitigation to protect them.

### 3.1.5 Local

#### 3.1.5.1 Los Angeles County

The Historic Preservation Ordinance establishes a local register and a Historical Landmarks and Records Commission to oversee the enforcement of preservation policies that relate to planning, demolition, alteration, and new construction. Actions to resources that are locally registered or eligible for registration are reviewed by the Historical Landmarks and Records Commission for appropriateness.

# 4.0 METHODOLOGY

According to the State CEQA Guidelines (Section 15064.5[b]), a project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment. The Guidelines further state that a substantial adverse change in the significance of a resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired. Actions that would materially impair the significance of a historical resource are any actions that would demolish or adversely alter those physical characteristics of a historical resource that convey its historical significance and qualify it for inclusion in the California Register or in a local register or survey that meet the requirements of PRC Section 5020.1(k) and Section 5024.1(g). A lead agency must also take into account impacts to unique archaeological resources (State CEQA Guidelines Section 15064.5[c][1]-[4]). A project that may disrupt or adversely affect paleontological resources is a project that may have a significant effect on the environment.

## 4.1 THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the project would have a significant impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of dedicated cemeteries.

Additionally, the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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:

- Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); or
- 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

# 5.0 ENVIRONMENTAL IMPACTS

**CUL-1:** *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?*

As previously described, FFTOD Specific Plan Area has a variety of historical resources and cultural resources that require further evaluation. Five previously recorded historical resources have been identified within the FFTOD Specific Plan Area. These resources include the NRHP

eligible Miramonte Elementary School (P-19-176186); the Union Pacific Railroad (P-19-186110); the Mojave Road, which is a California Registered Historical Landmark # 963; the Boulder Dam – Los Angeles 287.5kV Transmission Line (P-19-188983); and the Paul R. Williams/ Parkside Manor Historic District (P-19-190949).

The FFTOD Specific Plan would establish transit oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three Metro A (Blue) Line Stations in the community (i.e., Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a TOD development pattern, which could impact existing historical resources within the FFTOD Specific Plan Area and its surroundings.

The FFTOD Specific Plan does not identify any specific development projects; therefore, it would not directly demolish or materially alter historical resources. However, identified historic structures and sites that are eligible or potentially eligible for NRHP listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

In addition to the historic resources identified in this technical report, there are numerous other residential and commercial buildings within the FFTOD Specific Plan Area that are older than 50 years. As these structures have not been comprehensively surveyed and evaluated, it is possible that they may be eligible as historic resources if other criteria apply, such as significant associations with important events, people, or have high architectural merit. Therefore, future development projects pursuant to implementation of the FFTOD Specific Plan could adversely affect other historical resources not identified in this . The impact to a historical resource is considered significant. Overall, the FFTOD Specific Plan would not immediately impact any potentially historical resources provided in Table 2-4, Table 2-5, and Table 2-6. However, future development projects pursuant to implementation of the FFTOD Specific Plan that involve these properties would require a formal assessment of the resources.

**CUL-2:** *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?*

Future development projects pursuant to implementation of the FFTOD Specific Plan could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The FFTOD Specific Plan Area is considered potentially sensitive for archaeological resources. Therefore, ground disturbance is considered to have a high potential for uncovering archaeological resources.

**CUL-3:** *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Ground disturbance from future development projects pursuant to implementation of the FFTOD Specific Plan could damage fossils buried in soils. Abundant fossils occur in the older Quaternary alluvial deposits in the FFTOD Specific Plan Area. These deposits have produced numerous important fossil specimens. Therefore, the FFTOD Specific Plan Area contains significant, nonrenewable, paleontological resources that are considered to have high sensitivity.

**CUL-4:** *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

There are thousands of archaeological sites within LA County and human habitation in LA County is known to date to at least approximately 7,000 years B.C. Therefore, human remains could be buried in soils. The FFTOD Specific Plan Area is developed and has previously been subjected to substantial ground disturbance, which likely already resulted in the discovery of subsurface materials such as human remains. Nevertheless, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. Human burials have specific provisions for treatment in Section 5097 of the California PRC, which authorizes the Native American Heritage Commission to resolve any disputes related to the disposition of Native American burials. PRC Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have provisions protecting human burial remains from disturbance, vandalism, or destruction. California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to their authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the Native American Heritage Commission by phone within 24 hours. Therefore, compliance with these regulations would ensure impacts to discovery of human remains are less than significant.

**TCR-1:** *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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 listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)?*

**TCR-2:** *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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 PRC Section 5024.1?*

Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. The FFTOD Specific Plan would establish transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. While the project itself does not propose any new development, it would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three LA Metro A (Blue) Line Stations in the community (i.e., Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a TOD development pattern, which could impact existing historical resources within the FFTOD Specific Plan Area and its surroundings.

As described in Section 3.3, Cultural Resources, the FFTOD Specific Plan does not identify any specific development projects; therefore, it would not directly demolish or materially alter historical resources. However, identified historic structures and sites that are eligible or potentially eligible for NRHP listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources to the extent that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

Note that the five previously recorded historical resources identified within the FFTOD Specific Plan Area (Miramonte Elementary School; the Union Pacific Railroad; the Mojave Road; the Boulder Dam – Los Angeles 287.5kV Transmission Line; and the Paul R. Williams/ Parkside Manor Historic District), are all twentieth century creations/developments and therefore do not figure into the ethnographic and ethnohistoric literature related to the Gabrieleno. However, as detailed above, the FFTOD Specific Plan Area is within the territory inhabited by Native Americans (Gabrieleno/Tongva) and may have sensitive tribal cultural resources.

Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review; identify and address potential adverse impacts to tribal cultural resources; and reduce the potential for delay and conflict in the environmental review process. In accordance with AB 52 and SB 18 requirements, Los Angeles County sent invitation letters to representatives of the nine Native American contacts provided by the NAHC on March 11, 2021, formally inviting tribes to consult with Los Angeles County on the project. The intent of the consultations is to provide an opportunity for interested Native American contacts to work with Los Angeles County during the project planning process to identify and protect tribal cultural resources. Los Angeles County received two responses via email: one response from the Fernandeno Tatavium Band of Mission Indians (FTBMI) noted that the FFTOD Specific Plan Area is outside the FTBMI ancestral Tribal boundaries and deferred consultation for the Project to members of the Gabrieleno Indian Tribe; the other response, from

the Gabrieleno Band of Mission Indians – Kizh Nation, declined to consult at the time because no immediate ground disturbance would be taking place; however the tribal contact requested to be notified regarding ground disturbance of future development projects. No other tribes responded to Los Angeles County's notification letter.

There are no known tribal cultural resources in the FFTOD Specific Plan Area, but ground-disturbing activities have the potential to cause a substantial adverse change in the significance of tribal cultural resources of a California Native American tribe. Each future development project in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes (which would include follow up with the Gabrieleno Band of Mission Indians – Kizh Nation) (see Mitigation Measure CUL-2 in Section 3.3, Cultural Resources). Where significant impacts to tribal cultural resources are identified, future development projects would be required to either avoid impacts or implement feasible mitigation measures to reduce impacts.

In addition, as described in Section 3.3, Cultural Resources, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. Human burials have specific provisions for treatment in Section 5097 of the PRC, which authorizes the NAHC to resolve any disputes related to the disposition of Native American burials. PRC Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also has provisions protecting human burial remains from disturbance, vandalism, or destruction. California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation or to their authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the NAHC via phone within 24 hours.

# 6.0 MITIGATION MEASURES

The potential to impact historical resources would be mitigated to the greatest extent practicable by implementing the following mitigation measure:

**MM CUL-1** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involves ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to LA County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

The potential to impact archaeological resources would be mitigated to the greatest extent feasible by implementing the following mitigation measure:

**MM CUL-2** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Future development projects or other ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to LA County's approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, LA County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

During future development project-level construction, should prehistoric or historic subsurface cultural resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with LA County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is

demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with LA County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

The potential to impact paleontological resources would be mitigated to the greatest extent practicable by implementing the following mitigation measure:

**MM CUL-3** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to LA County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by LA County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and LA County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and LA County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by LA County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by LA County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

# 7.0 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measure CUL-1 has been incorporated into the project to protect historic resources. However, the provisions of CUL-1 afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. In addition, some structures that are not currently considered for historic value (because generally, they must be at least 50 years old) could become worthy of consideration during the planning period for the project (i.e., during the horizon year of 2035). While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact.

CUL-2 and CUL-3 would reduce potential impacts associated with archaeological and paleontological resources to a less-than-significant level.

CUL-1 through CUL-3 would reduce potential impacts associated with tribal cultural resources to a level that is less than significant.

# 8.0 CUMULATIVE IMPACTS

Under CUL-1, the project could still contribute to significant cumulative impacts to historic resources. Therefore, the project's contribution would still be significant.

The implementation of Mitigation Measures CUL-2 and CUL-3 would ensure that the project's contribution to cumulative impacts on archaeological resources and paleontological resources would be reduced to less than cumulatively considerable by avoiding an adverse impact or an adverse change in the significance.

Future development projects in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes. Programmatic mitigation measures CUL-1 through CUL-3 would reduce potentially significant impacts of the project related to tribal cultural resources to a level that is less than significant with mitigation incorporated. Other cumulative developments within the region would similarly be required to mitigate any impacts to historic and tribal cultural resources to a level that is less than significant, as well as consult with tribal representatives as required by AB 52; such impacts are not cumulatively considerable.

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# APPENDICES

# APPENDIX A: PREPARER QUALIFICATIONS

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# **Marc Beherec,** PhD, RPA

Archaeologist

**Education**

PhD, Anthropology, University of California, San Diego, La Jolla, CA, 2011

MA, Anthropology, University of California, San Diego, La Jolla, CA, 2004

BA, Anthropology, University of Texas, Austin 2000

**Licenses/Registrations**

Certified Archaeologist, County of Orange

Registered Professional Archaeologist #989598

AECOM Certified Project Manager (PM)

**Years of Experience**

With AECOM: 8

With Other Firms:12

**Professional Associations**

Society for American Archaeology

Society for California Archaeology

Dr. Marc Beherec is an archaeologist who has been involved in the field of cultural resources management for approximately twenty years. He has worked throughout California, Texas, and the Midwest on projects within Federal and State regulatory framework, and has written cultural resources assessments for several agency clients, satisfying the requirements of both the California Environmental Quality Act and Section 106 of the National Historic Preservation Act. He is experienced in the identification and analysis of both prehistoric and historic era artifacts, including Chinese Overseas pottery. Dr. Beherec also has extensive experience in Paleoindian and Archaic period sites in the western US, has led excavations at significant prehistoric and historic sites in California including within El Pueblo Historic Monument, and has taken part in large-scale excavations in Jordan. In addition, Dr. Beherec has assisted in tribal consultation and coordinated tribal cultural resources monitoring with tribes active in the Orange, Los Angeles, and Riverside County areas. Dr. Beherec served as Lead Monitor for the NextEra Genesis Solar Energy Project near Blythe and as Project Manager and Project Archaeologist for the Los Angeles Metropolitan Transportation Authority's large Regional Connector and Crenshaw rail projects. He is a Certified Archaeologist in the County of Orange and has prepared CEQA cultural resources impact studies and led archaeological and paleontological monitoring projects for the County of Orange. He manages a team of full-time archaeologists and numerous project-specific part-time employees and subcontractors conducting work in Orange County, the Greater Los Angeles area, and elsewhere in Southern California.

**Selected Project Experience**

**Los Angeles Metropolitan Transportation Authority Zanja Discovery Program, Los Angeles, CA.** Conducted archival research and assembled historical data to determine the location and construction history of the Los Angeles Zanja System, the city's irrigation system first constructed during the Spanish period and in continuous use and expansion into the twentieth century. Included research within city archives and published records to determine the probable locations of underground portions of this miles-long system, which Metro treated as an eligible resource for the National Register of Historic Places. Information was used to guide cultural resources compliance during construction of the Regional Connector subway corridor.

**Los Angeles Bureau of Engineering El Pueblo Temporary Homeless Shelter Monitoring, El Pueblo Historical Monument, Los Angeles, CA.** Oversaw archaeological compliance monitoring for the project, located in a parking lot near the Los Angeles Plaza Historic District and the city's old Chinatown. Chinese Overseas pottery was included in inadvertent finds for the project, which uncovered a previously undocumented segment of CA-LAN-007, a multicomponent archaeological site. Tasks included coordinating and overseeing monitoring, evaluating finds for inclusion in the CRHR, recovering unanticipated finds, conducting archival research, analysing and curating finds, and completing an updated DPR form for CA-LAN-007 and final report. The project resulted in the publication of a paper in the *Proceedings of the Society for California Archaeology* vol. 33.

**Los Angeles Bureau of Engineering El Pueblo Historic Monument Restroom Renovation Project, El Pueblo Historical Monument, Los Angeles, CA.** Oversaw archaeological compliance monitoring for the project, located within a building within the Los Angeles Plaza Historic District. The project uncovered a previously undocumented segment of CA-LAN-3549, an American period

archaeological site associated with the winery and associated brothels. Tasks included coordinating and overseeing monitoring, evaluating finds for inclusion in the CRHR, recovering unanticipated finds, conducting archival research, analysing and curating finds, and completing an updated DPR form for CA-LAN-3549 and final report.

**Los Angeles Department of Water and Power City Trunk Line Replacement Project, Los Angeles, CA.** Completed a Phase I cultural resources analysis of the City Trunk Line Project, located in the vicinity of San Fernando Mission. Tasks included archival research to identify potential unrecorded archaeological features in the vicinity of the mission; researching known sites at the South Central Coastal Information Center at California State University, Fullerton; conducting archaeological and built environment surveys; assessing finds for inclusion on the California Register of Historic Places; writing reports of findings.

**Brea Canyon Road Widening Project EIR, Orange County, CA.** Dr. Beherec prepared the cultural resources study in support of the EIR. Work was located in the vicinity of a monument placed by the Native Daughters of the Golden West to the Portola expedition, which persistent local belief stated camped within the project area. Dr. Beherec conducted archival research which identified that Portola did not camp in the area, but inadvertent Native American and Mexican period archaeological finds in the 1930s led to the local legend. Tasks included research at the CHRIS archives, ethnographic and local history research, tribal and interested party outreach, built environment and archaeological resources surveys, evaluation of finds for inclusion in the CRHR, recommendation of treatment of eligible resources, and preparation of DPR forms and a final report.

**Orange County Public Works, Santa Ana River Parkway Extension Project EIR, Orange County, CA.** Dr. Beherec prepared the cultural resources study in support of the EIR. Dr. Beherec conducted research at the California Historical Resources Information System (CHRIS) archives including the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton; conducted ethnographic and local history research; conducted Native American Heritage Commission and tribal outreach: directed a cultural resources survey; and contributed to the final report. Dr. Beherec also conducted an additional survey and prepared an additional memorandum in support of the Section 408 permit.

**California State University, Long Beach Hillside Housing Project Extended Phase I Archaeological Study and Cultural Resources Monitoring and Discovery Plan, Long Beach, CA.** Dr. Beherec prepared the extended phase I archaeological resources impact report and monitoring and discovery plan in support of an EIR. The project is sensitive because work overlapped the mapped site boundary of CA-LAN-235, a contributing archaeological site to the Puvunga Indian Village Historic District, which is an NRHP-listed historic district that is also a tribal cultural resource and includes an active ceremonial site. Dr. Beherec conducted CHRIS archival research and assisted in tribal and State Historic Preservation Office (SHPO) consultation. Dr. Beherec conducted archaeological testing to determine the archaeological site boundaries and, with the input of tribal leaders and SHPO, prepared a plan for monitoring and discovery.

**Upper Newport Bay East Bluff Drainage Improvement Project, Newport Beach, CA.** Dr. Beherec coordinated archaeological and paleontological monitoring for the project, and also interacted with the designated tribal monitors. Work was conducted within the boundary of a known archaeological site and within known fossiliferous deposits. Dr. Beherec identified and scheduled qualified monitors, conducted sediment sampling, took charge of fossils and provided them to the project paleontologist for analysis.

**Los Angeles Metropolitan Transportation Authority Compliance Monitoring**
Dr. Beherec served as Project Archaeologist and Project Manager for the cultural resources compliance monitoring of multiple multi-year projects within the greater Los Angeles area, including the 8.5-mile Crenshaw rail transit corridor and associated stations and the 1.9-mile Regional Connector subway corridor and associated stations. Tasks involve instructing construction team in cultural resources compliance; the scheduling and coordination of multiple concurrent Native American and archaeological monitors on diverse construction efforts throughout the metropolitan area; testing and evaluating finds; compilation, QA/QC, and delivery of daily monitoring logs and other documentation for all on-site monitors; serving as a liaison between archaeological monitors, construction crew, and client project team; preparing weekly and monthly reports of activities and findings; and ensuring overall cultural resources compliance within the permitted conditions of the project.

**County of Los Angeles Department of Public Works**
**Topanga Underground Utilities District Archaeological Mitigation**
Field director of archaeological mitigation at CA-LAN-8, a prehistoric site in the Santa Monica Mountains. Oversaw a team of 8 in hand-excavation and sieving of mechanically excavated soils. Tasks include coordinating archaeologists and Native American monitors; compilation and QA/QC of field documents; serving as a liason between the Native American monitor, the Most Likely Descendant, and other Native American groups, construction crew, and client representatives; and preparing reports of findings.

# Trina Meiser
## Senior Architectural Historian/Preservation Planner

**Professional History**
03/2008 – present, AECOM
11/2007 – 03/2008, RHA, Architects
02/2006 – 11/2007, Dewberry-Goodkind
05/2003 – 02/2006, Historic Ithaca, Inc.
05/1999 – 08/2001, RHA, Architects

**Education**
MA, Historic Preservation Planning, Cornell University, 2003
BA, History, Kenyon College, 1998

**Years of Experience**
With AECOM: 12
With Other Firms: 7

**Areas of Expertise**
CEQA Compliance
Section 106 Compliance
APE Delineation
NRHP Eligibility Evaluations
CRHR Eligibility Evaluations
PRC Sec. 5024
Intensive Archival Research
Cultural Resources Studies
NRHP Nominations
HABS/HAER/HALS Documentation

Trina Meiser is an architectural historian and a historic preservation planner who meets the Secretary of the Interior's qualifications (36 CFR Part 61; 48 Fed. Reg. 44738) in architectural history and history. Ms. Meiser has 20 years of experience in identifying, evaluating, and planning for cultural and architectural resources, including a wide variety of historic buildings, structures, districts, and landscapes. She specializes in technical analysis based on archival research and survey to support regulatory compliance, specifically under the California Environmental Quality Act (CEQA), PRC Section 5024, Section 106 of the National Historic Preservation Act (NHPA), and the National Environmental Policy Act (NEPA). She conducts cultural resources studies, including inventory, survey, and evaluation reports; technical reports for CEQA compliance in support of Environmental Impact Reports (EIRs); California Register of Historical Resources and California Historical Landmarks evaluations; impacts analyses, Section 4f assessments, and findings of effect; National Register of Historic Places (NRHP) nominations; and HABS/HAER/HALS documents. She consults on transportation, energy, military, civic, and other community projects with designers, developers, and agencies, including the California State Historic Preservation Officer (SHPO). Her experience in historic preservation provides a strong understanding of federal, state, and local regulations and a thorough knowledge of the Secretary of the Interior's Standards for the Treatment of Historic Properties and their function in adaptive use, architectural design, and historic preservation planning.

**Relevant Experience**

**University of California San Diego, Long Range Development Plan Programmatic EIR, San Diego, CA** Prepared historical resources discipline section for the UCSD LRDP EIR, including review of historical resources technical study. Reviewed methodology, application of context themes for eligibility determinations, recommendations for future identification efforts, and preliminary impacts assessments. The UCSD LRDP EIR encompasses the historic districts and individually eligible modernist buildings and landscapes. Through the EIR process, responded to comments and concerns of interested parties and the public.

**City of San Marcos General Plan Update, San Marcos, CA**
As lead historic preservation specialist, prepared the cultural resources section as part of the comprehensive update of the San Marcos General Plan. Assisted with the preparation of land use alternatives that preserve the City's character while allowing new pedestrian-friendly, mixed-use development in key focus areas of the City, and analyzed potential impacts to historic resources.

**Los Angeles County Metropolitan Transportation Authority (LACMTA), Regional Connector Cultural Resources Mitigation Management Plan; HAER and HABS, Los Angeles, CA** As lead architectural historian, prepared mitigation management plan to fulfill requirements set forth in an MOA and EIS/EIR in compliance with CEQA and Section 106 for the project to connect two light-rail transit lines in downtown Los Angeles. Researched and prepared HABS CA-2907 documentation of the Atomic Café in Little Tokyo; contributed to the Zanja No. 3 HAER. Coordinated consultation with the LA Conservancy and the Little Tokyo Association.

**LACTMA, South Bay Metro Green Line Extension Project, Los Angeles County, CA** As lead architectural historian, created survey and evaluation strategy in consultation with the SHPO and conducted cultural resources technical studies for transportation project through metropolitan LA to meet Section 106 requirements. Prepared technical report and the cultural resources portion of the EIS/EIR in compliance with NEPA and CEQA, including mitigation measures for the treatment of evaluated historical resources.

**LACMTA, Purple Line Extension 3/ Westside Subway Extension, Los Angeles, CA** Reviewed potential design changes to the Westwood/UCLA entrance at the Linde Medical Building (Chase Bank), 10921 Wilshire Boulevard, to identify potential issues under Section 106 of the NHPA, NEPA, and CEQA that could result from unanticipated adverse effects on a historic property. Recommended steps to identify character-defining features and avoid adverse effects by adhering to the SOI Standards.

**LACMTA, Metro Operations and Control Center Phase I Evaluation, Los Angeles, CA** Conducted an intensive built environment survey to identify historical resources within an APE; reviewed existing documentation of potential historical resources in the survey area; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA.

**Expo Authority, Exposition Corridor Transit Project Phase 2, Los Angeles, CA** As lead architectural historian, prepared technical report for the evaluation of historical resources and the cultural resources portion of environmental impact statement/report under NEPA and CEQA. Elements for Section 106 consultation included the requesting concurrence on determinations of eligibility and mitigation measures for the treatment of historic properties.

**Los Angeles Bureau of Engineering (LABOE), Rancho Cienega Sports Complex Project, Los Angeles, CA** As lead architectural historian, conducted an intensive built environment; reviewed existing documentation; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA. As part of the technical study, identified the Celes King III Pool as a historical resource for its architectural significance; recommended mitigation measures as part of a specific EIR for its demolition.

**LABOE, Pio Pico Pocket Park Project, Los Angeles, CA** As lead architectural historian, oversaw an intensive built environment survey to identify historical resources within an APE; reviewed existing documentation

of potential historical resources in the survey area; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA.

**LABOE, Lafayette Park Temporary Housing Project, Los Angeles, CA** As lead architectural historian, oversaw an intensive built environment survey to identify historical resources within an APE; reviewed existing documentation of potential historical resources in the survey area; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA.

**LABOE, Vermont Avenue Temporary Housing Project, Los Angeles, CA** As lead architectural historian, oversaw an intensive built environment survey to identify historical resources within an APE; reviewed existing documentation of potential historical resources in the survey area; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA.

**Port of Los Angeles, Harbor Performance Enhancement Project, San Pedro, CA** As lead architectural historian, oversaw an intensive built environment survey to identify historical resources within an APE; reviewed existing documentation of potential historical resources in the survey area; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA.

**Los Angeles Department of Water and Power (LADWP), Elysian Park Water Recycling Project, Los Angeles, CA** As lead architectural historian, oversaw an intensive built environment survey to identify historical resources within an APE; reviewed existing documentation of potential historical resources in the survey area; evaluated resources for eligibility to the CRHR; and prepared technical study to support environmental review in compliance with CEQA.

**Water Replenishment District of Southern California (WRD), Groundwater Reliability Improvement Program (GRIP) Recycled Water Project, Pico Rivera, Los Angeles County, CA** As lead architectural historian, conducted research, survey, and evaluation of historic architectural resources in support of environmental review of this linear project. Prepared technical study and supplemental studies related to project changes.

**US Coast Guard, Los Angeles Harbor Light Station Rehabilitation, San Pedro, California.** Evaluated potential adverse effects to NRHP-listed Angel's Gate lighthouse resulting from project to rehabilitate the defunct 100-year old structure. Conducted historical research to determine historically significant and character-defining features. As consultant to US Coast Guard, prepared finding of No Adverse Effect for Section 106 consultation for SHPO concurrence.

# Monica Wilson
# Architectural Historian

**Professional History**

07/2015 - Present, AECOM Planner

**Education**

MA, Public History, California State University, Sacramento, 2015
BA, American History, California State University, Sacramento, 2012

**Years of Experience**

With AECOM: 5

**Professional Affiliations**

National Council on Public History

**Professional History**

July 2015– Present
Environment West Region at AECOM
Architectural Historian
2013–June 2015
California State Parks, Photographic Archives
Graduate Student Assistant
2012-2014
California Department of Water Resources
Digital Collections Analyst

Monica Wilson meets the Secretary of the Interior Professional Qualification Standards for work in history and architectural history and has a Master degree in Public History. She has more than 7 years of experience in the fields of cultural resource management, cultural heritage preservation, and archival research. She has served on a variety of projects throughout the United States. At AECOM, Ms. Wilson has contributed to and authored technical reports for a variety of property types such as historical theaters, lighthouses, aircraft hangers, hotels, prisons, wharfs, train stations, commercial buildings, industrial buildings and complexes, neighborhoods, moved historical properties, ranches and rural properties. Her experience also includes architectural survey, historic research and context development, California Environmental Quality Act (CEQA) and Section 106 compliance, Historic Resource Evaluation reports, National Register nominations, traditional cultural properties, and oral history. Ms. Wilson has completed inventory and evaluation of historic-age resources for National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and relevant local ordinance eligibility.

**Experience**

**Los Angeles Department of Water and Power. Cultural Resources Assessment for Silver Lake Stormwater Capture Project, Los Angeles, California.**
Co-lead author for a technical memorandum documenting the potential impact to cultural and tribal cultural resources associated with the Silver Lake Reservoir Stormwater Capture Project, including impacts assessment and recommendations for the Silver Lake Reservoir Complex Historic District.

**Los Angeles County Transportation Authority (Metro). Supplemental Environmental Impact Report for the Metro Gold Line Foothill Extension, Los Angeles, California.**
Assisted with cultural resources analysis for the Metro Gold Line Foothill Extension project modification areas. Prepared information and impact analysis for Cultural Resources chapter.

**Judicial Council of California, Statewide CEQA Services, Historical Resources, San Diego and Pomona, California.**
Conducted fieldwork to record and evaluate the 1954 Modern-style Kearny Mesa Juvenile Detention Facility and the 1958 International-style Pomona Courthouse North building. Prepared Historic Technical Reports for the evaluation of historical resources eligibility to federal, state, and local registers, in compliance with CEQA and Section 106.

**Los Angeles Bureau of Engineering (LABOE). Cultural Resources Assessment for the Lincoln Heights Jail, Los Angeles, California.**
Conducted fieldwork to record and evaluate the Lincoln Heights Jail, a 1931 Art Deco-style building with a 1949 Modern-style addition. Prepared the Cultural Resources Assessment report for the evaluation of historical resources eligibility to federal, state, and local registers, in compliance with CEQA and Section 106.

**California Department of Transportation (Caltrans), Los Angeles Department of Transportation (LADOT), and LABOE. Western Avenue Bus Stop and Pedestrian Improvement Project, Los Angeles, California.**
Co-lead author that created historic context and documented present conditions and architectural descriptions for the technical reports. Project involves pedestrian improvements near two Los Angeles Historic Preservation Overlay Zones. Conducted archival research, co-authored the

Historic Property Survey Report (HPSR), Archaeological Survey Report (ASR), and Historic Resources Evaluation Report (HRER).

**Rio Tinto Borates. Historical Evaluation of the U.S. Borax Wilmington Facility, Los Angeles, California.**
Co-author that created a historical evaluation and DPR523 Update for the U.S. Borax Wilmington Facility located in Los Angeles. Conducted architectural field survey. Developed historic evaluation, integrity analysis and existing conditions report.

**United States Coast Guard, Morro Bay, Sacramento, and Pt. Loma National Register Evaluation Project, California.**
Assisted with the preparation of NRHP evaluations for three U.S. Coast Guard properties, including the Point Loma Light Station, Morro Bay Harbor Master's Office, and the Air Station Sacramento Maintenance Hangar. AECOM completed field surveys, extensive historic research, and development of historic contexts for each property, and architectural descriptions and identification of character-defining features. As a result of these investigations, the Point Loma Light Station was found eligible for listing in the NRHP as a historic district and individually eligible.

**County of San Diego. Historical Building Evaluation for the Creole Café Dining Room and Kitchen Buildings, San Diego, California.**
Evaluated the condition and integrity of two c.1869 Western False Front-style commercial buildings. Evaluated the property's eligibility for inclusion in federal, state, and local registers as individual resources and as contributors to a district. Prepared documentation in support of CEQA and Section 106 consultation on behalf of the County of San Diego.

**San Diego Gas & Electric (SDG&E). Cultural Resources Technical Report: Historic Significance Evaluation of Transmission Line 676, San Diego, California.**
Conducted fieldwork to record and evaluate the Kearny Mesa-Serra Mesa corridor of Transmission Line 676. Developed historic context and evaluations for the Mission Substation and the transmission line. Co-lead author to the cultural resources technical report

**SDG&E. Coastal Reliability Project Transmission Line 674A Del Mar Reconfigure and Transmission Line 666D Removal Project, San Diego, California.**
Conducted architectural field survey and generated DPR523 forms. Developed the historic context and evaluations for the Del Mar Substation and the Transmission Line 666 Del Mar transmission line.

**Lowe Enterprises, Town and Country Resort and Convention Center - Master Planning, San Diego, California.**
Conducted historical research using primary sources and unpublished internal documents. Conducted interviews with knowledgeable constituents. Assisted staff with generating technical reports for the City of San Diego.

**Southeastern Live Well Center IS/MND, San Diego, California.**
Provided expertise in historic resources to assist in the preparation of technical reports in compliance with CEQA/NEPA. Conducted field surveys, archival research, and completed evaluation of resources within the project area.

# APPENDIX B: SCCIC REPORT LIST

## Report List

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|---|---|---|---|---|---|---|
| LA-02577 | | 1992 | Wlodarski, Robert J. | Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California | Historical, Environmental, Archaeological, Research, Team | 19-000007, 19-000098, 19-000385, 19-000389, 19-000390, 19-000887, 19-001112, 19-001575 |
| LA-02644 | | 1992 | Wlodarski, Robert J. | The Results of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California | Historical, Environmental, Archaeological, Research, Team | 19-000385, 19-000389 |
| LA-02950 | | 1992 | Anonymous | Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project | Peak & Associates, Inc. | 19-000007, 19-000021, 19-000034, 19-000089, 19-000251, 19-000357, 19-000385, 19-000389, 19-000390, 19-000407, 19-000409, 19-000668, 19-000781, 19-000830, 19-000887, 19-000901, 19-000963, 19-001097, 19-001112, 19-001124, 19-001575, 19-001620 |
| LA-03036 | | 1994 | Maki, Mary K. | A Phase I Cultural Resources Survey of 0.66-acre at 2004 E. 88th Street Los Angeles County, California | Fugro West Inc. | |
| LA-04004 | | 1998 | Maki, Mary K. | Negative Phase I Archaeological Survey for the 2nd District Infill Housing Project/ #g89203 at 6024 South Hooper Avenue, Los Angeles County, California | Conejo Archaeological Consultants | |
| LA-04097 | | 1995 | Anonymous | Council District Nine Revitalization/recovery Program Final Environmental Impact Report | Myra L. Frank & Associates, Inc. | |
| LA-04470 | | 1999 | Unknown | Negative Phase I Archaeological Survey and Impact Assessment of .65 Acre for the Latchford Glass Phase Ii Project Los Angeles County, California | Conejo Archaeological Consultants | |
| LA-04625 | | 1994 | Starzak, Richard | Historic Property Survey Report for the Proposed Alameda Corridor From the Ports of Long Beach and Los Angeles to Downtown Los Angeles in Los Angeles County, California | Myra L. Frank & Associates | 19-174982, 19-174983, 19-174984, 19-174985, 19-174986, 19-174987, 19-174988, 19-174989, 19-174990, 19-174991, 19-174992, 19-174993, 19-174994, 19-177331, 19-180778, 19-180779, 19-180780, 19-180781, 19-180782, 19-180783, 19-180784, 19-180785, 19-188887, 19-188888 |

## Report List

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|---|---|---|---|---|---|---|
| LA-04737 | | 1999 | Maki, Mary K. | Negative Phase I Archaeological Survey and Impact Assessment of .9 Acres for the 7300 Roseberry Avenue Housing Project Cdc Project No. Jj7101, Hmd001, G89101 Florence, Los Angeles County, California | Conejo Archaeological Consultants | |
| LA-04834 | | 1999 | Ashkar, Shahira | Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties | Jones & Stokes Associates, Inc. | 19-186110, 19-186111, 30-176630 |
| LA-04836 | | 2000 | | Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project | Science Applications International Corporation | |
| LA-05572 | | 2000 | Maki, Mary K. | Negative Phase 1 Archaeological Survey and Impact Assessment of Approximately 0.5 Acre for the Holmes Childcare Center Project 6122 Holmes Avenue Florence, Los Angeles County, California | Conejo Archaeological Consultants | 19-002748 |
| LA-05577 | | 1996 | Wells, Helen Fairman | Phase I Cultural Resources Investigation of Franklin Delano Roosevelt Park Los Angeles County , California | Helen Fairman Wells | |
| LA-05685 | | 2002 | Duke, Curt | Cultural Resource Assessment Cingular Wireless Facility No. Sm 066-03 Los Angeles County, California | LSA Associates, Inc. | |
| LA-07059 | | 2003 | Maki, Mary K. | Phase 1 Archaeological Survey Report of 1.64 Acres for the Gage Village Housing Development Project Gage Avenue, Florence Los Angeles County, California | Conejo Archaeological Consultants | |
| LA-07068 | | 2002 | Marvin, Judith and Curt Duke | Cultural Resource Assessment At&t Wireless Services Facility No. 04095a Los Angeles County, California | LSA Associates, Inc. | |
| LA-07405 | | 2004 | Bonner, Wayne H. | Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate La60xc157a (florence Verizon) 7200 South Central Avenue, Los Angeles, Los Angeles County, California. | Michael Brandman Associates | |
| LA-07625 | | 2005 | Bonner, Wayne H. | Cultural Resources Records Search and Site Visit Results for Sprint Facility Candidate La70xc112b (mercado Del Pueblo), 6270 Wilmington Avenue, Los Angeles County, California | Michael Brandman Associates | |

## Report List

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|---|---|---|---|---|---|---|
| LA-07627 | | 2004 | Bonner, Wayne H. | Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate La60x180c (mitchell) 7702 Maie Avenue, Los Angeles, Los Angeles County, California | Michael Brandman Associates | |
| LA-07637 | | 2006 | Bonner, Wayne H. | Cultural Resources Records Search Results and Site Visit for T-mobile Usa Candidate La03051a (california Body Shop), 9303 South Alameda Street, Los Angeles, Los Angeles County, California | Michael Brandman Associates | |
| LA-07638 | | 2006 | Bonner, Wayne H. | Cultural Resources Records Search Results and Site Visit for T-mobile Usa Candidate La03341c (naomi Sce Substation), 7101 Compton Avenue, Los Angeles, Los Angeles County, California | Michael Brandman Associates | |
| LA-07643 | | 2004 | Bonner, Wayne H. | Records Search, Site Visit, and Direct and Indirect Historic Architectural Assessment for Cingular Telecommunications Facility Candidate Sm-341-03 (jems Ent Building) 1560 East Florence Avenue, Los Angeles, Los Angeles County, California | Michael Brandman Associates | 19-187700 |
| LA-07665 | | 2005 | Maki, Mary K. | Cdc-slauson Station Apartments | Conejo Archaeological Consultants | |
| LA-07667 | | 2004 | Maki, Mary K. | Phase 1 Archaeological Investigation of 18.3 Acres for the Florence & Alameda Commercial Center Project Walnut Park, Los Angeles County, California | Conejo Archaeological Consultants | |
| LA-07671 | | 2004 | Maki, Mary K. | Phase 1 Archaeological Investigation of 0.34 Acre for the 6305 Holmes Avenue Construction Project Florence, Los Angeles County, California | Conejo Archaeological Consultants | |
| LA-07703 | | 2004 | Bonner, Wayne H. | Indirect Ape Historic Architectural Assessment for Sprint Telecommunications Facility Candidate La60xc157a (florence Verizon) 7200 South Central Avenue, Los Angeles, Los Angeles County, California | Michael Brandman Associates | 19-187500 |
| LA-07867 | | 2005 | Tang, Bai "Tom", Michael Hogan, and Casey Tibbet | Historic-period Building Survey South Region High School #2 Project in an Unincorporated Area Near the City of Los Angeles, Los Angeles County, California | CRM Tech | |

## Report List

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|---|---|---|---|---|---|---|
| LA-07952 | | 2006 | Livingstone, David M., McDougall, Dennis, Goldberg, Susan K., and Nettles, Wendy M. | Trails to Rails: Transformation of a Landscape: History and Historical Archaeology of the Alameda Corridor, Volume 1 | Applied EarthWorks, Inc. | 19-002121, 19-002749, 19-002753, 19-002757, 19-002770, 19-002786, 19-002792, 19-002793, 19-002795, 19-002796, 19-002834, 19-002835, 19-002836, 19-002837, 19-002838, 19-002839, 19-002840, 19-002841, 19-002842, 19-002843, 19-002844, 19-002845, 19-002846, 19-002848, 19-002849, 19-002850, 19-002853, 19-002854, 19-002855, 19-002856, 19-002858, 19-002859, 19-002860, 19-002861, 19-002862, 19-002863, 19-002864, 19-002865, 19-002866, 19-002867, 19-002868, 19-002869, 19-002870, 19-002871, 19-002872, 19-002874, 19-002877, 19-002878, 19-002879, 19-002880, 19-002881, 19-002882, 19-002883, 19-002884, 19-002941, 19-002942, 19-002943, 19-003042, 19-003043, 19-003044, 19-003045, 19-003046, 19-003047, 19-003048, 19-003049, 19-003050, 19-003051, 19-003052, 19-003053, 19-003054, 19-003055 |
| LA-07987 | | 2006 | Bonner, Wayne H. and Kathleen A. Crawford | Direct Ape Historic Architectural Assessment for T-mobile Usa Candidate La03341c (naomi Sce Substation), 7101 Compton Avenue, Los Angeles, Los Angeles County, California | Michale Brandman Associates | |
| LA-08255 | | 2006 | Arrington, Cindy and Nancy Sikes | Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and Ii | SWCA Environmental Consultants, Inc. | |
| LA-08499 | | 2007 | Shaver, Noelle C.S. | A Phase I Archaeological Study for the South Region High School No. 13, Community of Walnut Park, Unincorporated Los Angeles County, California | Jones & Stokes Associates, Inc. | |
| LA-08766 | | 2006 | Bonner, Wayne H. | Cultural Resources Records Search and Site Visit Results for Global Signal Candidate 3019372 (salome), Located at 1150 East 58th Place, Los Angeles, Los Angeles County, California | Michael Brandman Associates | |

## Report List

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|---|---|---|---|---|---|---|
| LA-08853 | | 2006 | Bonner, Wayne H. | Cultural Resources Records Search and Site Visit Results for T-mobile Candidate La13082a (leon Elster), 8145 Beach Street, Los Angeles, Los Angeles County, California | Michael Brandman Associates | |
| LA-08955 | | 1983 | King, Phil V. | Final Report for Year Three Historical and Cultural Resources Survey of Los Angeles: Sylmar, Watts, Crenshaw, and Vermont/slauson | Los Angeles Department of Public Works | 19-169869, 19-169870 |
| LA-09190 | | 2007 | Bonner, Wayne H. | Cultural Resources Records Search and Site Visit Results for T-Mobile Canidate LA03051D (SCE Caldon), Near 8866 Juniper Street, Southeast Corner of 88th Street and Juniper Street, Los Angeles, Los Angeles County, California | Michael Brandman Associates | 19-002856, 19-186110 |
| LA-09640 | | 2008 | Maki, Mary K. | Alameda Seniors Housing Project, Huntington Park | Conejo Archaeological Consultants | |
| LA-09641 | | 2008 | Smith, Francesca and Caprice D. Harper | Cultural Resources Initial Technical Report and Phase I Site Investigation Proposed South Region Middle School No. 3 Project, Walnut Park, Los Angeles County, California. | SWCA Environmental Consultants | 19-188399, 19-188400 |
| LA-09642 | | 2008 | Smith, Francesca and Caprice D. Harper | Cultural Resources Intensive Survey Report, Proposed South Region Middle School No. 3 Project, Walnut Park, Los Angeles County, California. | SWCA Environmental Consultants | 19-188399, 19-188400 |
| LA-10524 | | 2000 | Horne, Melinda C., M. Colleen Hamilton, and Susan K. Goldberg | Alameda Corridor Project Treatment Plan for Historic Properties Discovered During Project Implementation, second draft. Addendum to Finding of Effect (February 21 1995; October 27, 1998) | Applied Earthworks | 19-002682, 19-002753, 19-002757, 19-002770 |
| LA-10593 | | 2010 | Brunzell, David | Cultural Resources Assessment - Jordan Downs Specific Plan Project, Watts Community of Los Angeles, California | BCR Consulting | 19-002868, 19-002872, 19-100486, 19-165329, 19-187720, 19-188779 |
| LA-11754 | | 2010 | Lewicki, Pauline | Wattstar Theater and Education Center Addendum to the Initial Study/Mitigated Negative Declaration, Community Redevelopment agency of the City of Los Angeles | Community Redevelopment Agency of the City of Los Angeles | |

## Report List

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|---|---|---|---|---|---|---|
| LA-11755 | | 2010 | Brunzell, David | Cultural Resources Assessment Wattsatr Cinema and Ecuation Center Project Watts Community of Los Angeles, California | BCR Consulting | 19-000385, 19-002657, 19-002757, 19-002792, 19-002848, 19-002856, 19-002868, 19-002872, 19-003108, 19-100486, 19-100585, 19-100858, 19-186641, 19-187720 |
| LA-11966 | | 2012 | Shaffer, Caleb | Consultation Under Section 106 of the National Historic Presevation Act ofr a Federal Permitting Project at Clean Harbors Los Angeles | Untied States Environmental Protection Agency | |
| LA-12798 | | 2014 | Anderson, Katherine | Los Angeles Unified School District Five Campus Building Inventory, City of Los Angeles, California | ESA | 19-175478, 19-190950, 19-190951, 19-190952, 19-190953 |

# APPENDIX C: CHAPTER 3 FROM THE FLORENCE-FIRESTONE COMMUNITY ATLAS REPORT

# 3 Urban Design and Civic Arts Analysis

## 3.1 Urban Design

The following sections examine and assess how the existing built environment contributes to walkability, transit access, and community character. From an urban design perspective, places with strong identity define a community's character, helping to create strong social, cultural and economic conditions. Community character can be seen in building form, scale, land use, and design – all elements which reflect the community itself. This section analyzes these elements, specifically public art and cultural spaces, architecture, building size and location, public realm (sidewalks, street trees, crossings) and open space in the Plan Area. Community character can be promoted or eroded by regulatory choices, and therefore are important to assess as part of fundamental existing conditions for the project.

The findings and recommendations from this section will help to identify key physical conditions, constraints, and barriers to potential TOD in the community.

### 3.1.1 Block Pattern and Alleys

The size of urban blocks and the presence of alleys help to determine the ease in which a pedestrian, or person walking, can access their destination. Smaller block sizes can enhance "walkability" by reducing the distances between destinations. Generally, a walkable block length is between 200 and 400 feet and should not exceed 600 feet according to ITE (Institute of Traffic Engineers) practice.

The presence of alleys can also contribute to a more pedestrian-friendly environment by:

- Enabling a secondary access for pedestrian and vehicles;
- Reducing the need for driveways to be accessed from primary streets (like Compton Avenue);
- Allowing for parking to be located along the alley (behind buildings) that front along the primary corridor, contributing to a more walkable area when buildings are near the street;
- Supporting parcel consolidation when a shared alley is available;
- Allowing for functional elements (like trash and utilities) to be located along the alley, away from the sidewalk; and
- Creating additional locations for green spaces, such as linear parks, or more active uses, such as pedestrian pathways for recreation or socializing, as outlined in the FFCP. As a "very high" park need community as identified in the Los Angeles County Park Needs Assessment, alleys are a potential creative solution to address multiple issues in the Florence-Firestone community.

While alleys can help to improve walkability, they can also present a public safety concern if they are not well utilized and maintained and instead become places for illegal dumping, graffiti, and crime, as mentioned in the FFCP.

**Figures 13** through **15** identify the general dimension of blocks and the location of alleys.

Compton Avenue blocks are generally small and walkable in this area, ranging from approximately 300 to 440 feet measured north-south. The pattern is varied with generally longer blocks on the east side of the street (approximately 600 feet measured north-south) with a frequency of east-west streets intersecting Compton Avenue from the west, which creates

shorter blocks on the west side. Florence Avenue, Firestone Avenue, and Nadeau Street have a similar pedestrian block size ranging from 300 to 600 feet measured east-west; the mix of commercial with residential immediately behind creates a variety of block sizes.

Although intersections occur at a walkable interval, the spacing between crosswalks and signalized crosswalks at intersections can span between 600 and 1,250 feet, which makes pedestrian crossing of Compton Avenue difficult and significantly reduces the walkability of the area. These infrequent crossings constrain the pedestrian's ability to move east-west in the community, which is essential for transit access.

An additional barrier to walking is the Metro rail line that bisects the community north to south.

Interior residential blocks east of Compton Avenue are generally about 700 feet north-south and about 310 feet east-west. Blocks west of Compton Avenue are much larger with an approximate 1,250 feet east-west dimension, which reduces walkability access getting to Compton Avenue or farther east to the Metro stations.

Slauson Avenue, due to the presence of industrial and utility properties, has a much larger-scale block pattern of approximately 500 to 1,200 feet measured east-west. The exception to this is the commercial/residential blocks between Compton Avenue and Mira Monte Boulevard; these blocks are about 300 feet measured east-west. This key location may be a prime opportunity to facilitate pedestrian and bicycle travel between the Slauson Metro Blue Line Station and the commercial and residential TOD opportunities to the southwest.

Generally, the block size in the community is considered walkable; however, due to the limited pedestrian signal and crossing frequency, automobile-oriented streets, and the Metro rail line that bisects the community north to south, the Study Area lacks a cohesive walking network to support higher transit ridership. At Slauson Station in particular, pedestrians must use an at-grade rail crossing to access the station, increasing safety concerns, especially for parents with young children and older adults or persons with disabilities.

## FINDINGS + RECOMMENDATIONS

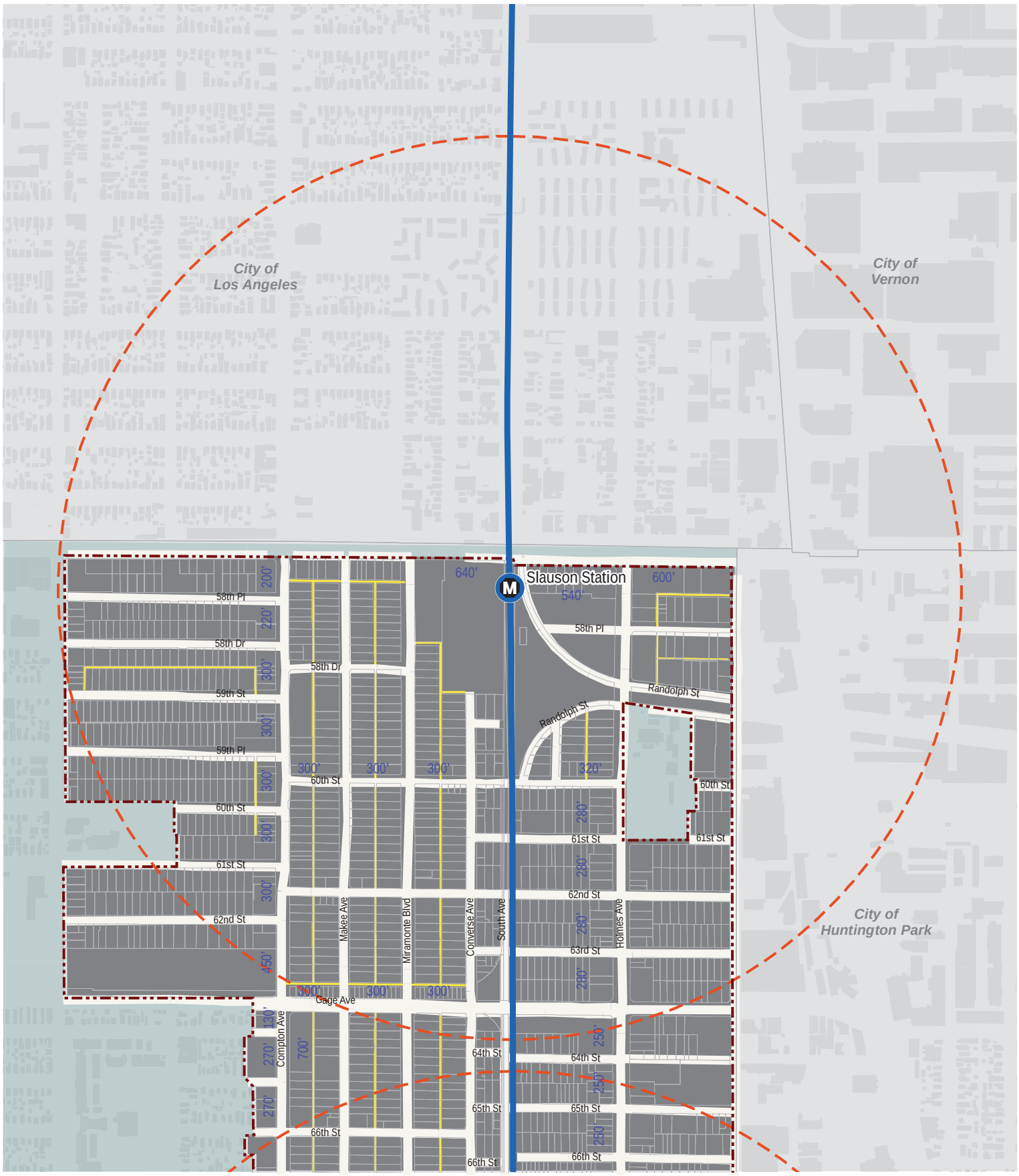
### Findings

- Commercial boulevard blocks are highly walkable dimensions at between 300 feet and 440 feet.
- East-west blocks west of Compton Avenue are substantially longer, creating challenges to walk to Compton Avenue or further east to the Metro stations.
- Despite general walkable block size in the community, safety is a concern for the Study Area due to limited pedestrian signal and crossing frequency, automobile-oriented streets, and the Metro rail line that bisects the community north to south.
- Presence of alleys in a variety of locations supports walkable TOD configurations; however, as noted in the FCCP, some alleys have a negative perception due to illegal dumping, graffiti, and crime.

### Recommendations

- Support preservation or creation of new alleys and paseos to increase access points and enable a variety of building and housing configurations.
- Where parcel consolidation is undertaken in larger east-west blocks, require north-south street or paseo connections to reduce block length.
- Increase pedestrian east-west signal and crosswalk frequencies to manage block length and increase access to transit.
- Identify opportunities for conversion of select alleys to green spaces or multi-use path networks for walking and biking given the large presence of alleys and the “very high” park need identified in this community. Candidate alley conversions can be based on locations where there is opportunity to connect to/from the Metro stations as well as locations where there is a clustering of residents to encourage utilization.
- To help increase alley safety, investigate opportunities for increasing pedestrian lighting through new development adjacent to existing alleys.

**Figure 13: Block Patterns and Alleys – Slauson Metro A Line (Blue) Station**

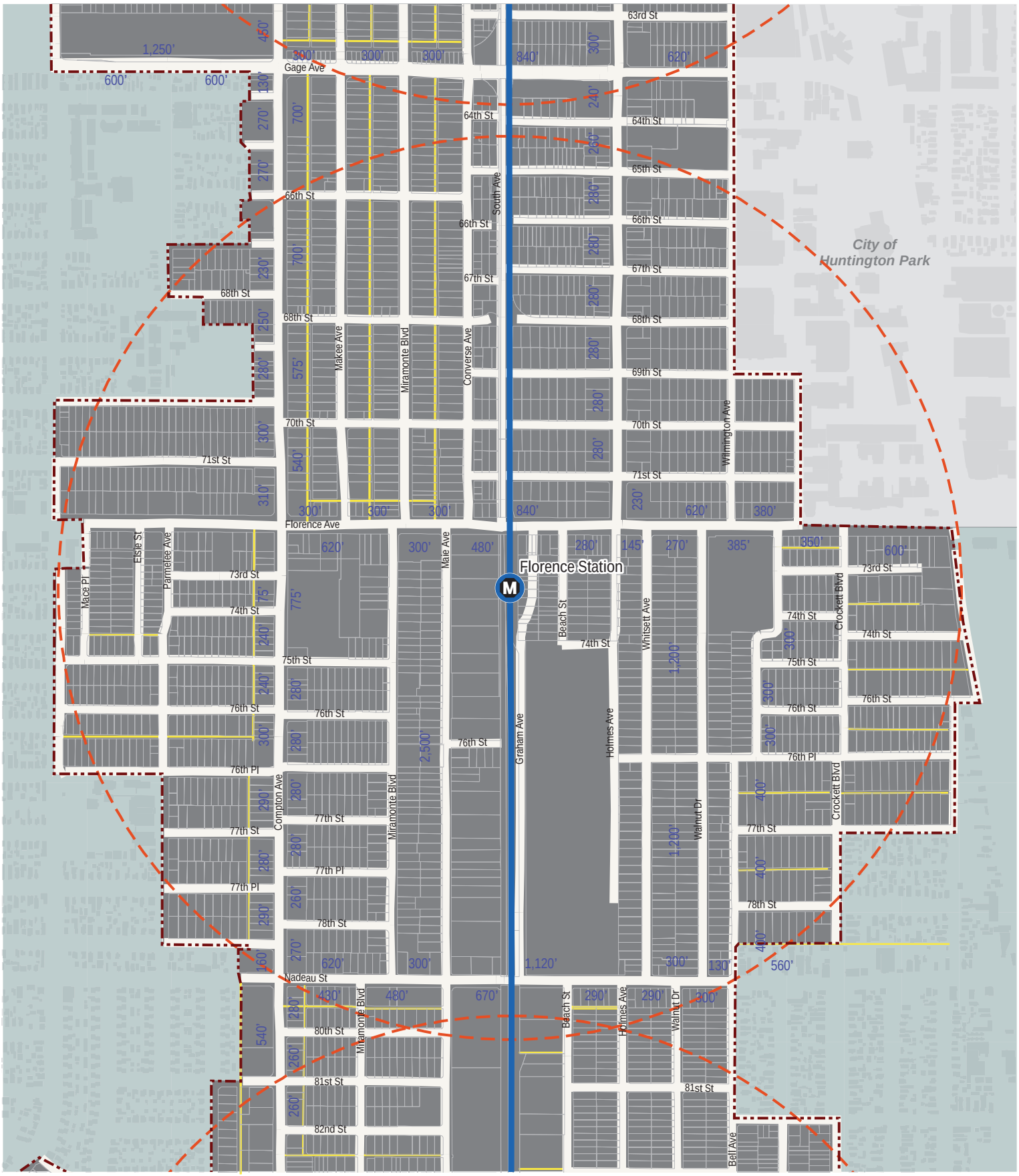



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Block
#' Block Size
Alley

0 375 750 Feet

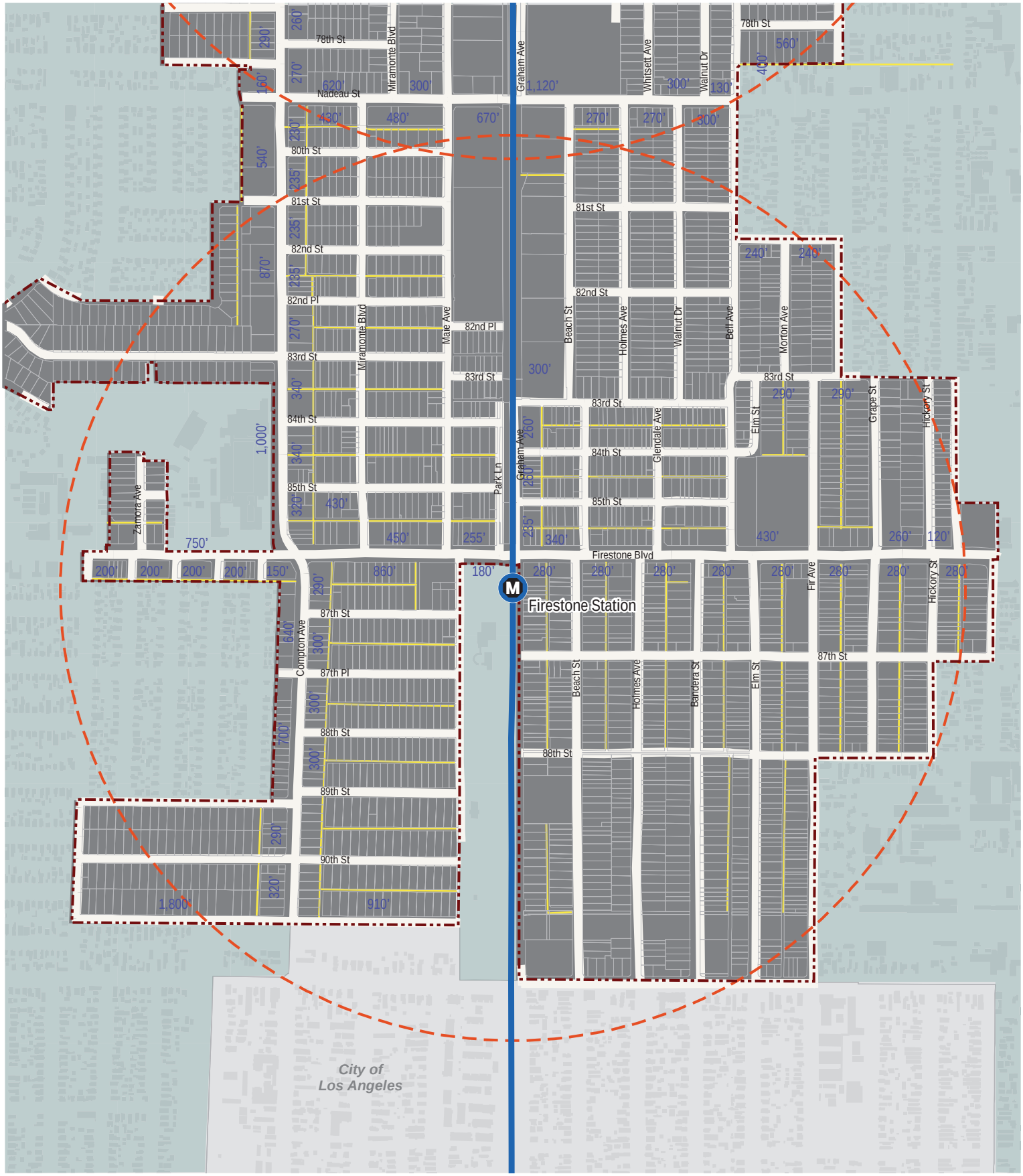
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 13: Block Patterns and Alleys – Florence Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 15: Block Patterns and Alleys – Firestone Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Block
#' Block Size
Alley

Feet
0 375 750

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## 3.1.2 Lot Depths and Parcel Size

Lot depth and parcel size are indicators of the amount of space available for development. New development and TOD generally utilize larger parcels or consolidated parcels to achieve the intensity and market viability needed.

Parcels in the Study Area are generally small in size with a large number of parcels that are narrow in width. Generally, the depth of lots around 140 feet is considered a very buildable depth for small-scale commercial and a range of residential densities. Especially where alleys are located, parcel depths in excess of 110 feet are appropriate for medium- to larger-scale infill development. Lot depth decreases south of Firestone Boulevard, making redevelopment along Compton Avenue more challenging in that area. Lot widths throughout the study area are generally narrow:

- Residential parcels are typically approximately 45 to 50 feet in width.
- Commercial parcels are typically approximately 50 to 100 feet, with some parcels as narrow as 22 feet and some parcels with relatively large widths of 150 feet or more.
- Industrial parcels are approximately 50 feet in width; however, there is a variety of configurations with greater widths that do not present a “typical” condition.

Narrow lot widths pose configuration challenges for new development, which indicates parcel consolidation will likely be required where more intense development is desired.

Catalytic opportunities for TOD would be most likely on the largest parcels or where parcel consolidation can occur (shared property ownerships or acquired parcels) to support larger developments.

**Figure 16** through **Figure 18** identify the general lot depths in the Study Area.

## FINDINGS + RECOMMENDATIONS

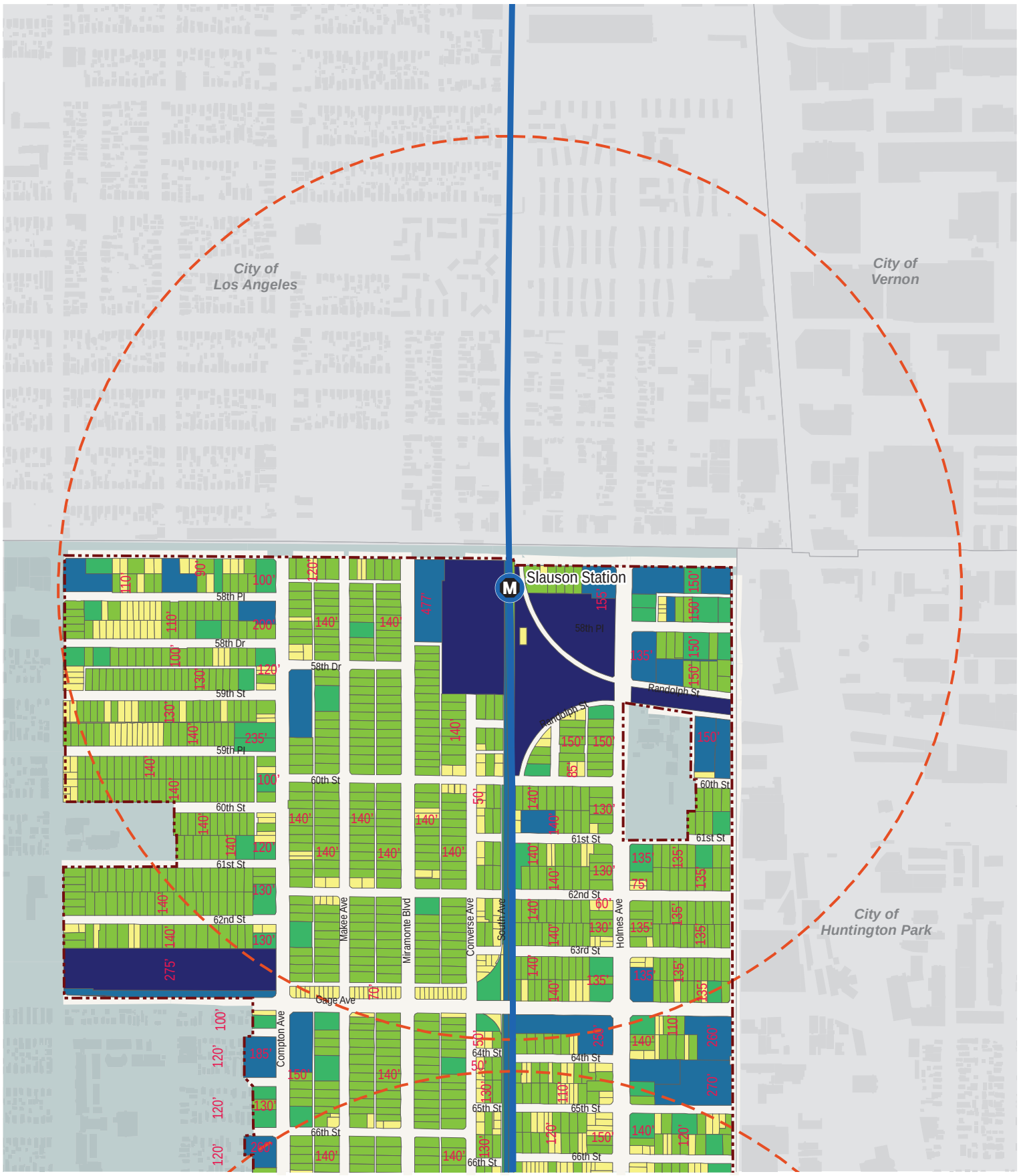
**Findings**

- Lot depths and parcel sizes vary throughout the Study Area.
- Commercial corridor depths and industrial depths are appropriately sized.
- Residential depths of about 140 feet are common and suitable for development at higher densities.
- Smaller lot sizes are challenging for TOD and may hinder investment in the area.
- Key locations near the Slauson Metro Blue Line Station are larger parcels with appropriate size to support TOD.

**Recommendations**

- Seek lots of 140 feet in depth or greater with rear alleys as prime candidates for intensification.
- Establish standards that incentivize parcel consolidation at key locations to support TOD intensification.
- Incentivize parcel consolidation where more intense development investment is desired to overcome narrow lot width conditions.
- Where parcel consolidation happens in larger east-west blocks, require north-south street or paseo connections to reduce block length.

**Figure 16: Lot Depth and Parcel Size – Slauson Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)

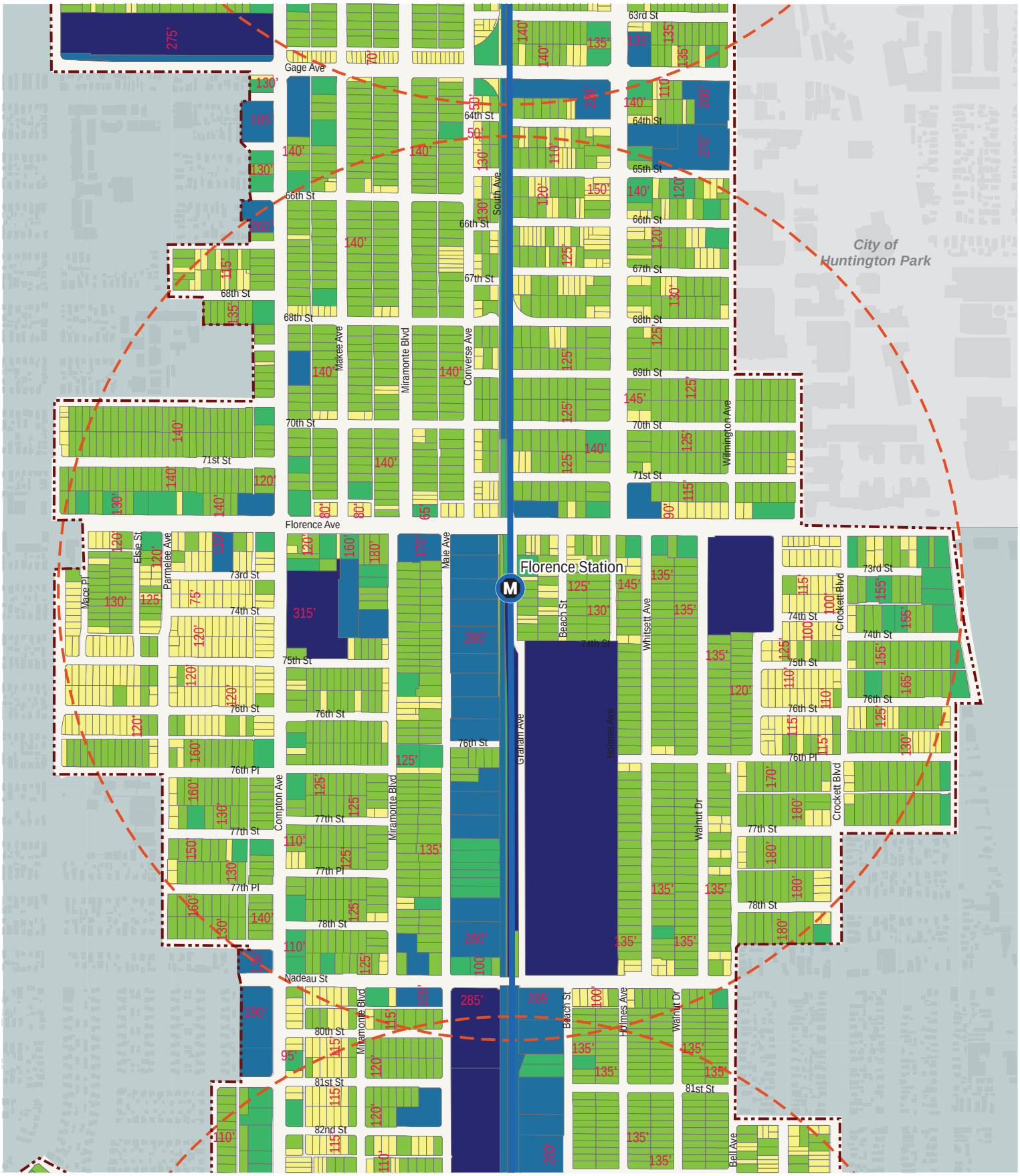
Assessor Parcel
#' Lot Depth

**Parcel Area (Square Feet)**
Less than 5,000 sq. ft.
5,000 sq. ft. - 10,000 sq. ft.
10,001 sq. ft. - 25,000 sq. ft.
25,001 sq. ft. - 100,000 sq. ft.
Greater than 100,000 sq. ft.

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 17: Lot Depth and Parcel Size – Florence Metro A Line (Blue) Station**



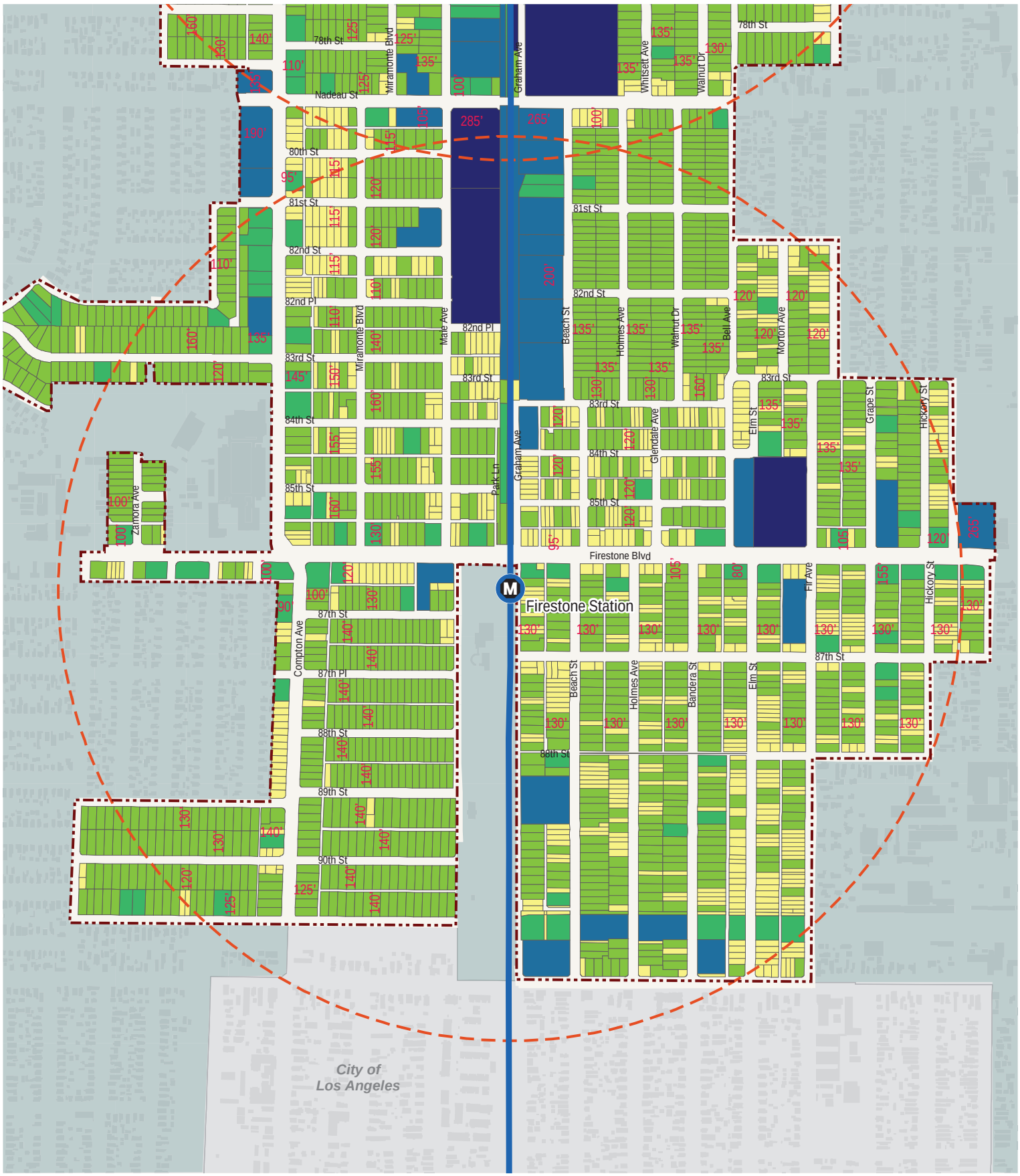

Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
#' Lot Depth

**Parcel Area (Square Feet)**
Less than 5,000 sq. ft.
5,000 sq. ft. - 10,000 sq. ft.
10,001 sq. ft. - 25,000 sq. ft.
25,001 sq. ft. - 100,000 sq. ft.
Greater than 100,000 sq. ft.

Feet
0 375 750

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 18: Lot Depth and Parcel Size – Firestone Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)

Assessor Parcel
#' Lot Depth

**Parcel Area (Square Feet)**
Less than 5,000 sq. ft.
5,000 sq. ft. - 10,000 sq. ft.
10,001 sq. ft. - 25,000 sq. ft.
25,001 sq. ft. - 100,000 sq. ft.
Greater than 100,000 sq. ft.

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## 3.1.3 Property Ownership

Property ownership patterns are shown in **Figure 19** through **Figure 21**. Most blocks in the Study Area are owned by multiple landowners with few areas of consecutive ownership.

**Figure 22** through **Figure 24** identify landholdings owned by public entities in the Study Area, which include a variety of owners, including a variety of County of Los Angeles departments such as Los Angeles Department of Water and Water (LADWP), Los Angeles Metropolitan Transit Authority, and others. A large number of publicly owned parcels are clustered around the Metro right-of-way; however, several Los Angeles County-owned, State of California, and LADWP parcels are scattered throughout the three TOD station areas with either single or multiple, contiguous parcels.

**Figure 25** through **Figure 27** identify the large land hold groupings ranked by entity. Within the Metro Slauson Blue Line TOD Station, the largest landholder owns 13 contiguous parcels at the southeast intersection of Gage Avenue and Holmes Avenue, north of 68th Street and west of the Study Area boundary. Within the Metro Florence Blue Line TOD Station, the largest landholder owns 12 parcels, which are focused along Compton Avenue, between 76th Street and 78th Street, and a combination of single parcels or multiple, continuous parcels. Within the Metro Firestone Blue Line TOD Station, the largest landholder owns nine contiguous parcels along the southern side of Nadeau Street between Compton Avenue and Maie Avenue.

FINDINGS + RECOMMENDATIONS

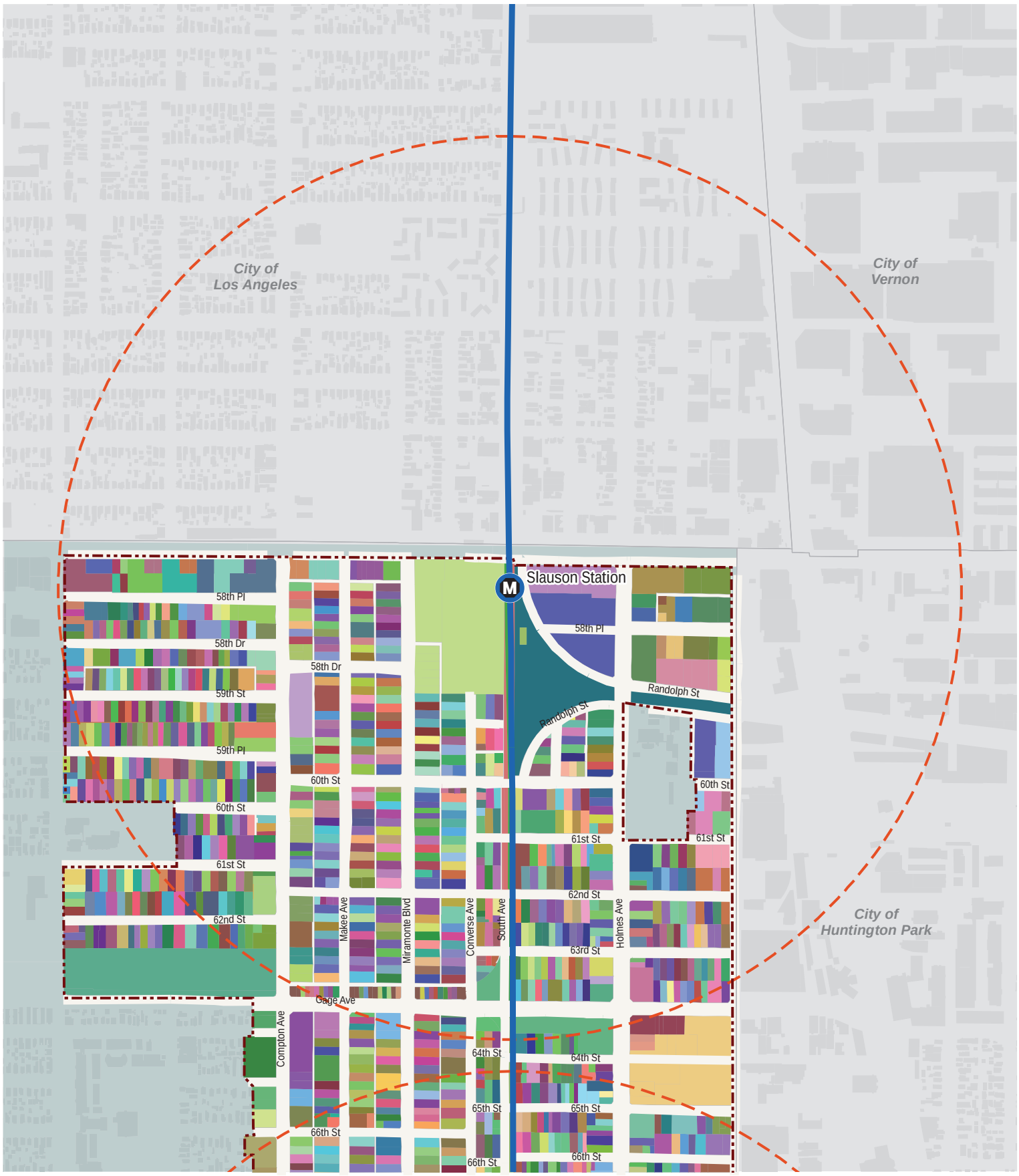
**Findings**

- Most blocks in the Study Area are owned by multiple landowners with few areas of consecutive ownership.

**Recommendations**

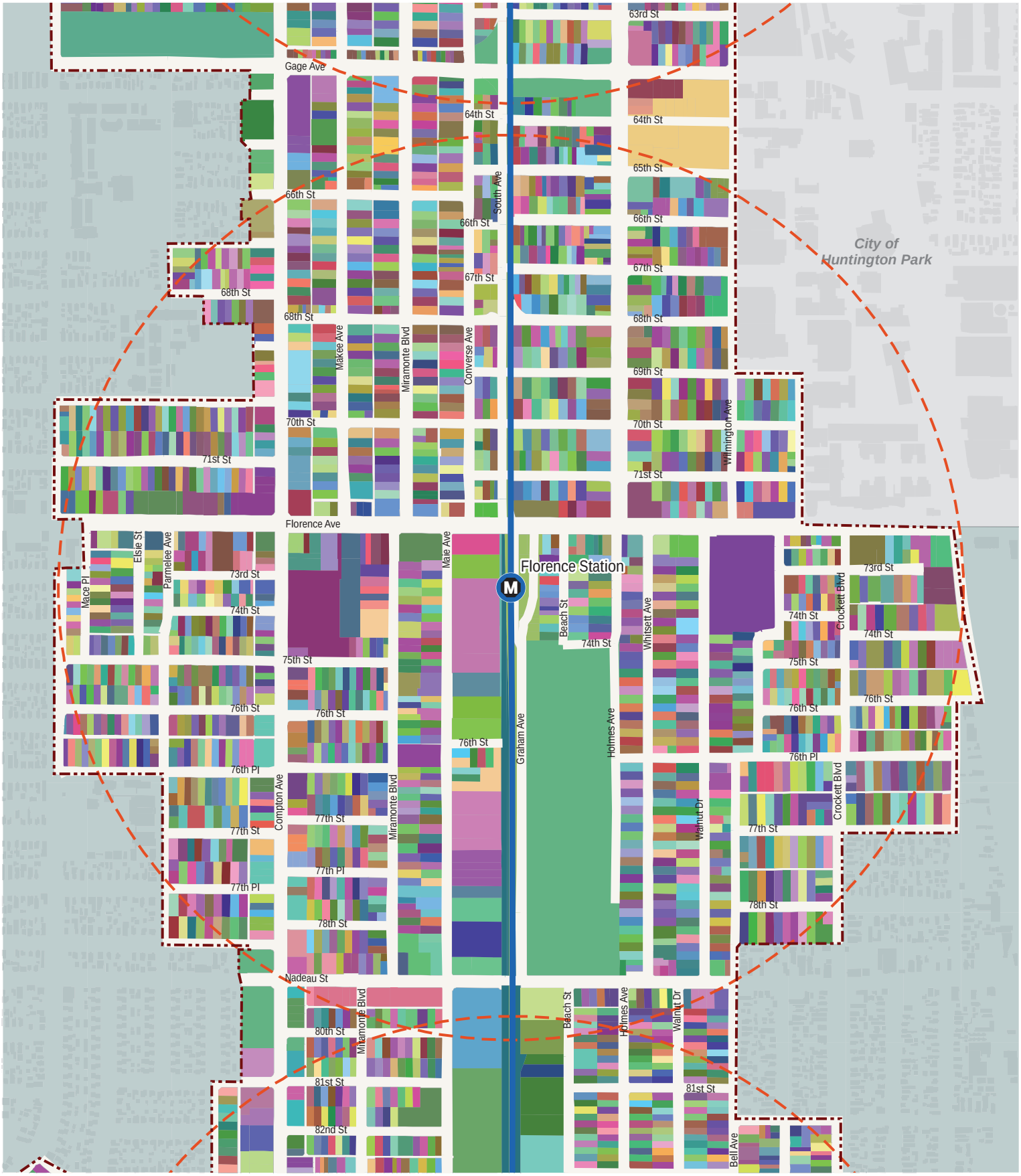
- Consider the need to address phasing and coordination with multiple entities when establishing standards for public realm improvements.
- Consider strategic partnerships with entities owning large landholdings, such as the top 10 largest owners illustrated in Figures 25 through 27, particularly those owning multiple contiguous parcels, which form significant redevelopment opportunities.

**Figure 19: Property Ownership – Slauson Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 20: Property Ownership – Florence Metro A Line (Blue) Station**




Study Area

Florence-Firestone

1/2 mile TOD Radius

Metro Station

Metro A Line (Blue)

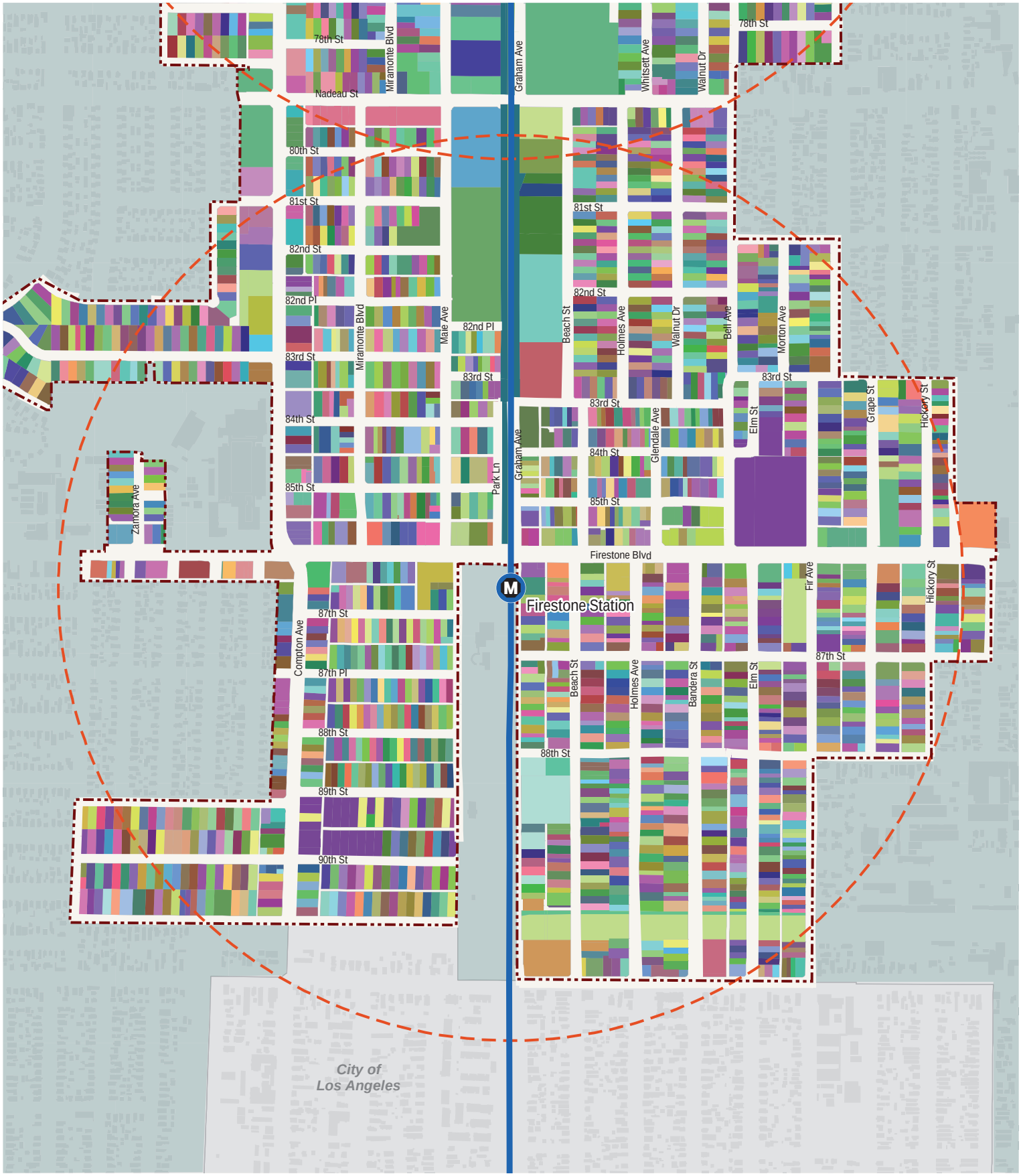
Assessor Parcel

Feet

0 375 750

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 21: Property Ownership - Firectone Metro A Line (Blue) Station**

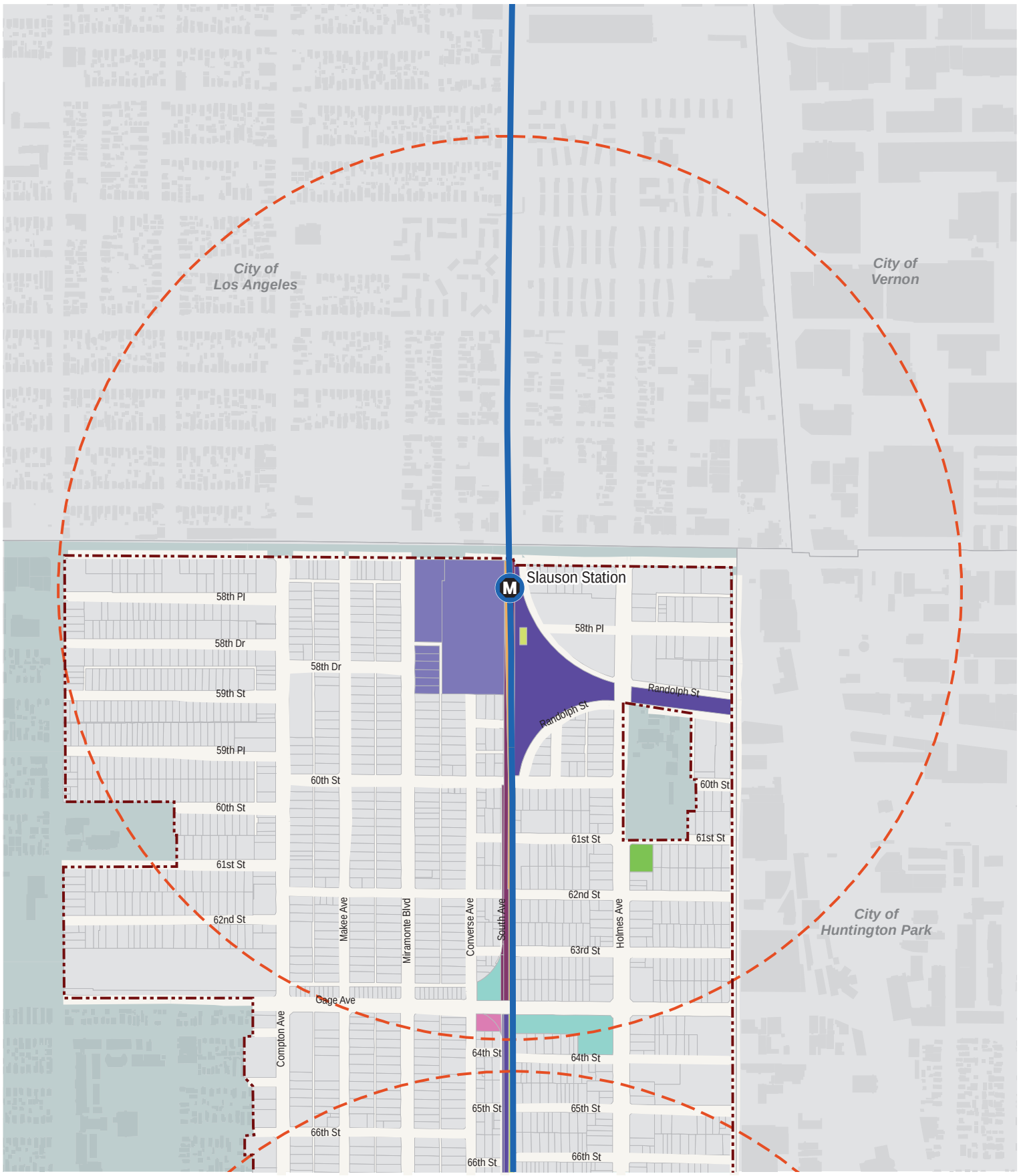



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel

Feet
0 375 750

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 22: Public Landowners – Slauson Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)

Assessor Parcel

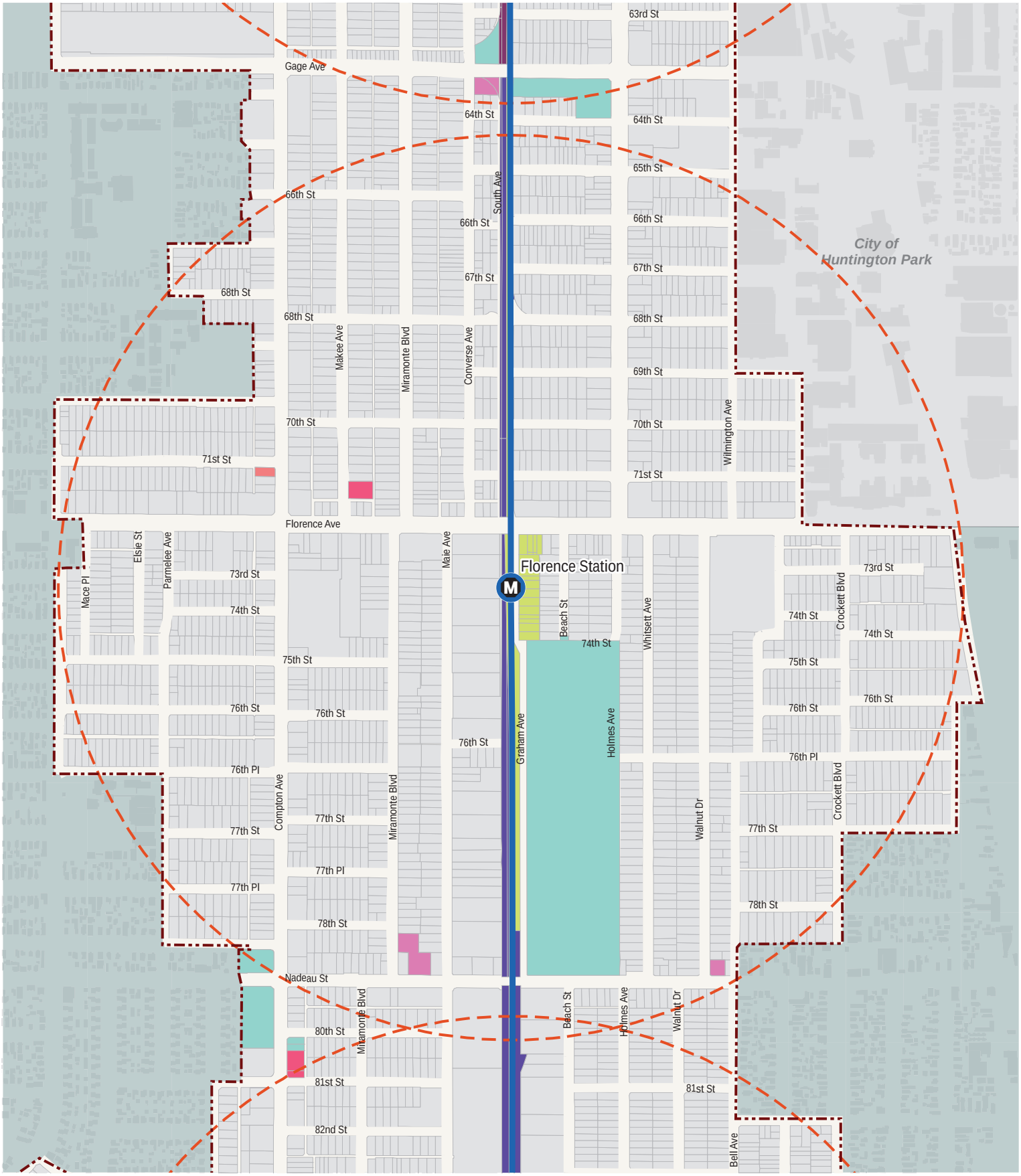
**Public Ownership**

LADWP
LA County Community Dev
LA County Metropolitan
LA County
LACMTA
SoCal Water Co
Sou Pac Trans Co
Union Pacific RR

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 23: Public Landowners – Florence Metro A Line (Blue) Station




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)

Assessor Parcel

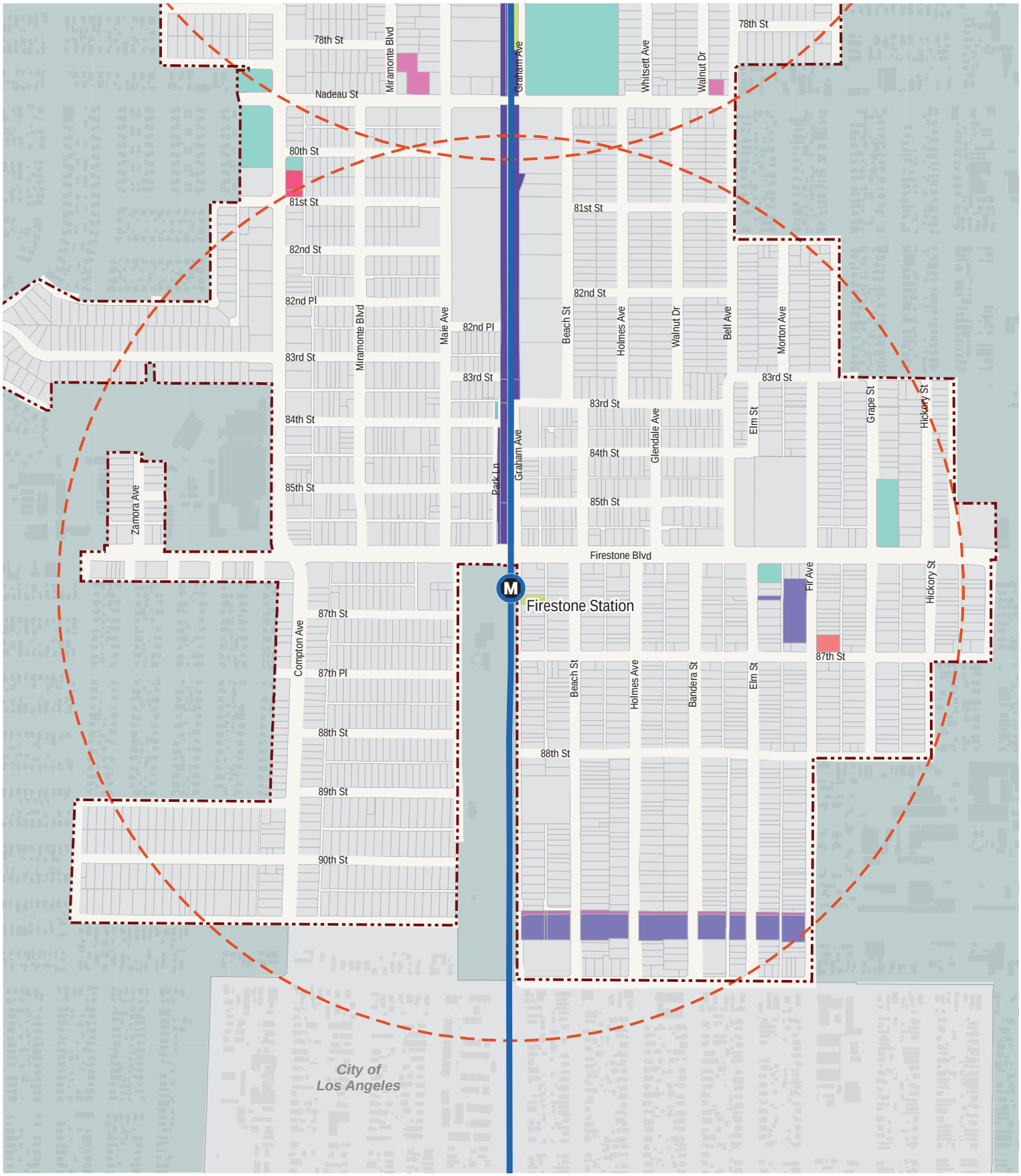
**Public Ownership**

LA County Consolidated Fire
SoCal Edison Co
LA County Metropolitan
LA County
LACMTA
SoCal Water Co
Sou Pac Trans Co
Union Pacific RR

Feet
0 375 750

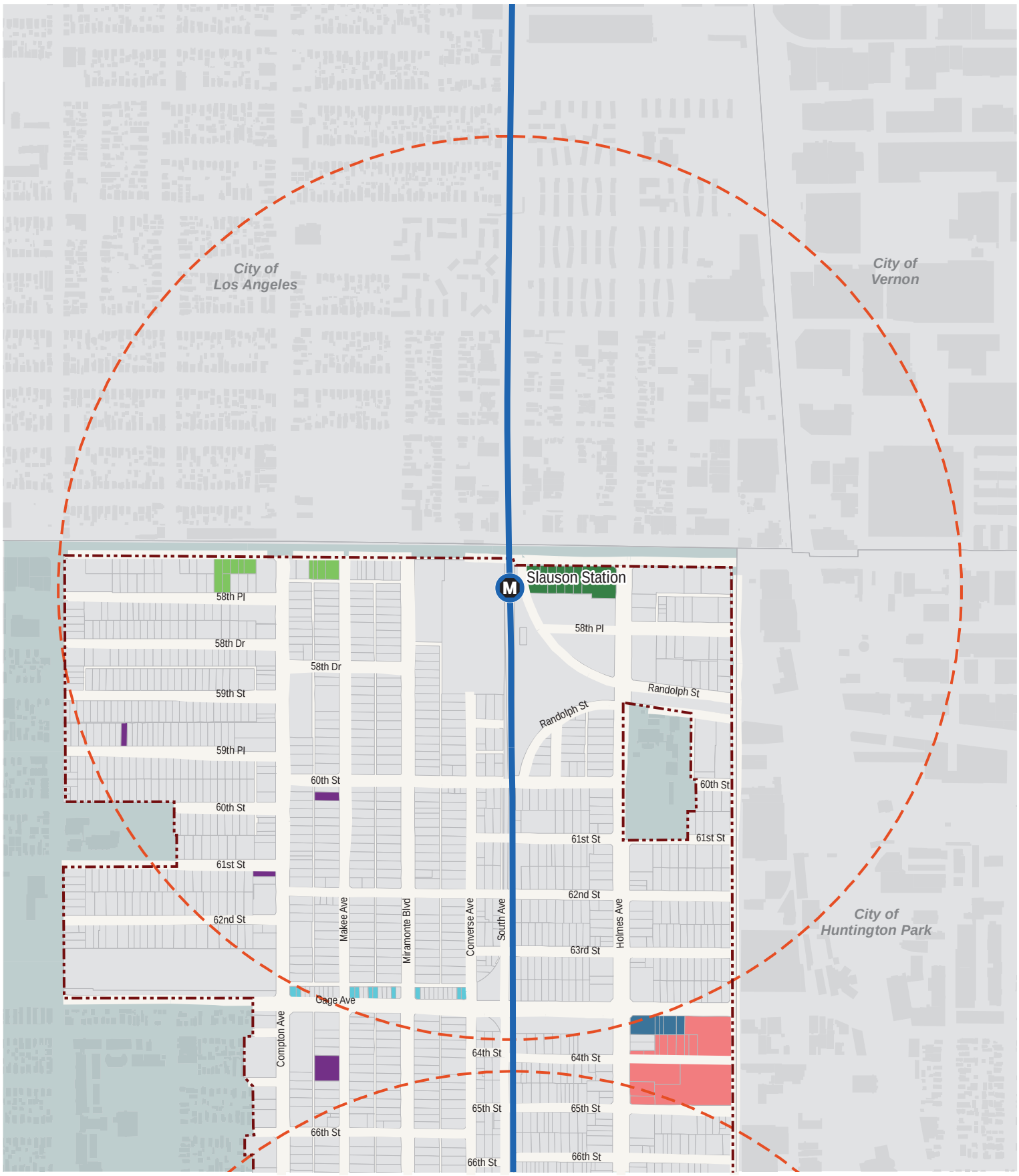
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 24: Public Landowners – Firestone Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 25: Largest Landholdings – Slauson Metro A Line (Blue) Station**



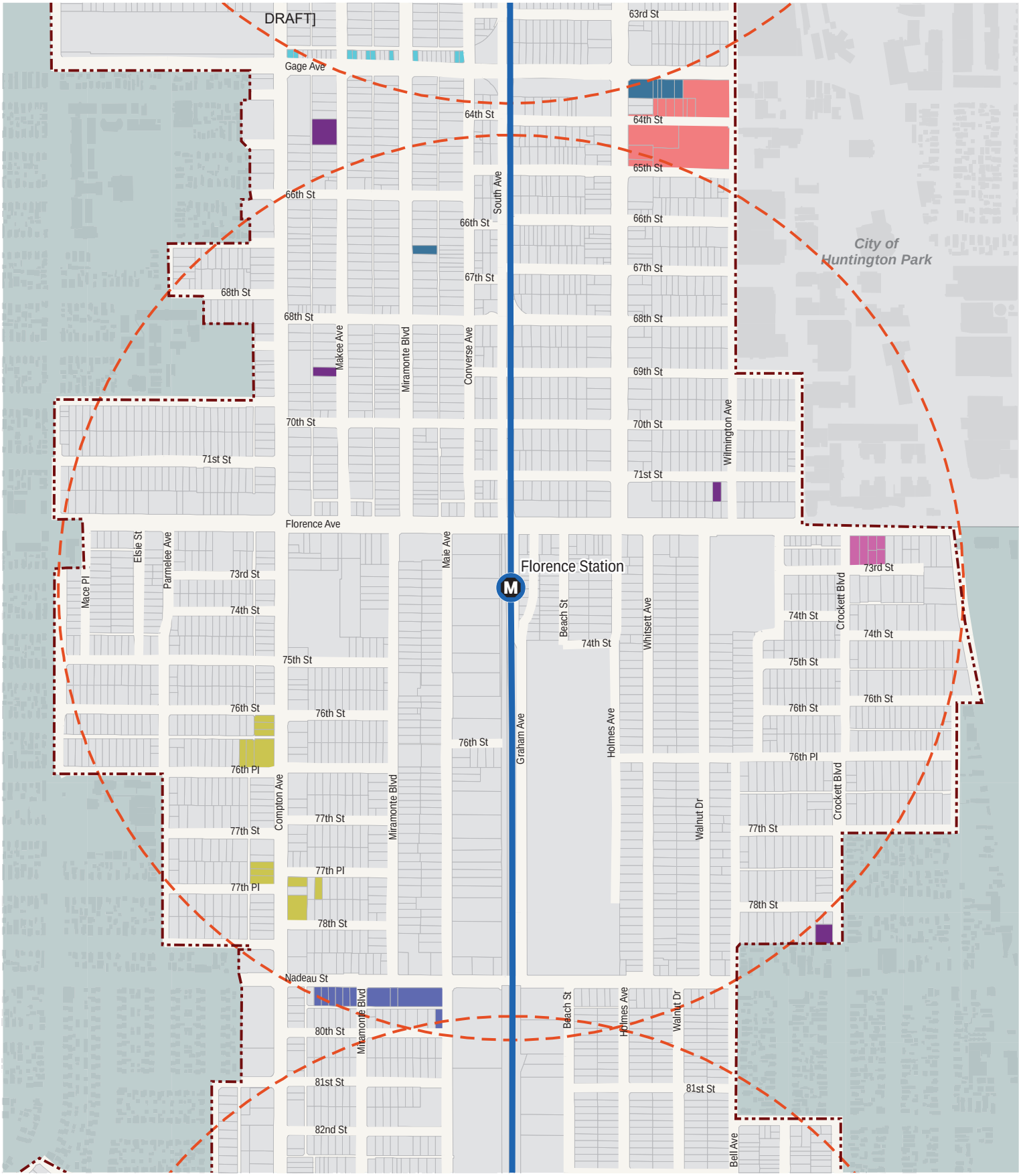

Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel

**Owner Rank (No. Parcels)**
#1 Largest Owner (13)
#3 Largest Owner (10)
#4 Largest Owner (10)
#6 Largest Owner (8)
#9 Largest Owner (6)
#10 Largest Owner (6)

Feet
0 375 750

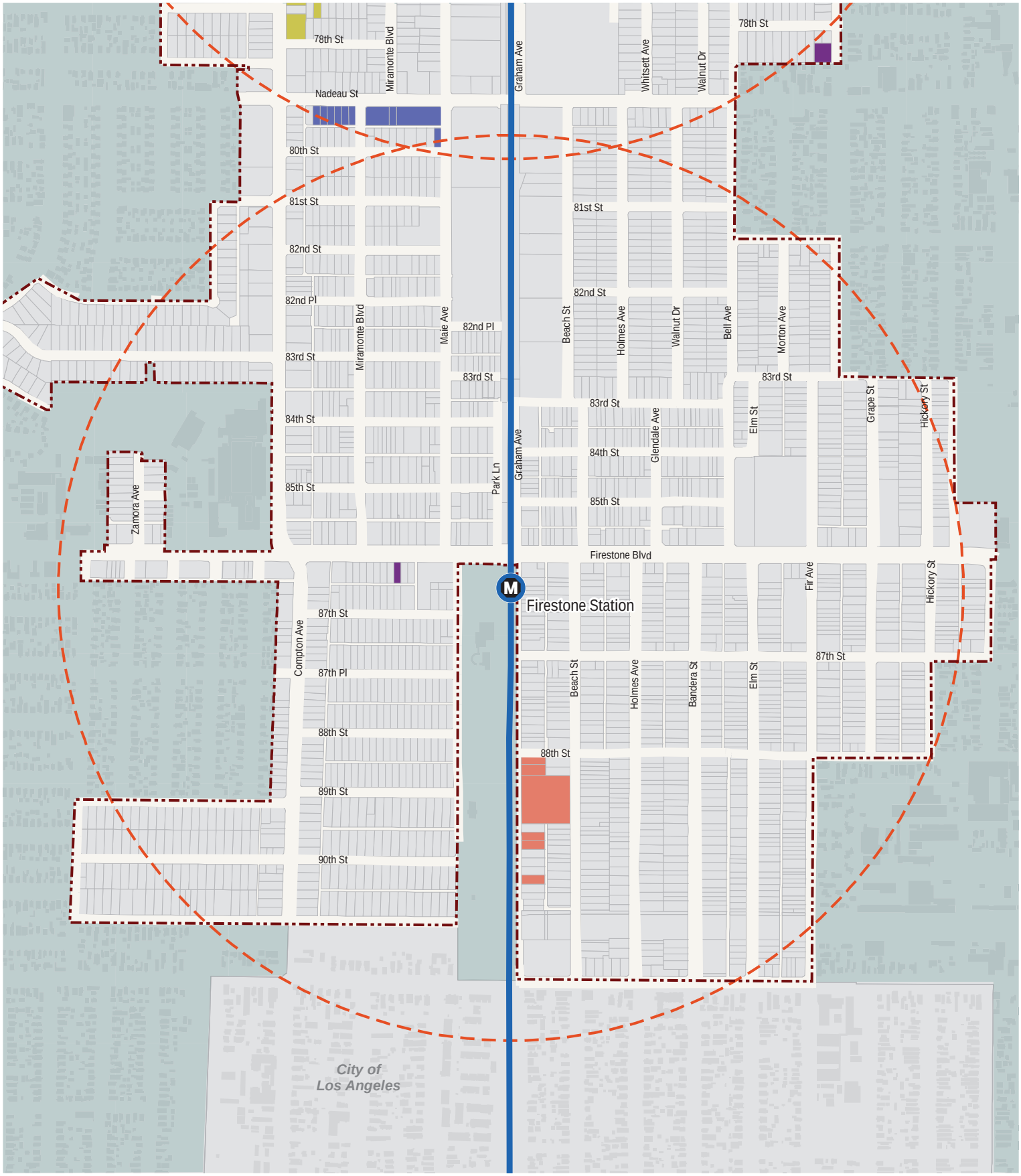
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 26: Largest Landholdings – Florence Metro A Line (Blue) Station




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 27: Largest Landholdings – Firestone Metro A Line (Blue) Station




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
**Owner Rank (No. Parcels)**
#2 Largest Owner (12)
#5 Largest Owner (9)
#7 Largest Owner (6)
#10 Largest Owner (6)

0 375 750 Feet

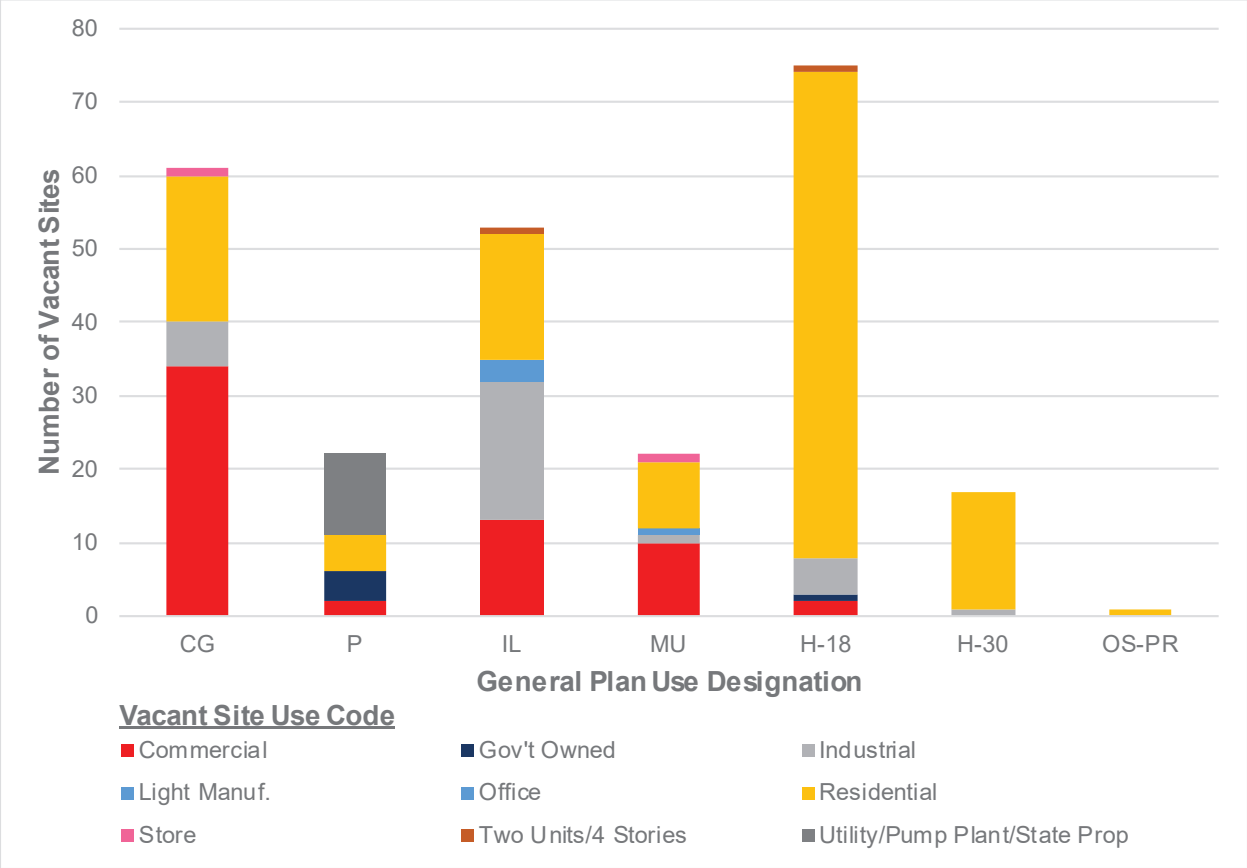
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## 3.1.4 Parking and Vacant Sites

**Figure 29** through **Figure 31** identify parking lots and vacant sites. Overall, the Study Area has a very limited supply of parking lots and vacant sites. Generally vacant sites and parking lots represent opportunities to increase intensity by repurposing sites without disrupting existing development. Utilization of vacant sites can be straightforward and subject to property owner action. Therefore, a limited presence of these sites in the Study Area indicates constrained redevelopment opportunity.

While vacant lots are somewhat limited (251 total), a breakdown of vacant sites by Los Angeles County Assessor Use Code (existing land use) and General Plan land use designation, is included in Table 7 for reference. As show in Table 7, the most common vacant site existing land use is residential (yellow), followed by commercial (red). The General Plan land use designation H-18 has the highest number of vacant sites (75), the vast majority of which are existing residential uses (66).

**Figure 28: Vacant Sites Use Code by General Plan Land Use Designation**




Utilization of parking lots needs to be evaluated to identify impacts on surrounding businesses. Development of parking lot sites should also consider their impact on the immediately adjacent neighborhoods. In previous public outreach forums, the Florence-Firestone community has expressed that parking in residential neighborhoods is congested, which will need to be considered when developing parking sites, as well as when considering changes to parking ratios or increasing density in residential areas. A balanced approach to increase transit access to reduce reliance on/need for cars and “right sizing” parking standards is recommended.

See the Mobility and Equity Study for additional information related to parking.

## FINDINGS + RECOMMENDATIONS

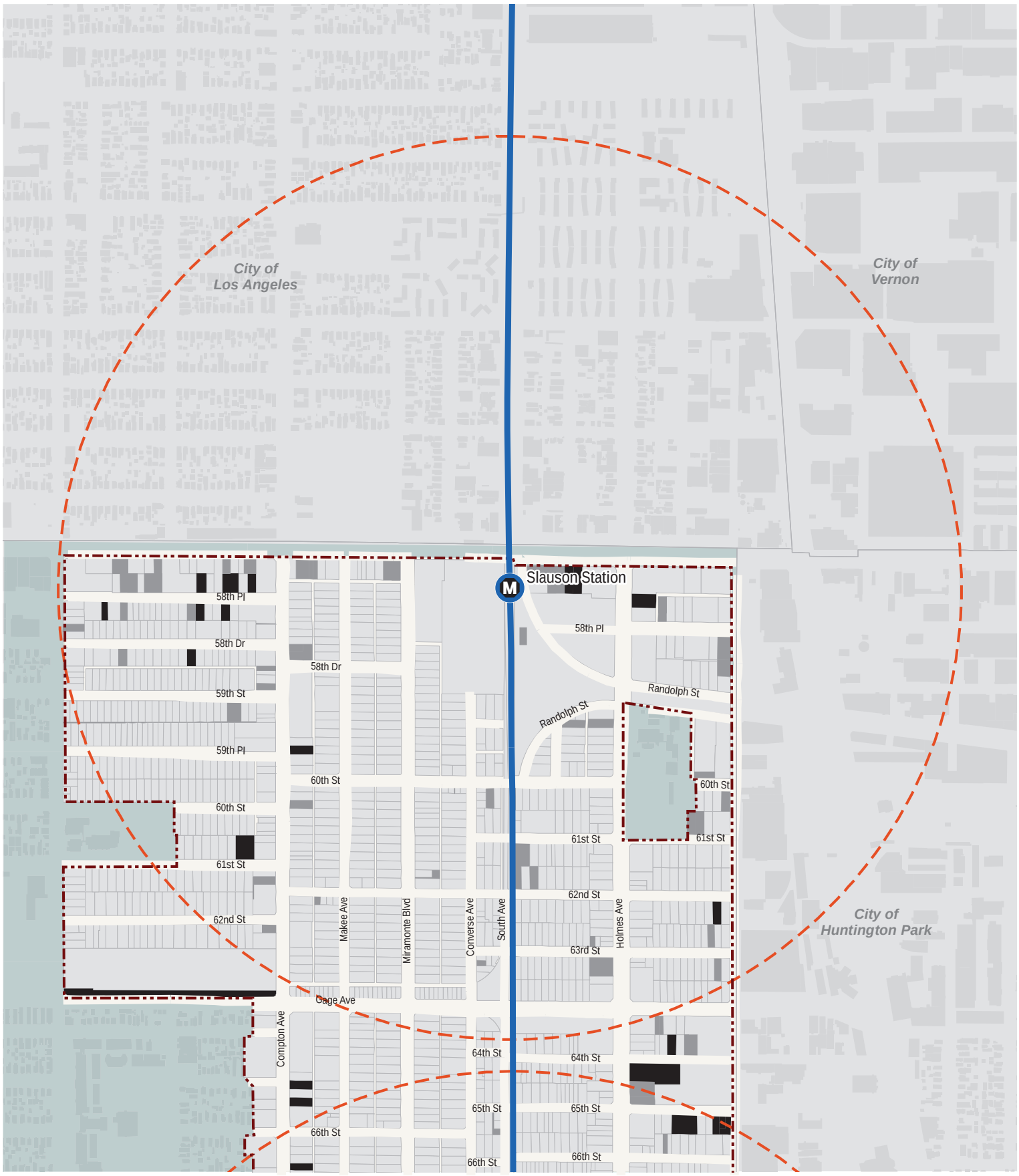
**Findings**

- Vacant and parking lot sizes are generally limited in the Study Area.
- The most common vacant site existing land use is residential, followed by commercial.
- The General Plan land use designation H-18 has the highest number of vacant sites (75), the vast majority of which are designated for residential use (66).
- Residential neighborhoods have congested parking conditions according to residents.

**Recommendations**

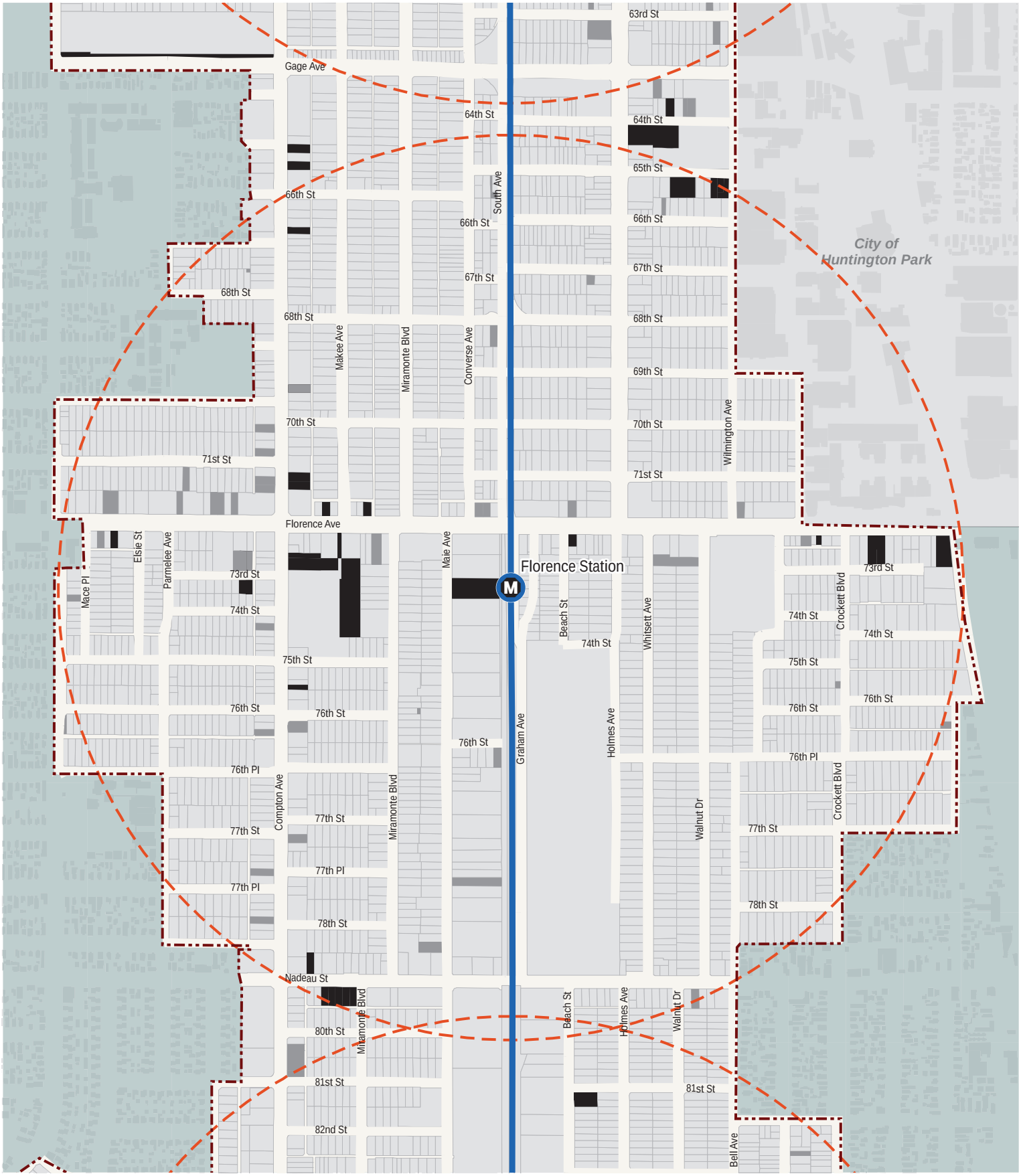
- Parking should be managed as a resource in the Study Area consider adding shared parking resources, smart technologies, and dynamic tools to better manage resource availability, where parking is scarce
- Consider the creation of a parking district strategy to reduce vehicle trips, particularly in new mixed-use development areas.
- Assess parking requirements for permitted uses to determine if right sizing is required, particularly in areas where higher intensity mixed-use is proposed and a 'park-once' strategy is feasible.
- Locate surface parking at the side or rear of buildings and require vehicle access to lots or structures to minimize the impact of parking structures along the street edge.

**Figure 29: Parking and Vacant Sites – Slauson Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 30: Parking and Vacant Sites – Florence Metro A Line (Blue) Station

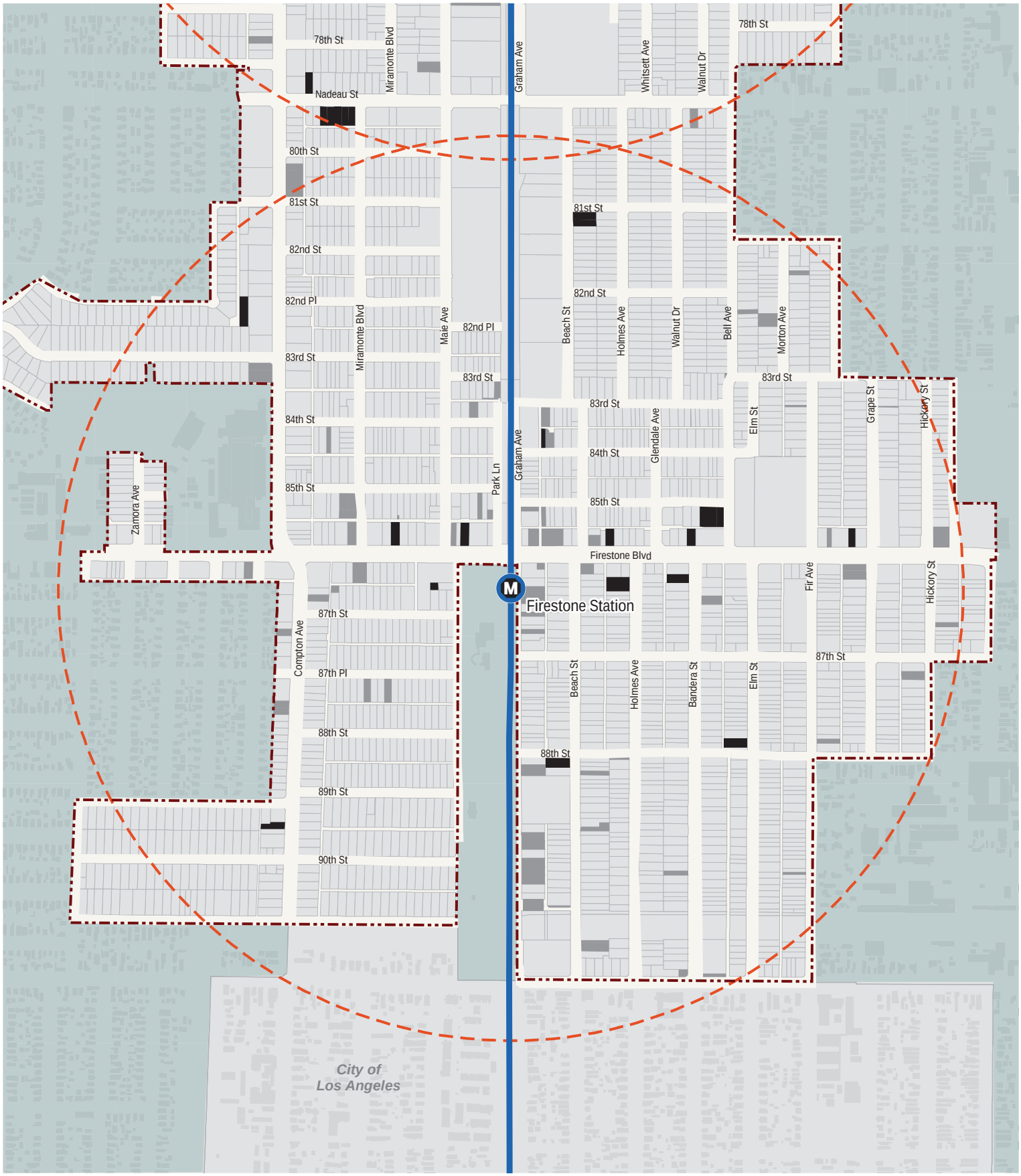



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Surface Parking
Vacant Lot

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 31: Parking and Vacant Sites – Firestone Metro A Line (Blue) Station




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Surface Parking
Vacant Lot

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## 3.1.5 Sidewalks and Streetscape

An enhanced streetscape and public realm network are critical to enhancing connectivity, comfort, and experience for pedestrians. This subsection focuses on existing sidewalk widths and streetscape conditions as an initial assessment of public realm elements for further analysis.

Sidewalks play an important role in the built environment, serving as spaces for pedestrian travel, entryways to buildings, sidewalk dining, and street trees and landscaping, as well as a range of amenities, such as benches, bus shelters, bicycle racks, and trash receptacles. Sufficient sidewalk widths ensure that the sidewalk environment can support all these functional activities. Street trees, as one of the many sidewalk elements, are most successful when planted with enough allocated space to grow, ensuring a healthy tree canopy to provide shade for pedestrians. As shown in **Figure 35**, existing sidewalk widths range but are generally 14 feet along Florence Avenue, 10 feet along Firestone Avenue, and 10 feet along Compton Avenue north of Nadeau Street, narrowing to 8 feet between Nadeau Street and the Study Area boundary, and 12 feet along Miramonte Boulevard. On smaller industrial and some residential neighborhood streets, existing sidewalk widths are generally between 6 and 10 feet. The National Association of Transportation Officials (NACTO) and industry best practices recommend that a sidewalk in a residential area have a clear path of 5 to 6 feet so two people using wheelchairs can comfortably pass each other while retail or mixed-use areas with more pedestrian activity have a clear path of 7 to 14 feet.[3] While sidewalk widths of 10 feet may be sufficient to support the recommended clear path of 5 to 6 feet and pedestrian comfort in low-density residential neighborhoods, sidewalks of less than 12 feet in commercial, mixed-use, or higher-density residential neighborhoods are generally too narrow to support the recommended clear path of 7 to 14 feet in addition to street trees, parkways, and amenities needed to support walkability near transit. A sidewalk width of 15 feet or more is recommended in retail or mixed-use areas where there are higher numbers of pedestrians and more sidewalk activity, like outdoor dining, sidewalk displays, and streetscape furniture, and a clear path of 7 to 14 feet is critical.

While a detailed inventory of trees and street furniture was not assessed, general observations through site visits and Google Streetview show that tree canopy and sidewalk amenities are inconsistent with opportunities for improvement. At the time of the writing of this Community Atlas, no formally adopted streetscape plans governing the public realm are in place within the Study Area. As shown in **Figures 32 through 34**, the streetscape and public realm visual character, features, and conditions vary across the Study Area. For example, along residential neighborhood streets, such as Miramonte Boulevard 12-foot sidewalks with landscaped parkways can be found. Along Florence Avenue, streetscape improvements include a center landscaped median; 14-foot sidewalks; and sidewalk amenities, such as benches, pedestrian lighting, trash receptacles, and street trees. Curb extensions are also located on Florence Avenue; one example at Hooper Avenue.. Along commercial streets throughout the Study Area, except for Florence Avenue, sidewalk widths are generally narrow and space constrained, with some large ficus trees and other street tree species.

### 3.1.5.1 Tree Canopy

Urban trees play an important role in keeping communities livable, sustainable, and resilient. Trees improve air quality, increase urban biodiversity, and help reduce carbon emissions[4] as

[3] National Association of Transportation Officials (NACTO) Global Designing Cities Initiative, Sidewalks Design Guidance. Accessed here: https://globaldesigningcities.org/publication/global-street-design-guide/designing-streets-people/designing-for-pedestrians/sidewalks/design-guidance/

[4] Food and Agriculture Organization of the United Nations (2016) Building greener cities: nine benefits of urban trees. Accessed from: http://www.fao.org/zhc/detail-events/en/c/454543/

well bring health, social, economic, and aesthetic benefits to communities. As temperatures continue to rise, trees can enhance the comfort of people walking by providing shade canopy to help reduce the urban heat island effect and decrease sidewalk temperatures. The Study Area is considered a "heat-vulnerable" area within Los Angeles County according to a recent Tree People report,[5] which shows that the burden of heat vulnerability is focused in lower-income, more densely populated communities.

Street trees are mentioned throughout the FFCP for the purposes of encouraging beautification, identity, and energy efficient building, as well as increasing shade and creating an inviting walking environment. A street tree plan is listed as one component of a larger streetscape program action item to create a uniform shade canopy. The FFCP specifically identified the following locations as in need of street trees, landscaping, sidewalk improvements, and lighting:

- Nadeau Street,
- Slauson Avenue,
- Graham Avenue,
- Firestone Boulevard,
- industrial zones in general

In addition, bus stop beautification is included in the FFCP, with street trees being one element among others.

To better understand the existing tree canopy in the Study Area, a County of Los Angeles tree canopy raster dataset6 based on LIDAR data was used to map tree canopy, shown in **Figures 36** through **39**. In line with the recommendations in the FFCP, tree canopy is limited on the major roads in the Study Area, including:

- Slauson Avenue,
- Florence Avenue,
- Firestone Boulevard,
- Nadeau Street, and
- Compton Boulevard.

Notably, Whitsett Avenue and Walnut Drive between Florence Avenue and Nadeau Street, a residential area, have comparably more consistent tree canopy coverage. Industrial areas, such as those bordering the Metro right-of-way and to the east of the Metro Slauson Station, are lacking tree canopy.

[5] Tree People and Los Angeles Urban Cooling Collaborative (2020) Rx for Hot Cities: Climate Resilience through Urban Greening and Cooling in Los Angeles. Access from: https://www.treepeople.org/sites/default/files/pdf/publications/Rx%20for%20Hot%20Cities_Project%20Report.pdf

[6] For details on the multi-step process to develop the tree canopy data, see Los Angeles County GIS Data Portal, https://egis3.lacounty.gov/dataportal/2010/12/23/tree-canopy-raster-2006-data/

**Figure 32: Visual Street Character and Public Realm Conditions - Residential**

Residential street with approx. 4 ft. sidewalk and landscaped parkway | Source: A Paseo Through Time in Florence-Firestone



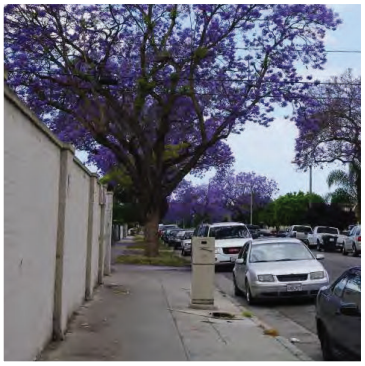
Residential street with approx. 5 ft sidewalk, landscaped parkway and street trees



Residential street with approx. 6 ft sidewalk and landscaped parkway



Residential street with approx. 12 ft sidewalk with no parkway



Residential street with approx. 4 ft sidewalk and landscaped parkway



**Figure 33: Visual Street Character and Public Realm Conditions - Commercial**

Compton Boulevard and Florence Avenue commercial street with approx. 10 ft. sidewalk




Compton Boulevard commercial street with approx. 14 ft. sidewalk




Commercial street with 8 ft. sidewalk and no parkway




Florence Avenue commercial street with approx. 14 ft. sidewalk, street trees and seating



Florence Avenue commercial street with 14 ft. sidewalk adjacent to the transit station



**Figure 34: Visual Street Character and Public Realm Conditions - Industrial**

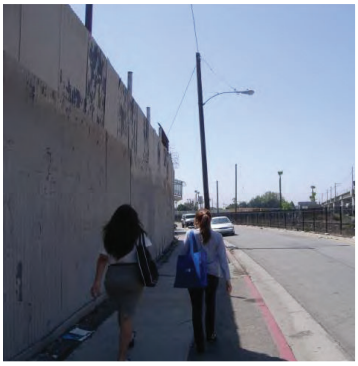
Industrial street with approx. 5 ft. sidewalk and utilities that conflict with clear walking path




Industrial street with approx. 8 ft. sidewalk and utilities that conflict with clear walking path



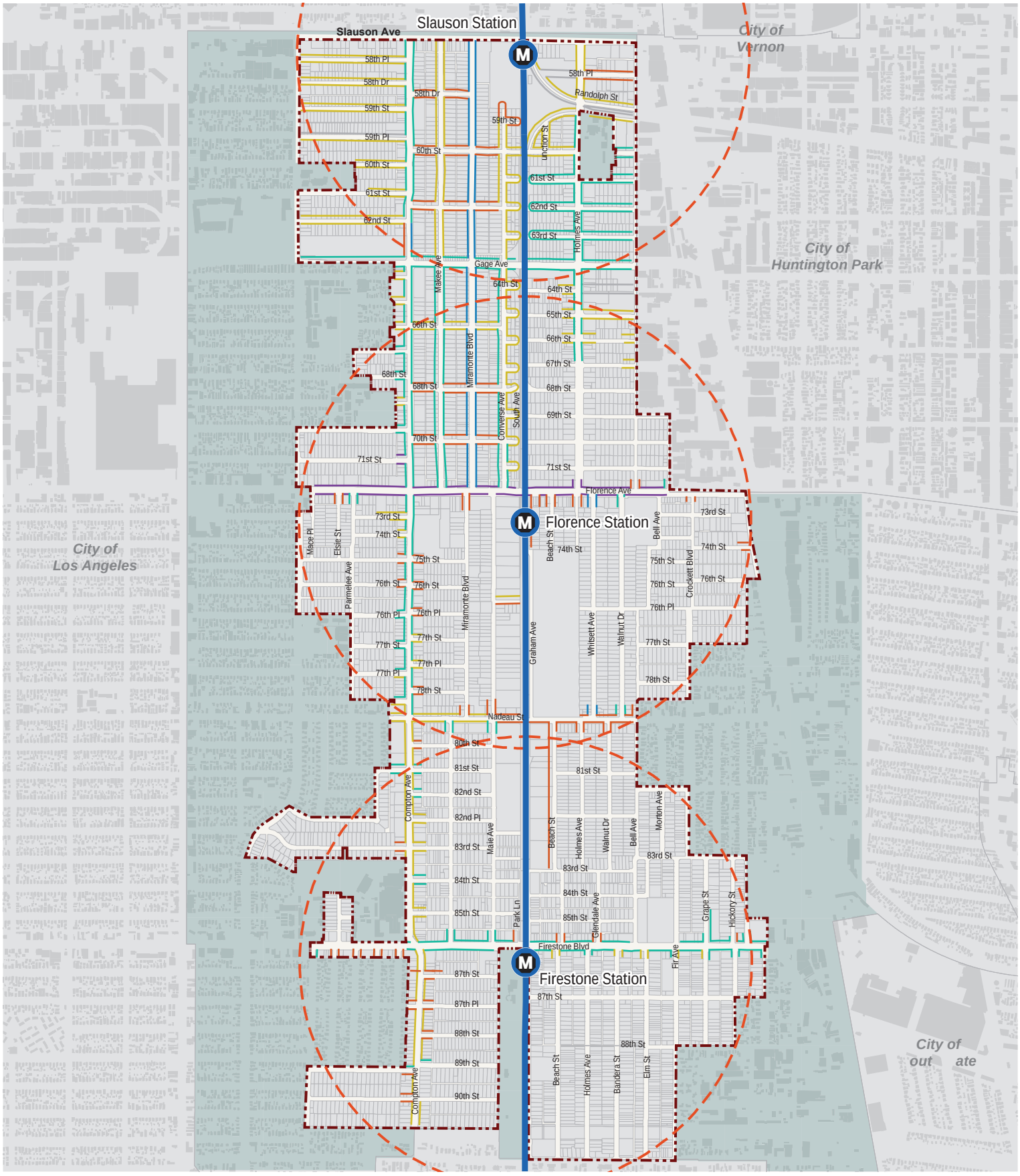
Industrial street adjacent to the Slauson Station with approx. 8 ft sidewalk



Industrial street with approx. 8 ft. sidewalk sidewalk and utilities that conflict with clear walking path



**Figure 35: Existing Sidewalk Widths**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Assessor Parcel
Metro Station
Metro A Line (Blue)

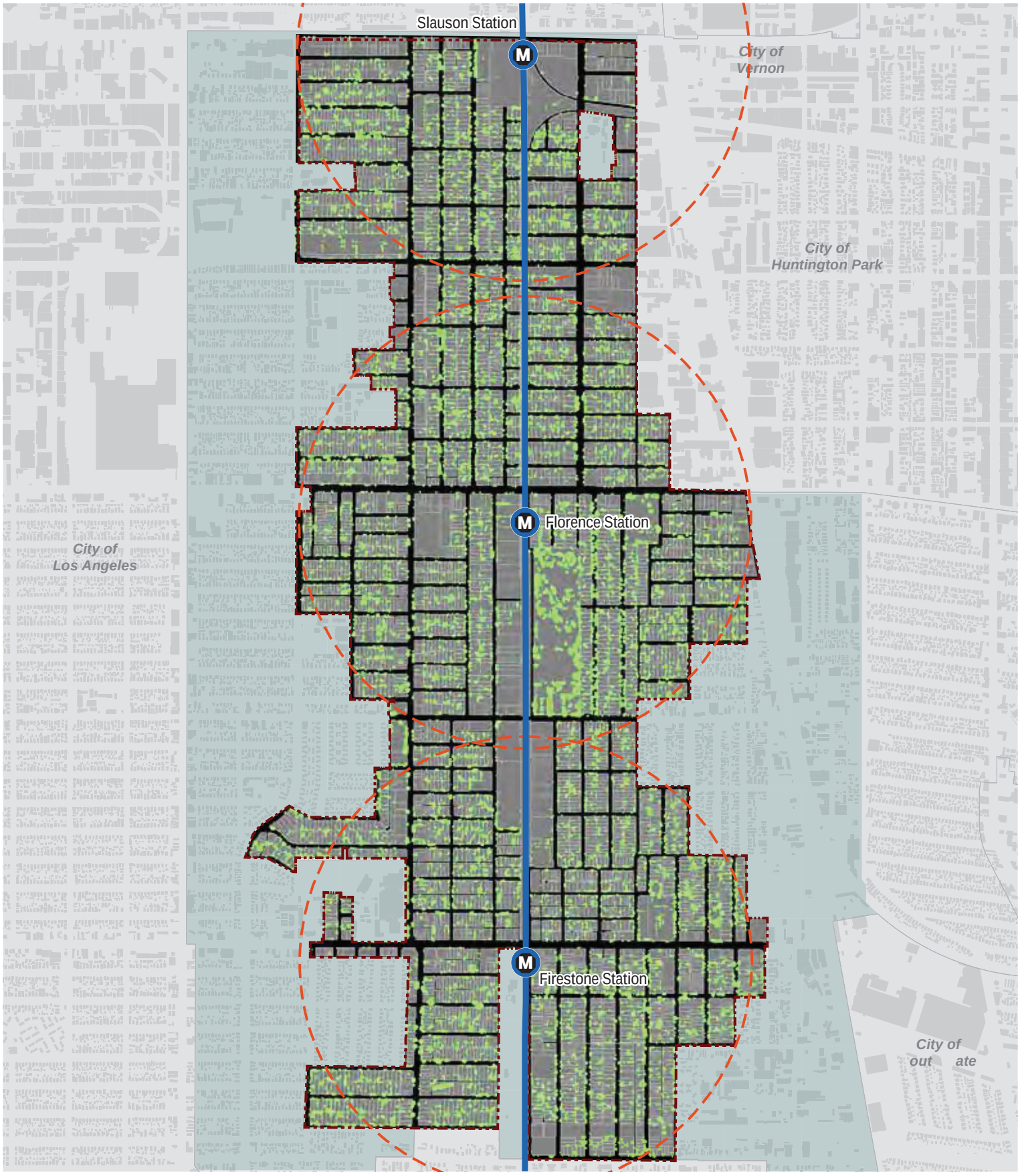
**Existing Sidewalk Widths**

- No sidewalk
- 6 ft
- 8 ft
- 10 ft
- 12 ft
- 14 ft

Feet
0 750 1,500

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 36: Tree Canopy**

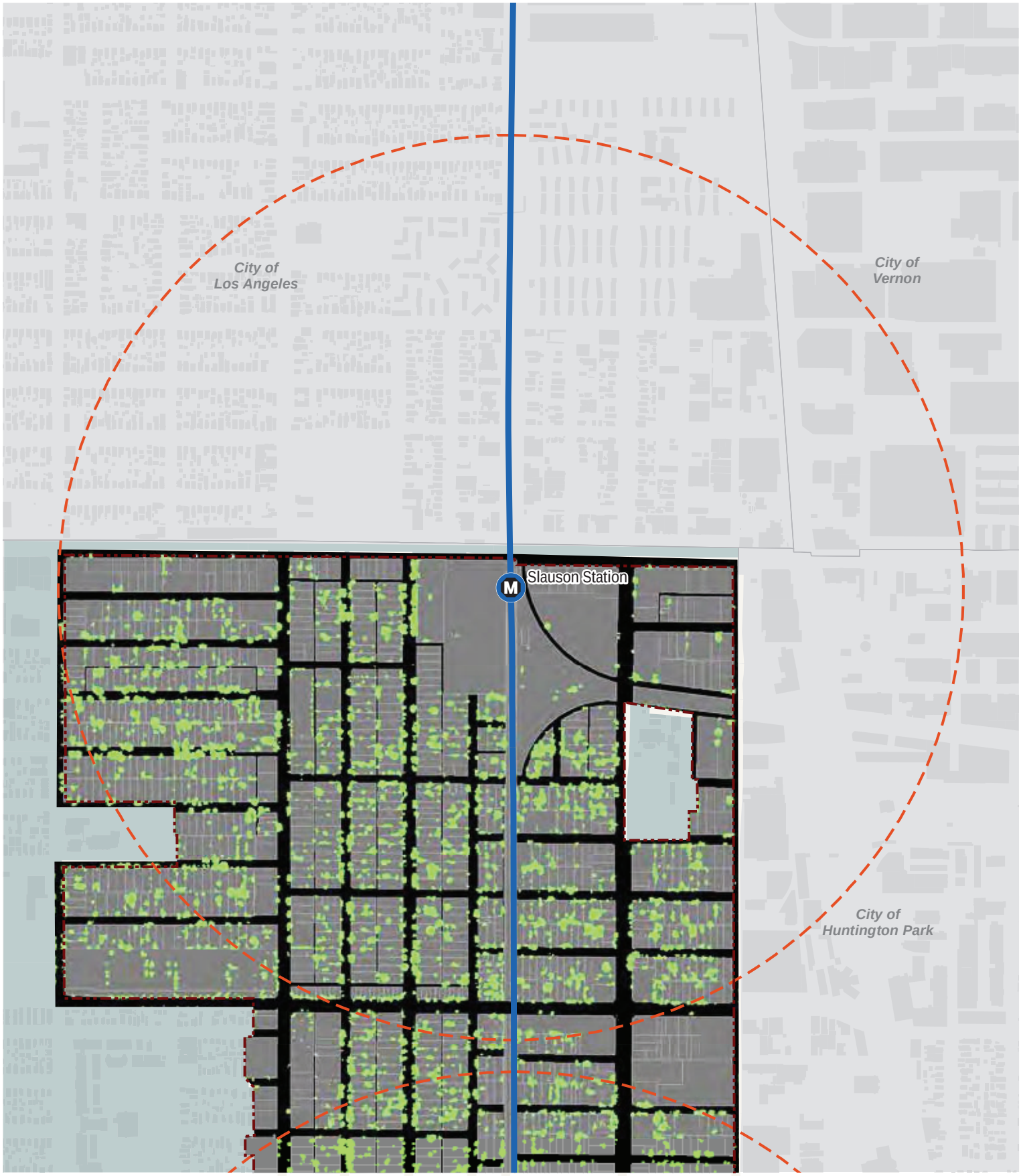



Study Area
Florence-Firestone
1/2 mile TOD Radius
Assessor Parcel
Metro Station
Metro A Line (Blue)
Tree Canopy

0 750 1,500 Feet

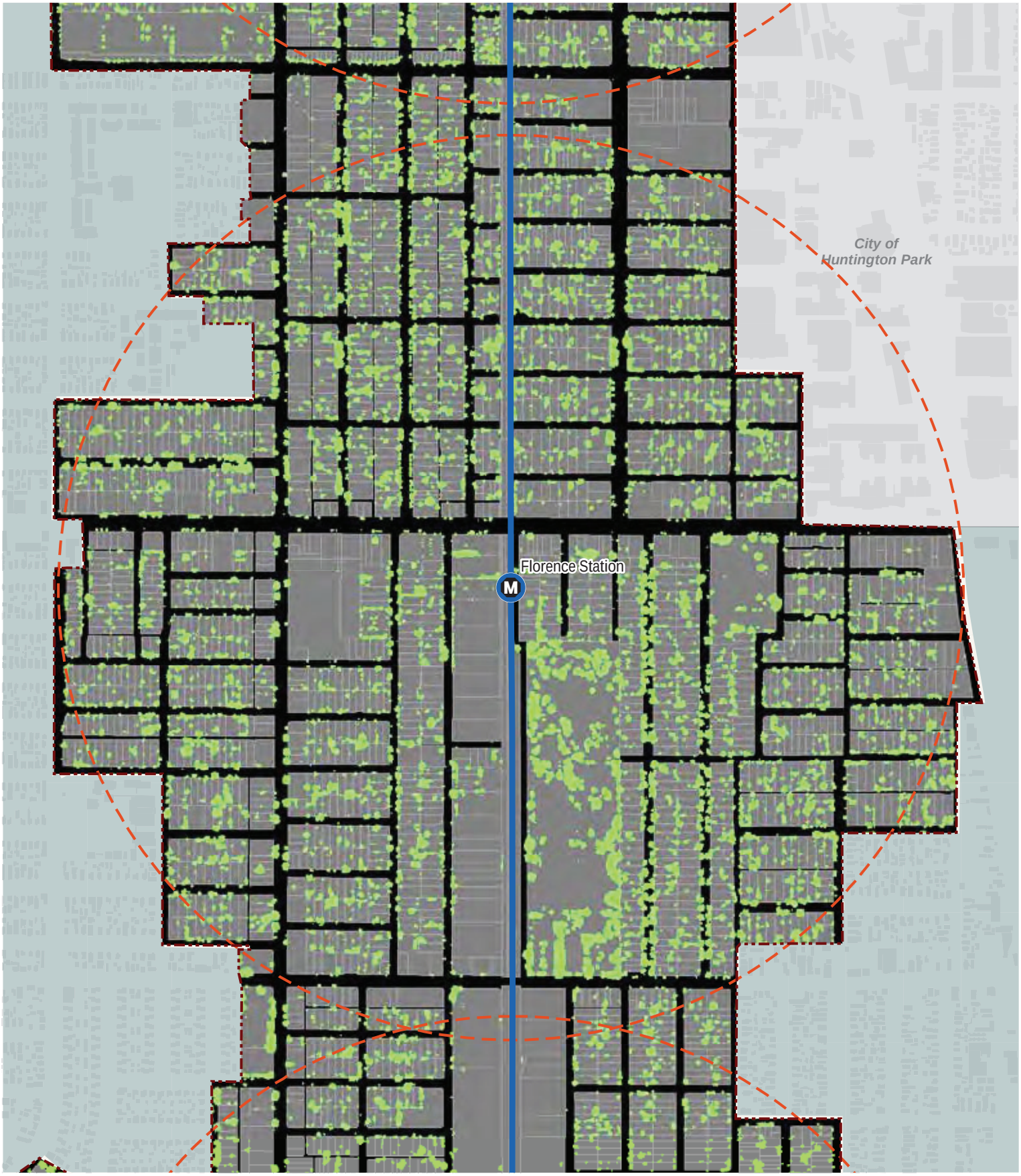
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 37: Tree Canopy – Slauson Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 38: Tree Canopy – Florence Metro A Line (Blue) Station**

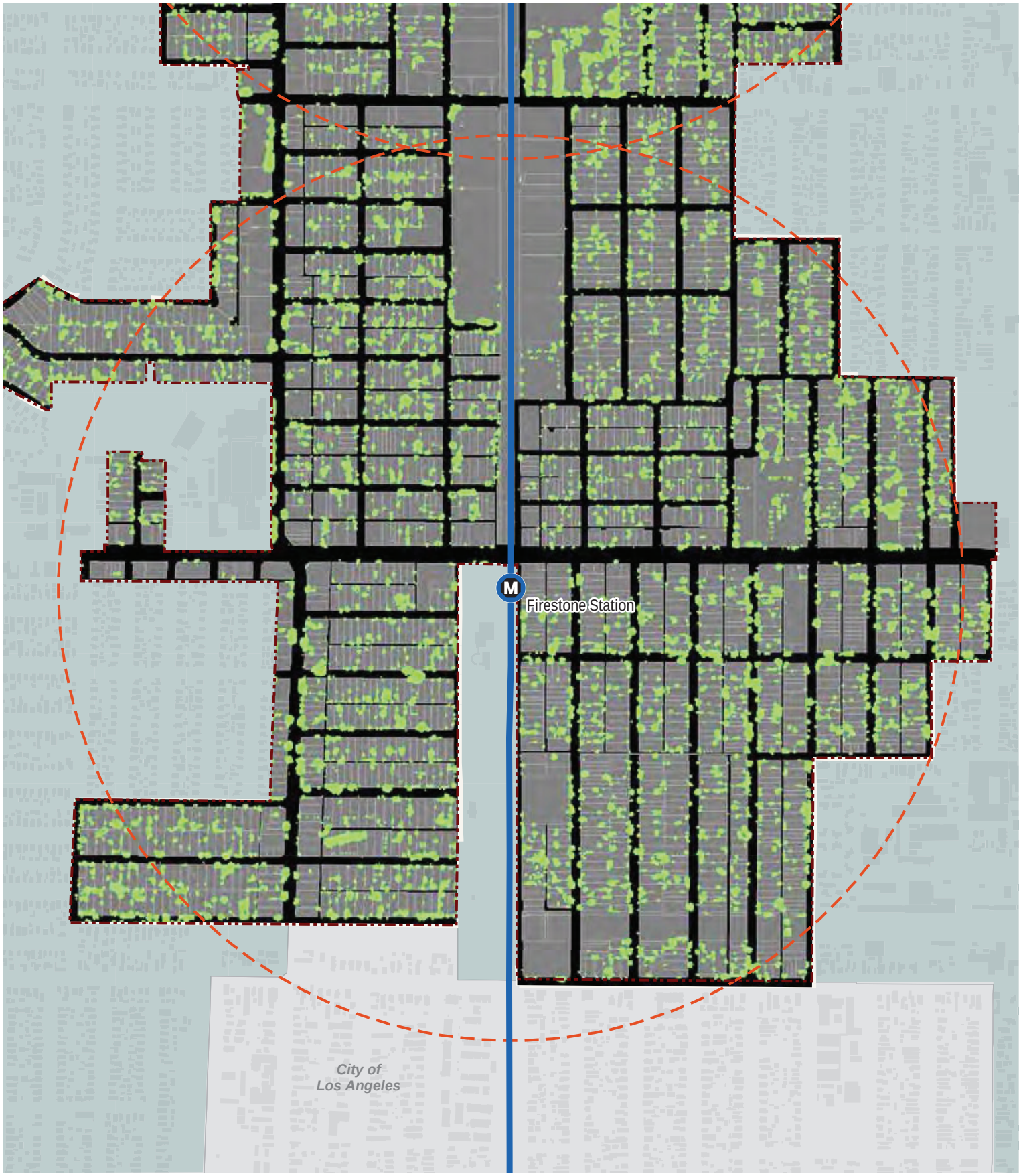



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Tree Canopy

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 39: Tree Canopy – Firestone Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## 3.1.6 Building Figure Ground

Figure ground maps (**Figure 40** through **Figure 42**) illustrate urban form by showing the size and placement of buildings within a parcel and the patterns of the building fabric as they relate to the public realm, to each other, and in some cases neighboring context.

Along the commercial corridor of Compton Avenue is a fairly unified street wall pattern. This means the majority of buildings have a uniform condition with the front wall located at the back of the right-of-way, with little or no setbacks. However, there are interruptions in the street wall for parking, fenced outdoor storage or industrial activities, and pockets of residential homes with greater setbacks. This creates an inconsistent pattern, which is generally discouraged along commercial corridors. However, along Compton Avenue, the pattern has resulted a character of variation that seems unique, and contributes, to the community character of Florence-Firestone.

Florence Avenue is dominated by large footprint buildings built to the sidewalk, with little or no setbacks. This creates a more walkable condition between Compton Avenue and the Florence Metro Blue Line Station. The pattern and size of the buildings become more varied west of Compton Avenue and to east of the station with smaller buildings in a variety of setback conditions.

Gage Avenue is a unique condition, with a mix of auto-oriented commercial (northwest corner of Compton Avenue and Gage Avenue). This pattern transitions into row homes facing the street (but separated by a block wall from the street) east of Compton Avenue, and then transitions again east of Converse Avenue to street-oriented commercial uses. This varied figure ground pattern makes it challenging to establish a defined “character” that could be used to unify Gage Avenue

Industrial areas near Slauson Avenue and east of the Slauson Metro A Line (Blue) Station identify large existing buildings with a predominantly street-front orientation and open lot area in the rear. There is also a relatively high number of parcels in the areas with no buildings which indicates open storage or parking uses indicates open storage or parking uses.

### FINDINGS + RECOMMENDATIONS

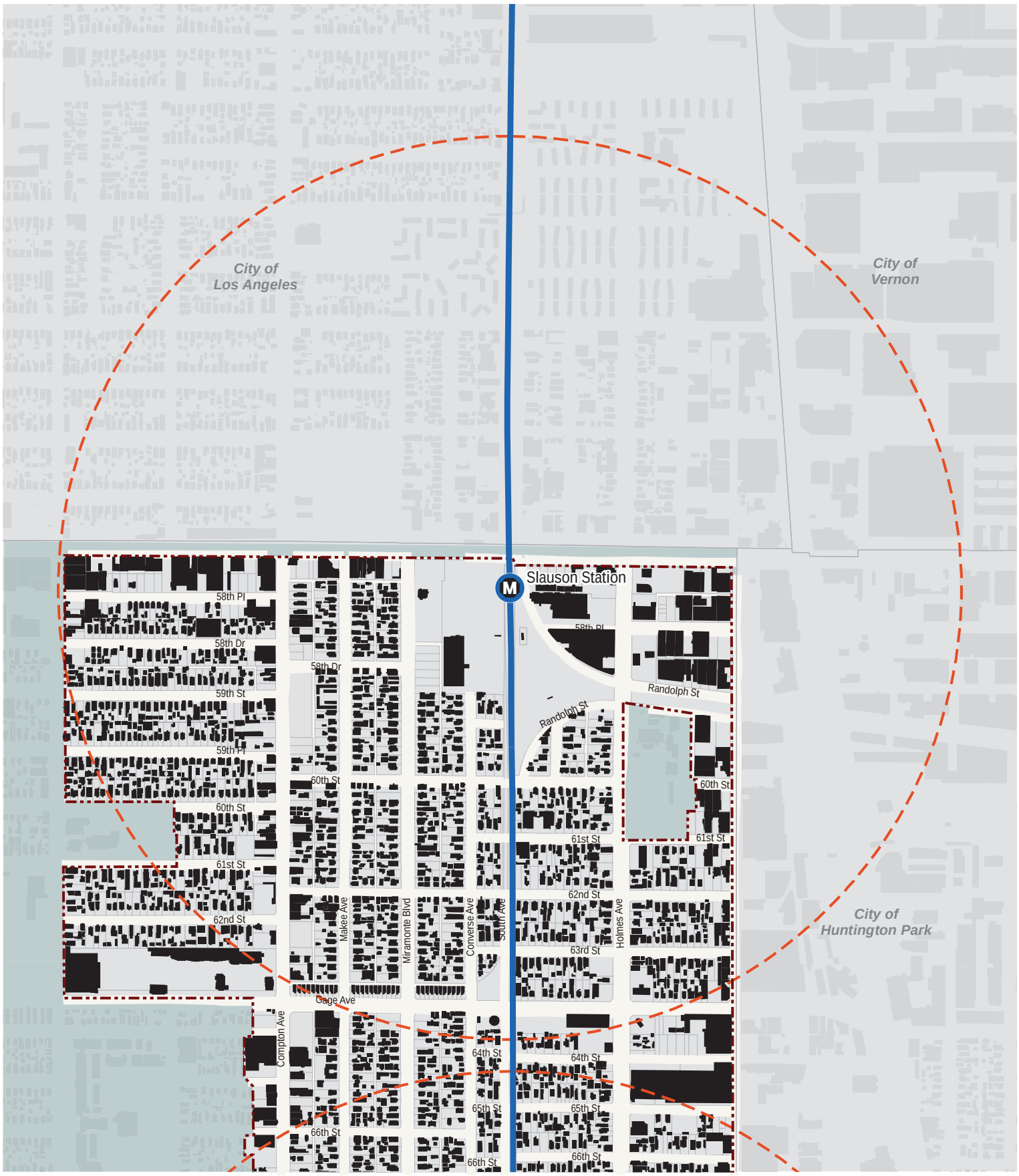
**Findings**

- Building patterns and building locations along the commercial corridors are varied; the variety of uses present and lack of building standards require specific building placement.
- Development patterns in the residential areas are highly consistent with similar building types, block lengths, and parcel depths.
- Sites without buildings indicate either public sites (schools, etc.) or underutilization that could be opportunities for catalytic infill.

**Recommendations**

- Discuss the ‘character’ of key streets such as Compton Avenue and Florence Avenue to determine if ridged street-front setback is appropriate or if the variation along the corridor supports an identity that makes the Florence-Firestone community unique.
- Evaluate the utilization of industrial sites to identify key locations for adaptive reuse or transition to less-intensive uses.

**Figure 40: Building Figure Ground – Slauson Metro A Line (Blue) Station**

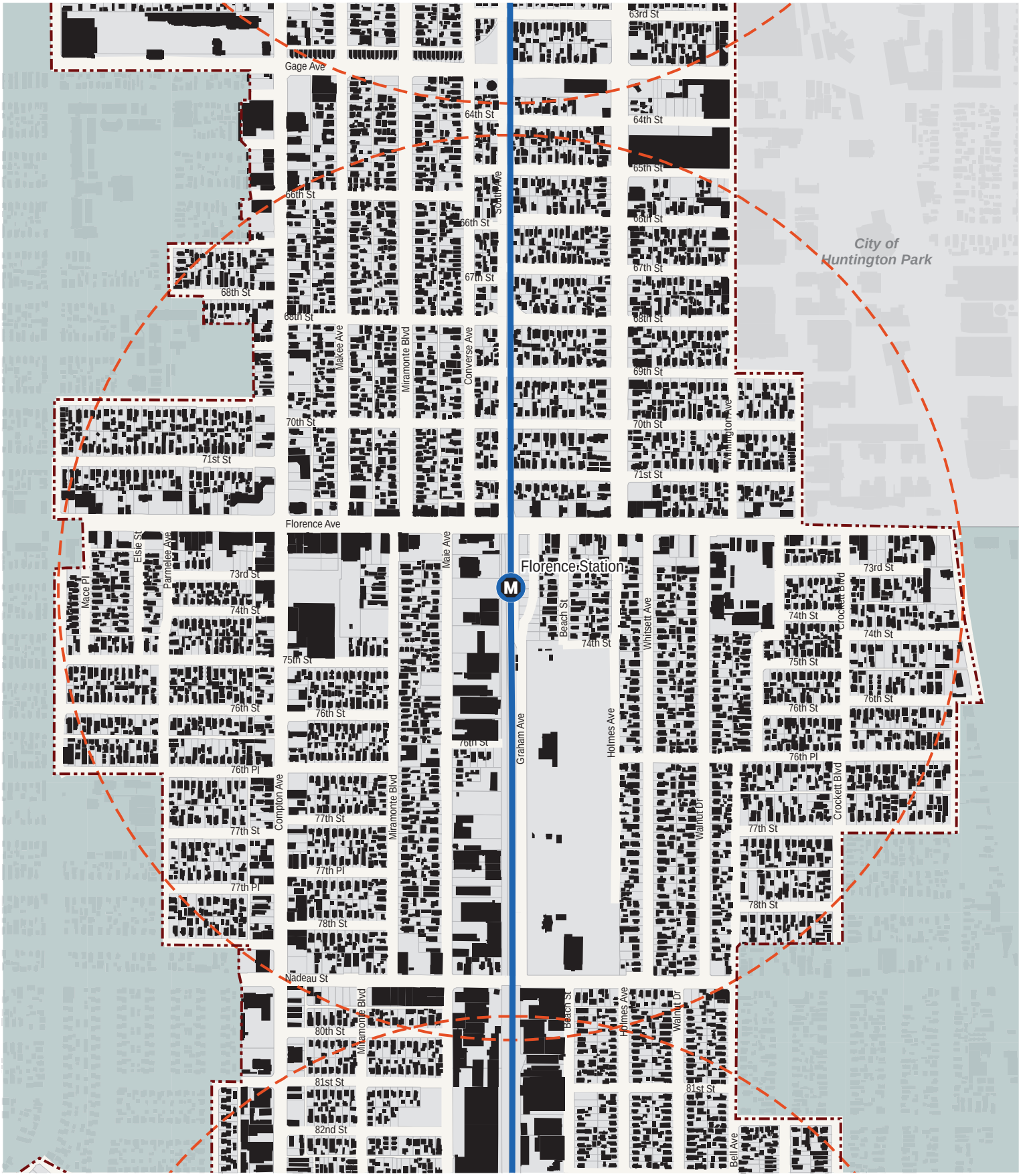



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Building Footprint

0 375 750 Feet

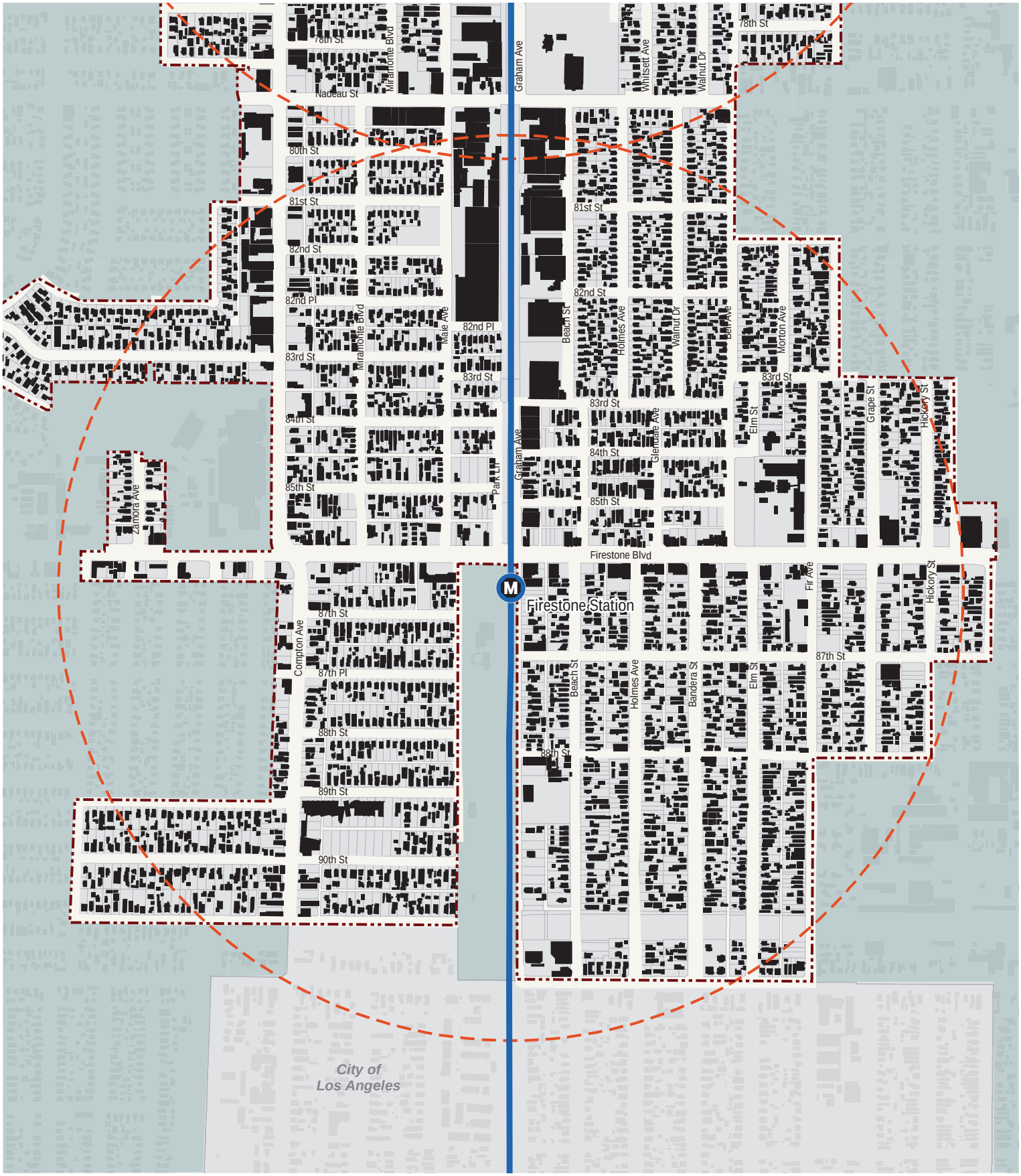
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 41: Building Figure Ground – Florence Metro A Line (Blue) Station**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 42: Building Figure Ground – Firestone Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Building Footprint

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## 3.1.7 Building Type and Age

Building types and ages vary throughout the Study Area. As shown in **Figure 43,** as well as **Figure 44** through **Figure 46**, buildings built prior to 1941 are common throughout the Study Area (approximately 68%), followed by buildings built between 1942 and 1969 (approximately 20%). Predominately older buildings in the Study Area signify both opportunities for redevelopment of older, underutilized buildings or protection through historic designation. More recent buildings built between 2001 and today are very few, with a notable cluster along Gage Avenue to the east and west of Compton Avenue consisting of a commercial strip mall with a variety of offices, retail, and restaurants, and a grouping of townhomes with outdoor patios and individual entrances via Gage Avenue, shown in **Figure 47**.

**Figure 43: Building Age of Properties in the Study Area**

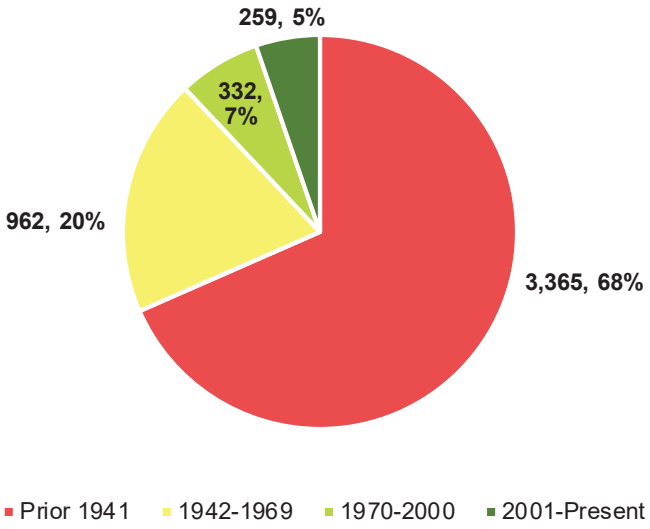



**Figure 47** provides a visual assessment of predominant or interesting building types in the community as a rubric for assessing scale and type of recommended development. See Section 3.2.2 Historic Resources for a more detailed summary of architectural styles and historic designation potential in the Study Area.

## FINDINGS + RECOMMENDATIONS

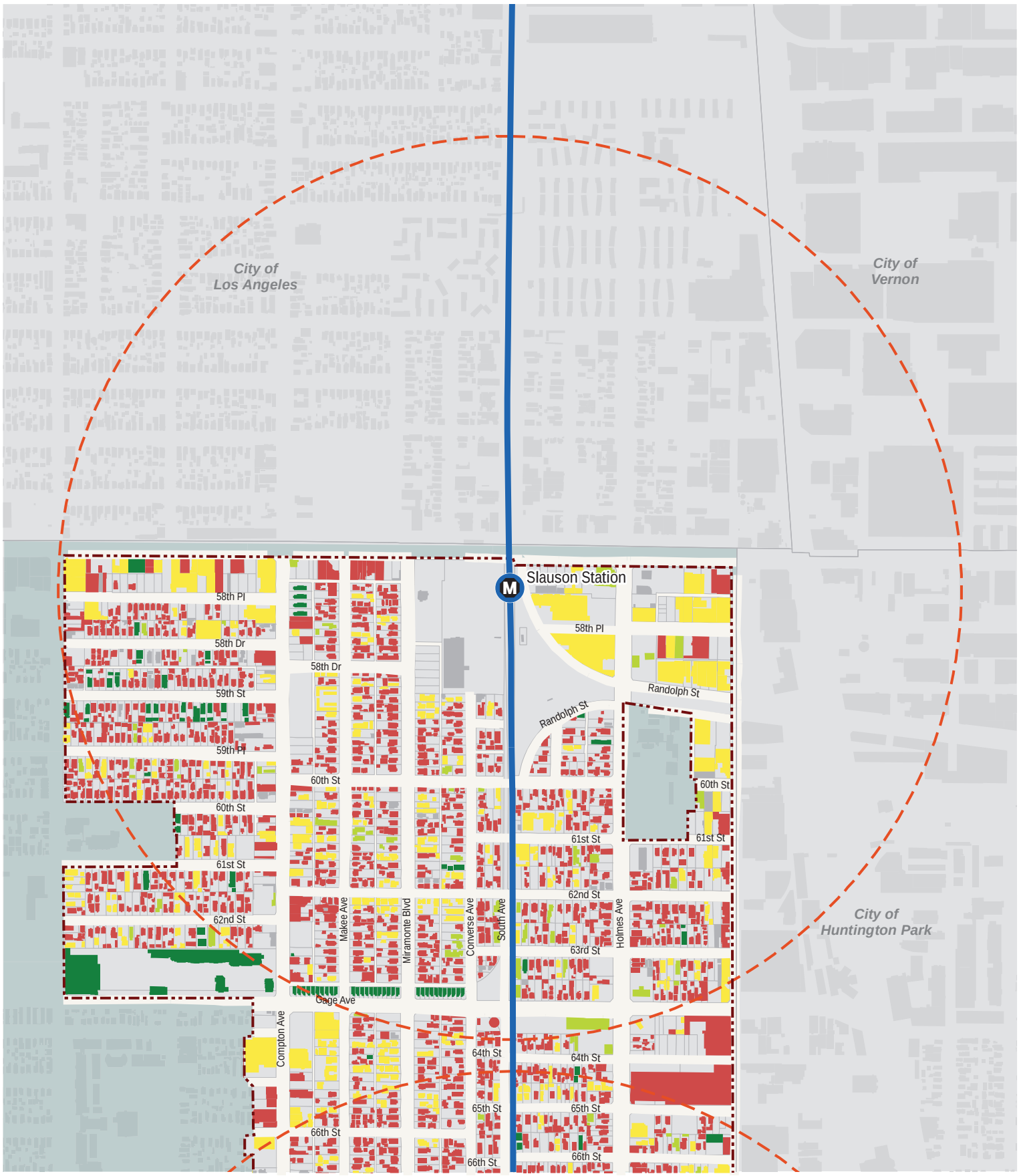
### Findings

- The majority of buildings within the Study Area were built prior to 1941 followed by between 1942 and 1969.
- Building types vary throughout the Study Area, ranging from single-story industrial buildings with blank frontages, to two-story commercial buildings within a walkable corridor environment, to two-story newly constructed townhomes.

### Recommendations

- Predominately older buildings in the Study Area signify both opportunities for redevelopment of older underutilized buildings or protection through historic designation, which is the focus of Section 3.2.2 Historic Resources.
- Explore opportunities to develop specific programs or strategies to help property owners retrofit and/or redevelop older properties within the Study Area.

**Figure 44: Building Age – Slauson Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel

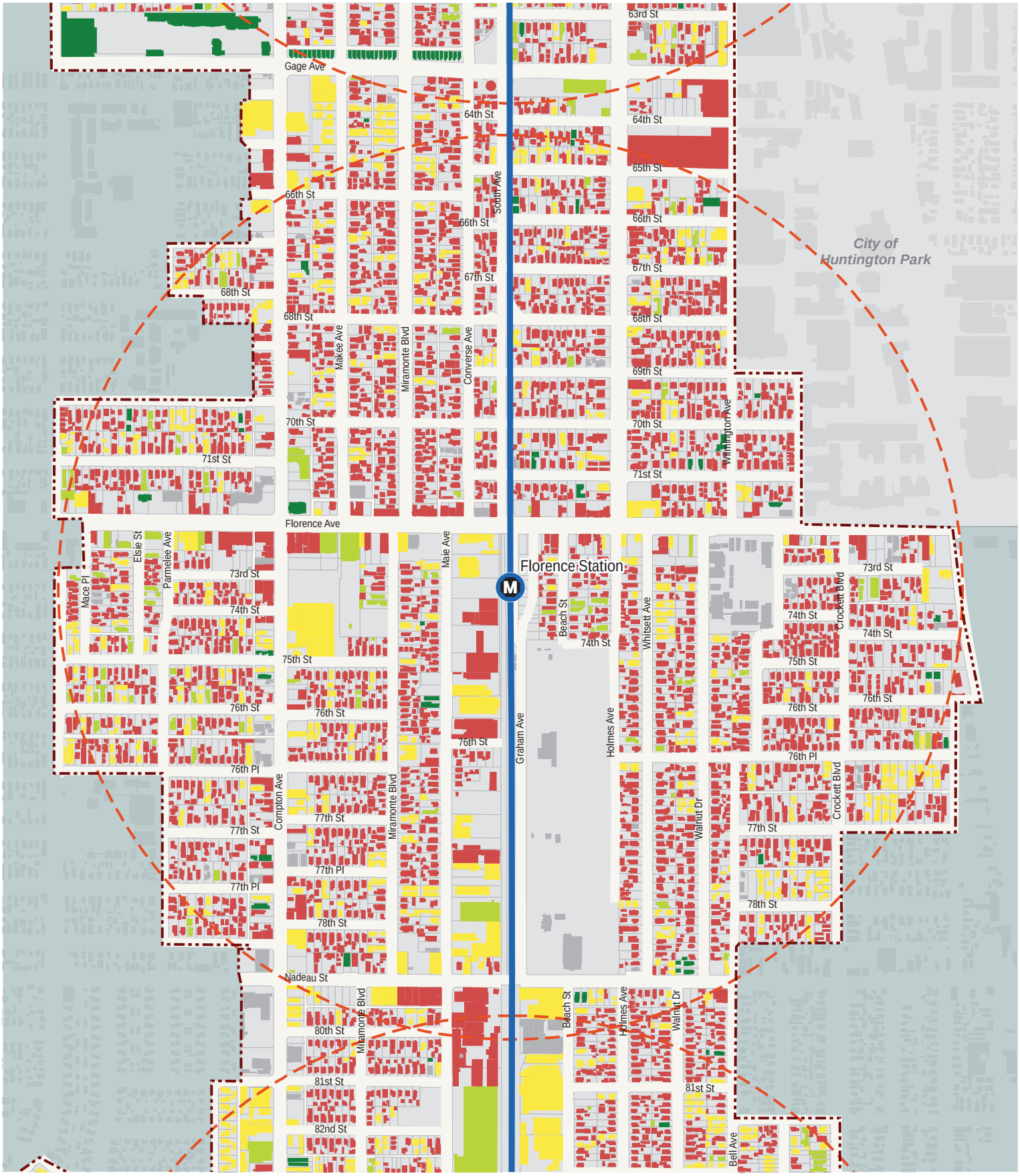
**Year Built**

No Data
Prior to 1941
1942 - 1969
1970 - 2000
2001 - Present

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 45: Building Age – Florence Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel

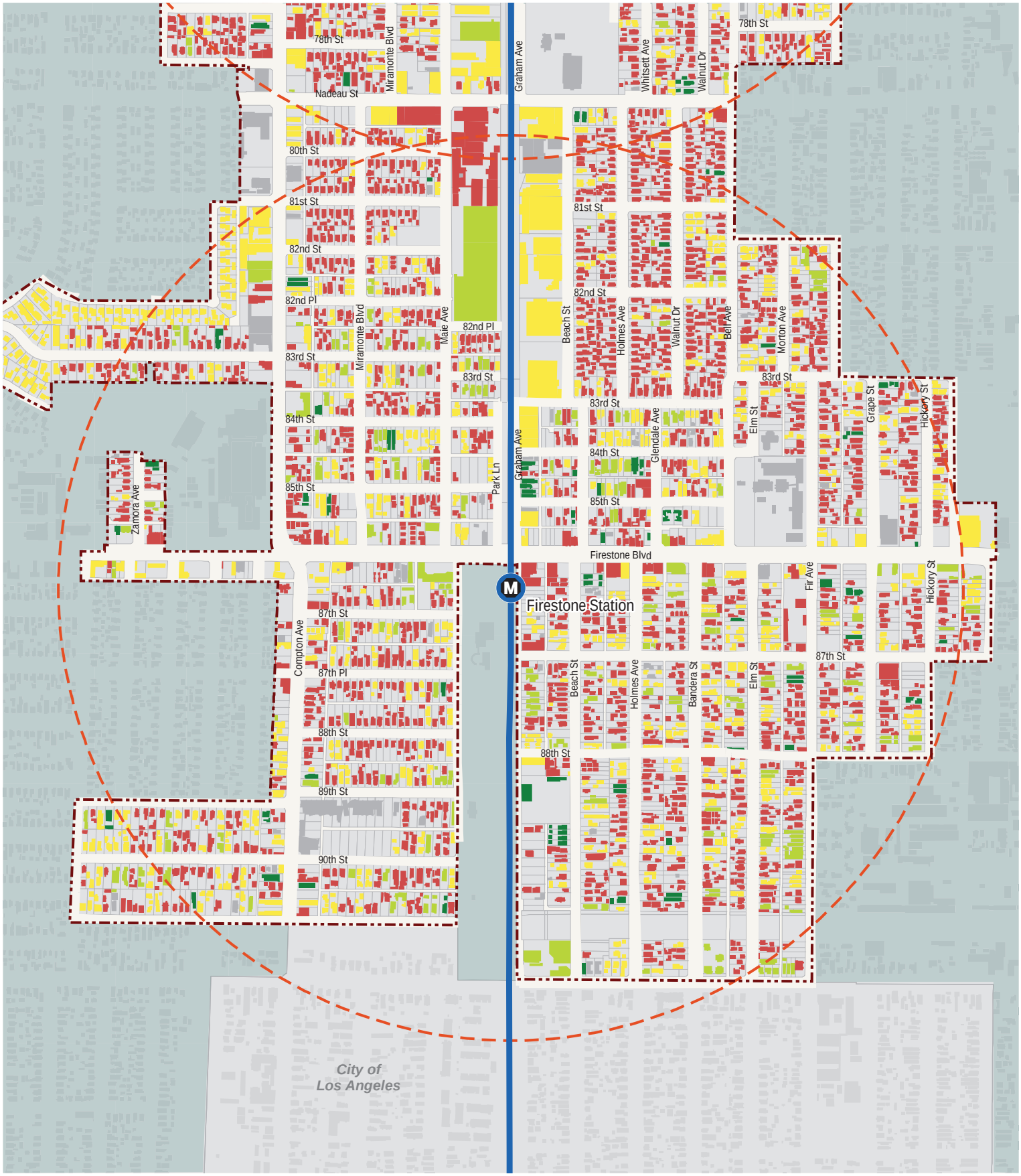
**Year Built**

No Data
Prior to 1941
1942 - 1969
1970 - 2000
2001 - Present

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 46: Building Age – Firestone Metro A Line (Blue) Station**




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel

**Year Built**

No Data
Prior to 1941
1942 - 1969
1970 - 2000
2001 - Present

Feet
0 375 750

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 47: Building Context: Building Types and Character**

One Story Industrial



One Story Strip Mall



Florence Avenue Walkable Commercial Corridor



Florence Avenue walkable commercial corridor




1503 E. Gage Avenue, cluster of two story townhomes with indivdual patios and entrances via Gage Avenue at Compton Avenue, as well as landscaped setbacks, built between 2001 and present | Source: Realtor.com



# 3.2 Civic Arts

This section provides an overview of civic and cultural resources in the Study Area, focusing on places and objects of civic, cultural, and potentially historical significance to be further discussed and explored with the Florence-Firestone community. A virtual survey of historic resources is included in this section to identify potential buildings and districts with historic significance; the extent of this study will be expanded to include all residential properties within the Study Area. Together, civic, cultural, and historical resources help form community identity and a sense of place, which is included in the FFCP as a policy directive for further development.

## 3.2.1 Civic and Cultural Resources

Civic and cultural resources are located throughout the Study Area, constituting community-based facilities, public parks, community public art, and civic art. The Former Sheriff's Building, now the Youth Activities League, is specifically mentioned in the FFCP as an important civic and cultural resource and is therefore shown as a community-identified resource in **Figure 48** through **Figure 50**, along with a variety of other elements. These foundational maps are intended to be reviewed by the Florence-Firestone community and expanded upon in consultation with the outreach program to ensure resources of value to community members are identified. As mentioned in the FFCP, the Gabrielino-Tongva Tribe is part of Florence-Firestone early history and considered an additional important cultural resource.

**Parks and Green Space**

Green spaces and parks are limited in the Study Area. Roosevelt Park along Graham Avenue, between Holmes Avenue and Nadeau Street, is the only large-scale community park space. While Roosevelt Park is a large 24.35-acre regional park with a variety of amenities, the Study Area lacks more frequent, local spaces, such as pocket parks, for community enjoyment and recreation. As previously mentioned in Section 3.1.1 Block Patterns and Alleys, the Study Area is identified as a "very high" park need community by the Los Angeles County Park Needs Assessment.

The Park Needs Assessment identifies vacant sites, public lands, and alleys as part of a new type of solution to provide parks in high need areas. An example of a transformational park in the Florence-Firestone community is the grant awarded 92nd Street Linear Park Development project, which will be a 5.5-acre park in the Study Area within a site that is a portion of the underdeveloped corridor owned by the LADWP.[7] While vacant sites are not common within the Study Area, there are a large number of alleys that could provide a creative solution to address multiple issues in the Florence-Firestone community. However, as mentioned in Section 3.1.1, some alleys in the Study Area, according to the FFCP, cause public safety concern because of illegal dumping, graffiti, and crime. Therefore, strategic locations for alley conversion to "green alleys" for additional green space and locations for community gathering and recreation should be identified where opportunity exists to connect to/from the Metro stations as well as locations where there is a clustering of residents to encourage utilization. Safety enhancements, such as pedestrian lighting through new development adjacent to existing alleys, can help to increase pedestrian comfort and safety.

[7] Los Angeles County Department of Parks and Recreation, Press Release: 21 Million in Grants Awarded for New Parks in Communities with High Park Need. Accessed from: https://parks.lacounty.gov/newsrelease-prop68grants2019/

## FINDINGS + RECOMMENDATIONS

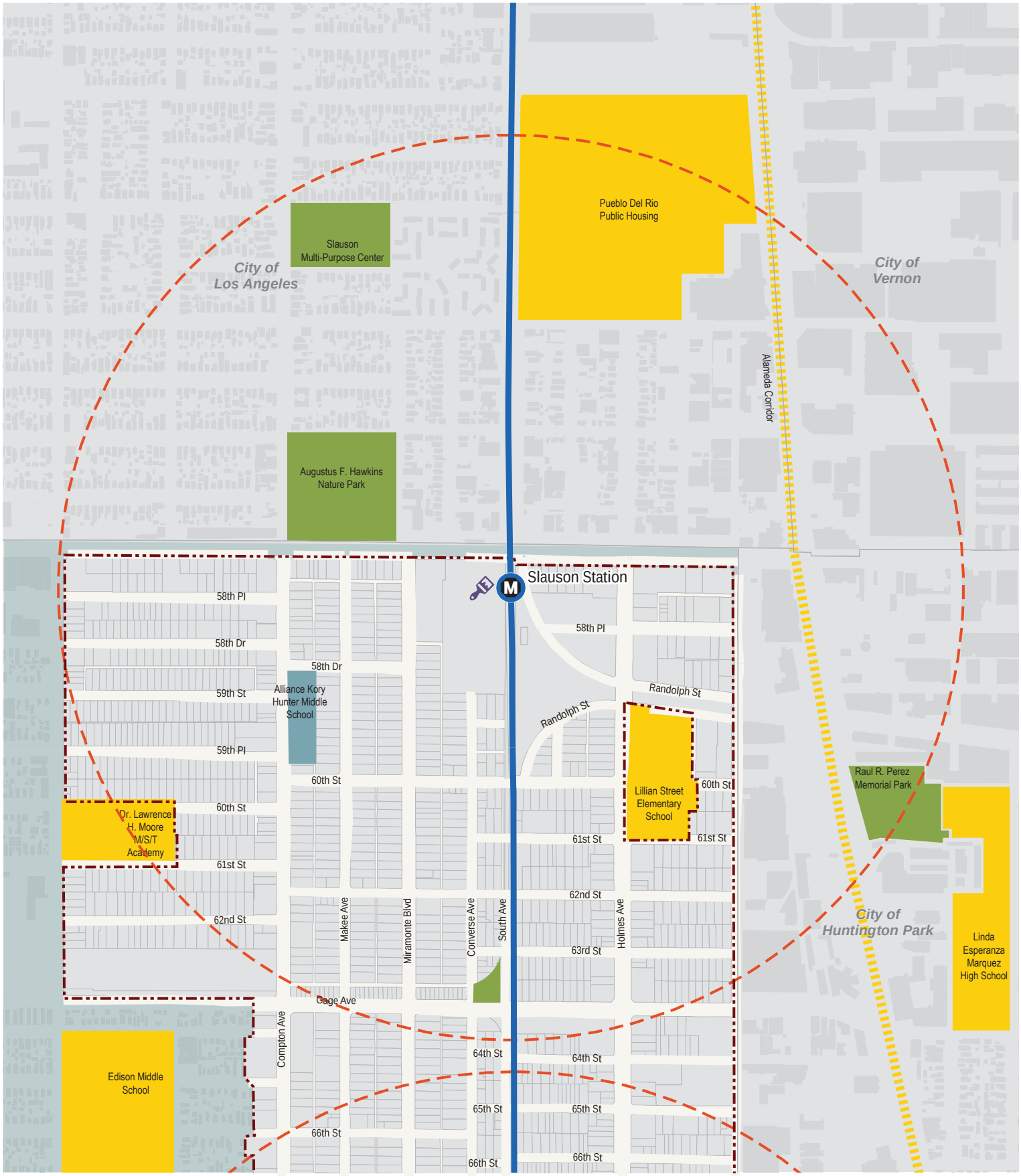
### Findings

- Green spaces and parks are primarily located just outside of the Study Area, except for Roosevelt Park.
- The community has been identified by the Parks Needs Assessment as requiring more parks and green space; the standards of the CSD for the community emphasize incorporation of more parks and green spaces.
- An example of a transformational park project in the Study Area is the grant awarded 92nd Street Linear Park Development project, a 5.5-acre park in the Study Area within a site that is a portion of the underdeveloped corridor owned by LADWP.

### Recommendations

- Provide opportunities for community members' input to shape the conclusions of this section to voice feedback on what is of value to the Florence-Firestone community.
- Identify opportunities for a civic art program to promote an overall sense of place and community identity.
- Explore creation and incentivization of "Green Alleys" and other supplemental green space options for incorporation in new development.
- Identify opportunities for conversion of select existing alleys to green spaces or multi-use path networks for walking and biking given the large presence of alleys and the "very high" park need identified in this community. Candidate alley conversions can be identified where opportunity exists to connect to/from the Metro stations as well as locations where there is a clustering of residents to encourage utilization.
- To help increase alley safety, investigate opportunities for increasing pedestrian lighting through new development adjacent to existing alleys.

**Figure 48: Civic and Cultural Resources – Slauson Metro A Line (Blue) Station**

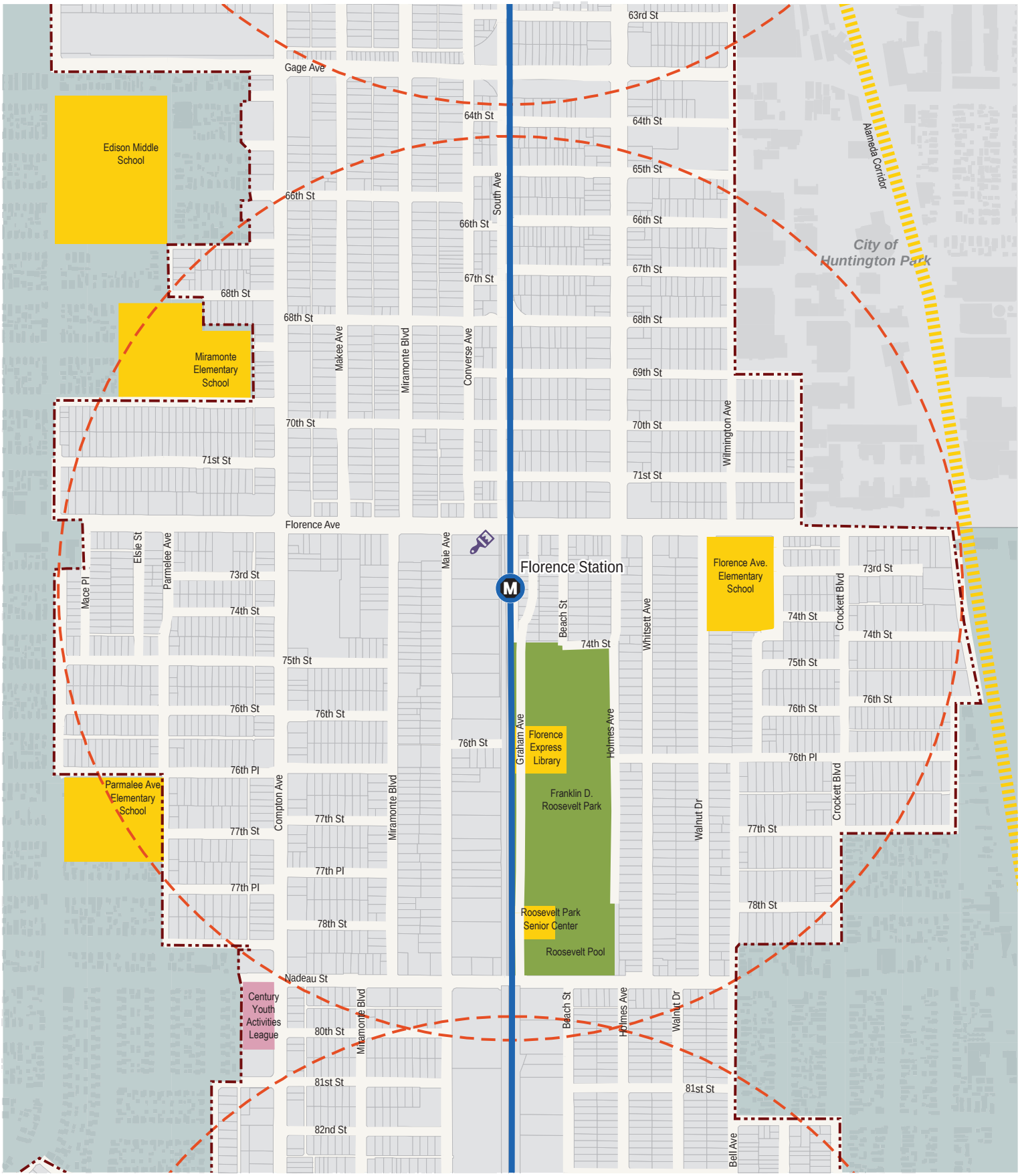



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Cultural or Civic Resource
Park or Recreation Space
Community-Identified Resource
Existing Civic Art

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 49: Civic and Cultural Resources – Florence Metro A Line (Blue) Station

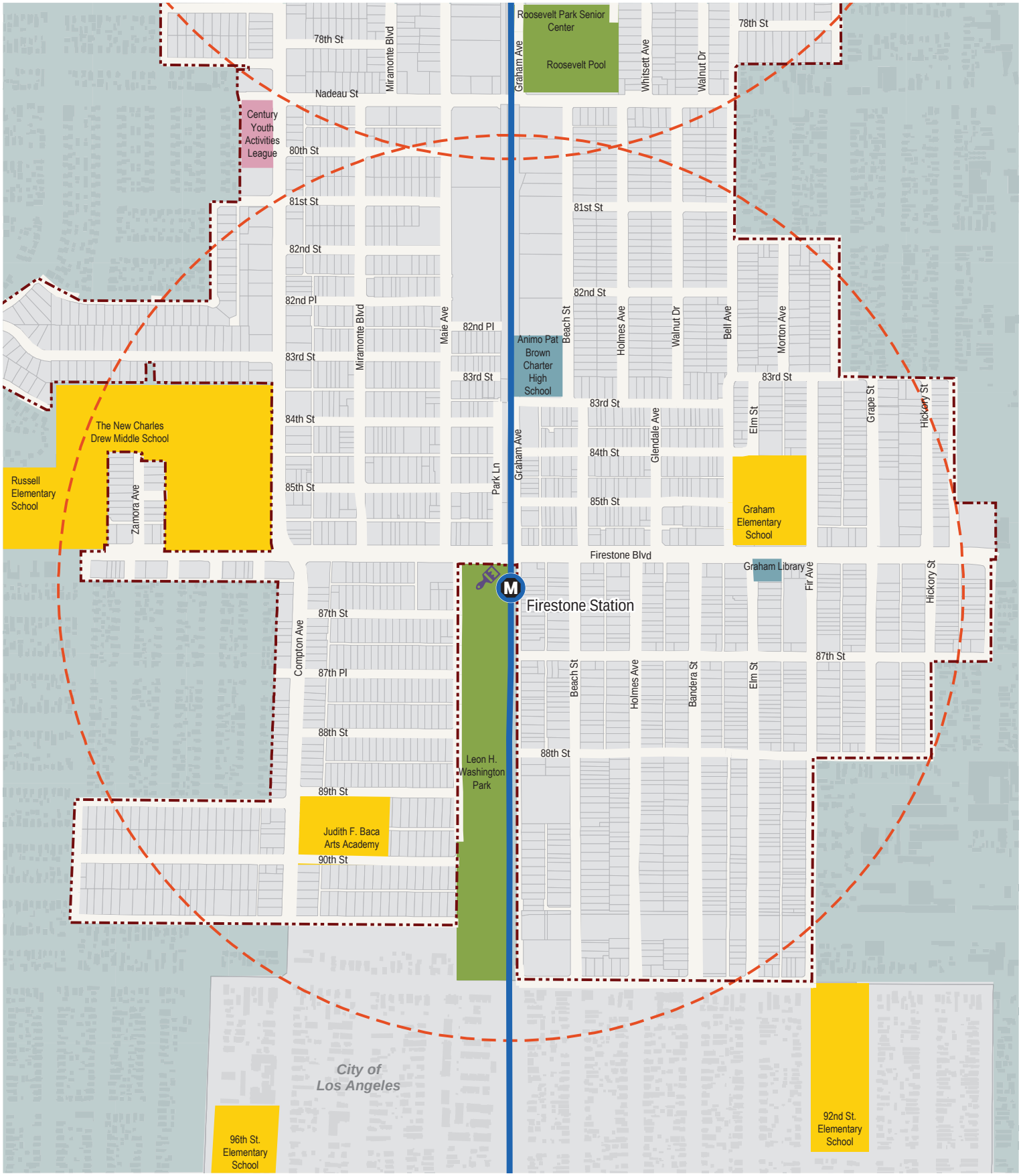



Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Cultural or Civic Resource
Park or Recreation Space
Community-Identified Resource
Existing Civic Art

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

## Figure 50: Civic and Cultural Resources – Firestone Metro A Line (Blue) Station




Study Area
Florence-Firestone
1/2 mile TOD Radius
Metro Station
Metro A Line (Blue)
Assessor Parcel
Cultural or Civic Resource
Park or Recreation Space
Community-Identified Resource
Existing Civic Art

0 375 750 Feet

*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 48: Civic and Cultural Resources Context: Community Facilities**

Youth Activities League (Former Sherrif's Department) | | Source: A Paseo Through Time in Florence-Firestone



Tessie Cleveland Community Services Corporation




Los Angeles County Florence-Firestone Community Service Center, 2nd Supervisorial District




County of Los Angeles Roosevelt Park




Roosevelt Park Senior Center

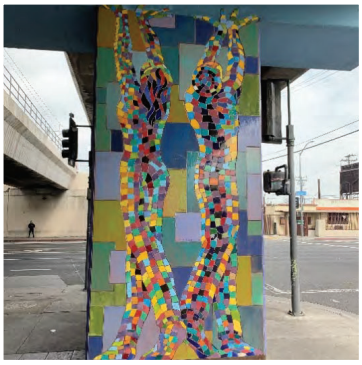


**Figure 49: Civic and Cultural Resources Context: Public Community and Civic Art**

Florence-Firstone Community Identity Marker along Florence Avenue



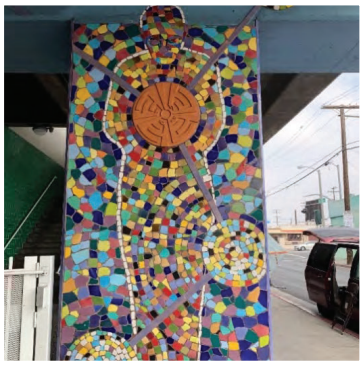

Public art at the Firestone Metro A (Blue) Line Station, pilars welcome riders



Decorative signae at the Florence Metro A (Blue) Line Station




Mural pilars at Firestone Metro A (Blue) Line Station



Community mural | Source: A Paseo Through Time in Florence-Firestone



**Figure 49: Civic and Cultural Resources Context: Public Community and Civic Art , Continued**

Community Mural "Short Stories" at Florence-Firestone Service Center



Community Mural "El Movimiento (The Movement)" by Oscar Magallanes at 1610 Florence Avenue | Source: Mural Conservancy of Los Angeles



Historic Sign at Car Wash at 1653 Florence Avenue | Source: Jonathan Pacheco-Bell



Florence Library community mural | Source: A Paseo Through Time in Florence-Firestone



**Figure 49: Civic and Cultural Resources Context: Public Community and Civic Art , Continued**

Community mural | Source: A Paseo Through Time in Florence-Firestone



Community mural | Source: A Paseo Through Time in Florence-Firestone



Community art at the Slauson Metro A (Blue) Line Station



Community Mural at Super Minimart 1557 Florence Avenue



Community Mural



## 3.2.2 Historic Resources

Consistent with the FFCP Chapter 2 Community History, historic resources in the community have not been identified. The County of Los Angeles GIS database has identified many historic resources in the County, none of which are located in the Florence-Firestone community.

To understand potential opportunities for historic resources in the Study Area, a desktop reconnaissance of the Study Area was undertaken via Google Earth in addition to historic properties research within the Study Area. The following includes a discussion of previously recorded built environment resources within the Study Area, desktop survey results, and property types.

### 3.2.2.1 Previously Recorded Cultural Resources within Study Area

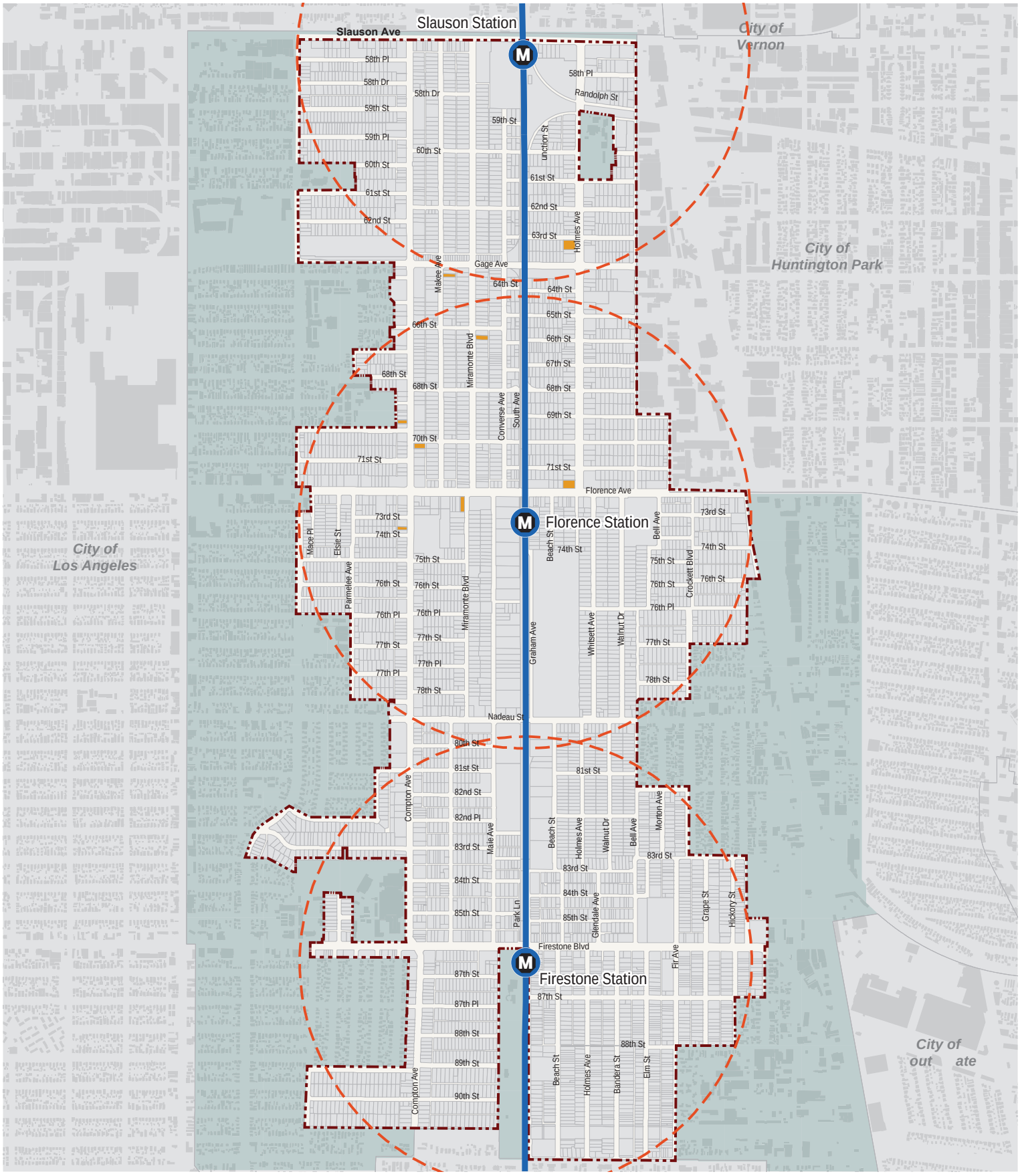
The California Office of Historic Preservation (OHP) inventory, the Built Environment Resources Directory (BERD) provides information regarding non-archaeological resources. This inventory is organized by street, and a total of 27 previously recorded built environment resources were identified within the Study Area. These resources were assigned status codes 6U, 6Y, and 7R (6U=Determined ineligible for the National Register of Historic Places pursuant to Section 106 without review by OHP) (6Y= Determined ineligible for the National Register by consensus through Section 106 process – Not evaluated for the California Register of Historical Resources or local listing) (7R= Identified in Reconnaissance Level Survey or in an Area of Potential Effects: Not evaluated).

### 3.2.2.2 Survey Results

The desktop survey of the Study Area identified 98 *individual* properties of interest. These properties are over 45 years old; exhibit a moderate to high degree of historic integrity of design, materials, and workmanship; and/or possess historic significance related to the development of the community. Of these 98 properties, nine are identified in Jeannene Przyblyski's book *A Paseo Through Time in Florence-Firestone.* The other properties identified within *A Paseo Through Time in Florence-Firestone* are either outside of the Study Area or are no longer extant. **Table 7** lists the identified properties.

In addition, the residential properties along Miramonte Boulevard from Gage Avenue to Florence Avenue represent a potential historic district with 92 historic-age properties. This corridor possesses single-family and multiple-family residential properties, largely constructed between 1900 and 1930 (with very little modern infill development) and defined by mature palm trees lining either side of the street. Many of these properties would not be eligible individually; however, as a unit they appear to be the most intact representation of Folk Victorian, Craftsman, and Minimal-Traditional-style residences in the study area. The Miramonte Boulevard concentration of residential properties appears eligible for historic district designation as an example of a streetcar suburb retaining its character-defining features such as consistent setbacks, narrow lots, street landscaping, and streets laid out on a grid.

**Figure 53: Built Environment Resources Directory (BERD) Results in Study Area**




Study Area

Florence-Firestone

1/2 mile TOD Radius

Assessor Parcel

Metro Station

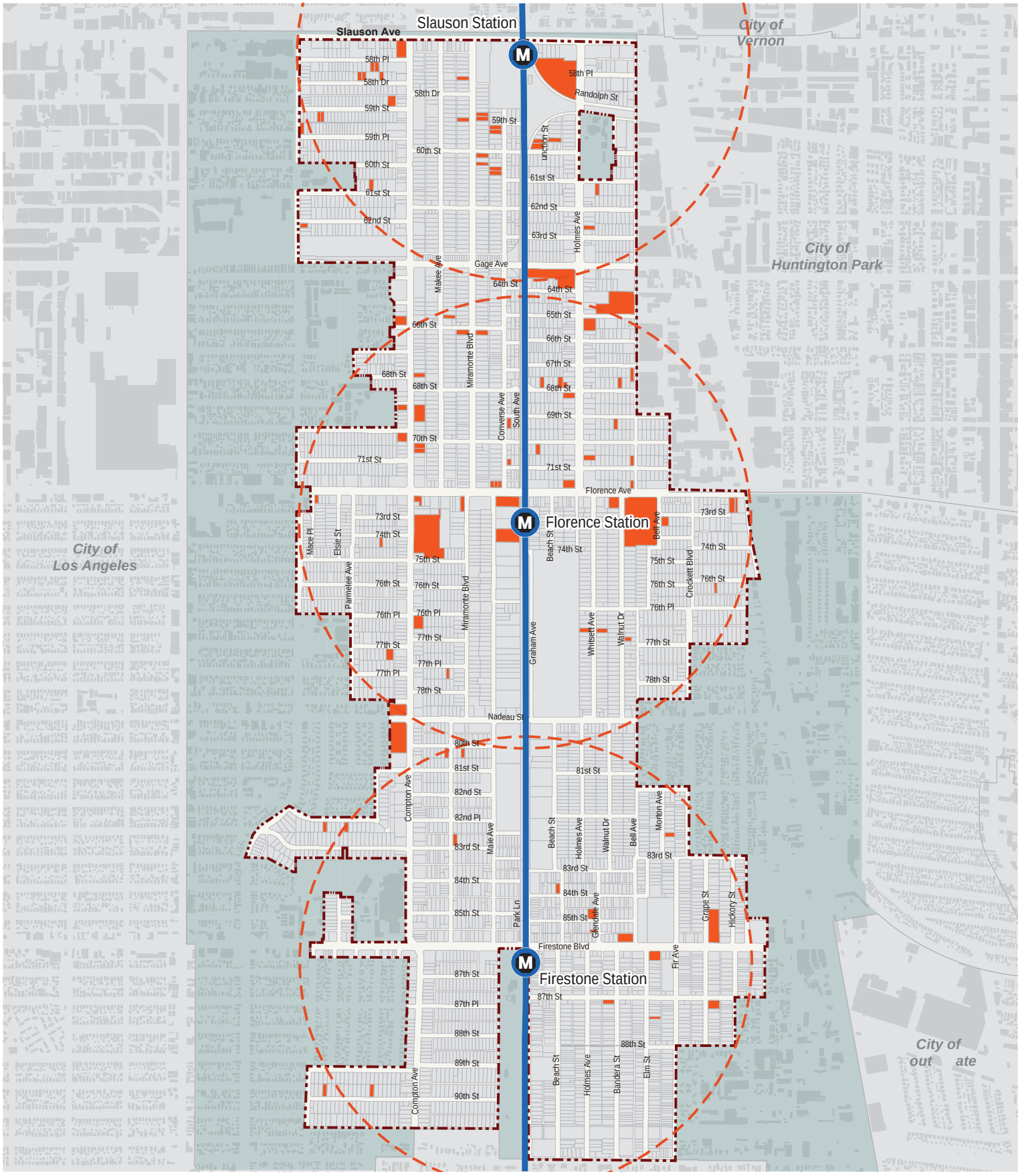
Metro A Line (Blue)

Built Environment Resources Directory

0 750 1,500 Feet

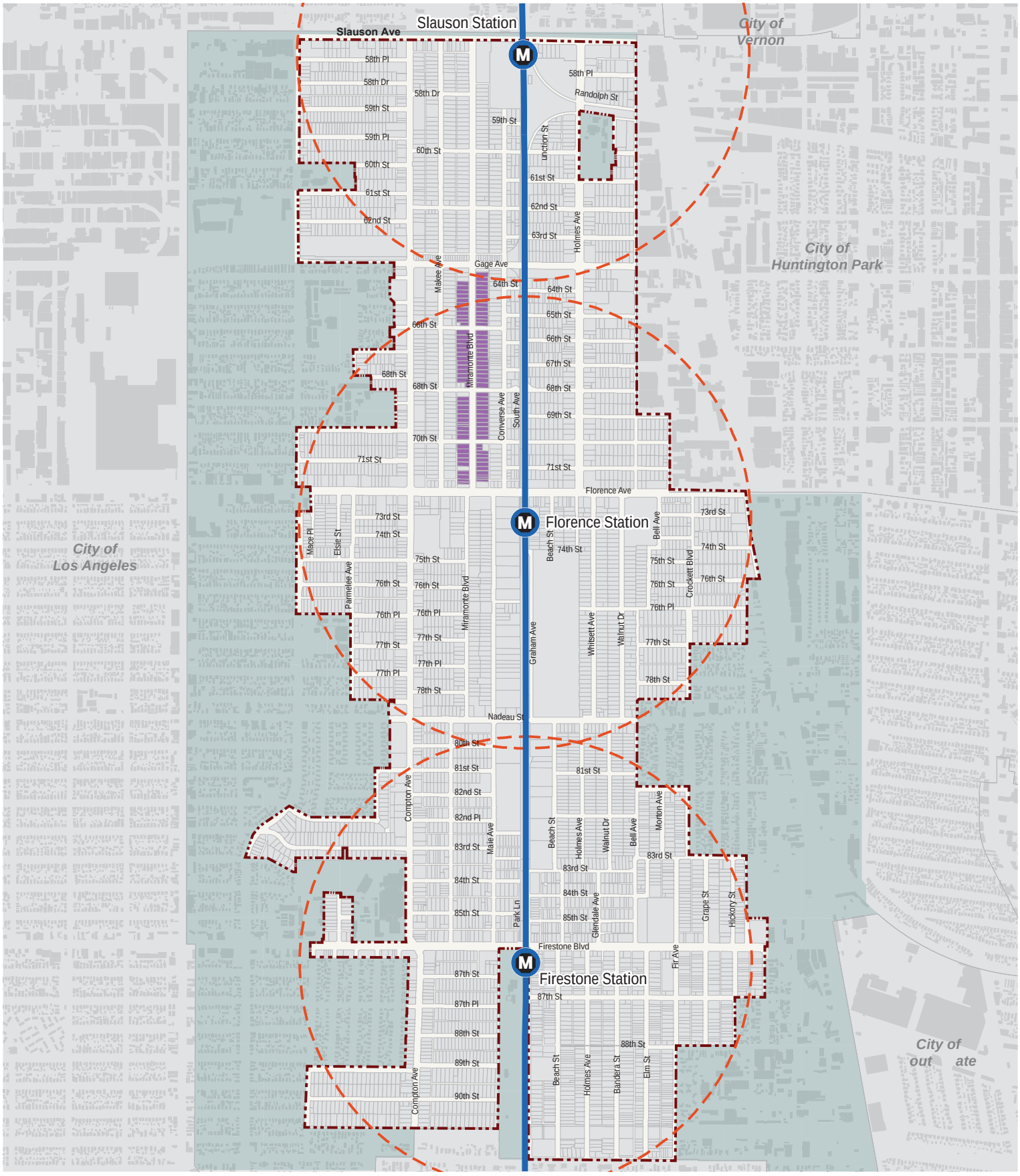
*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

**Figure 54: Individual Properties of Interest in Study Area**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

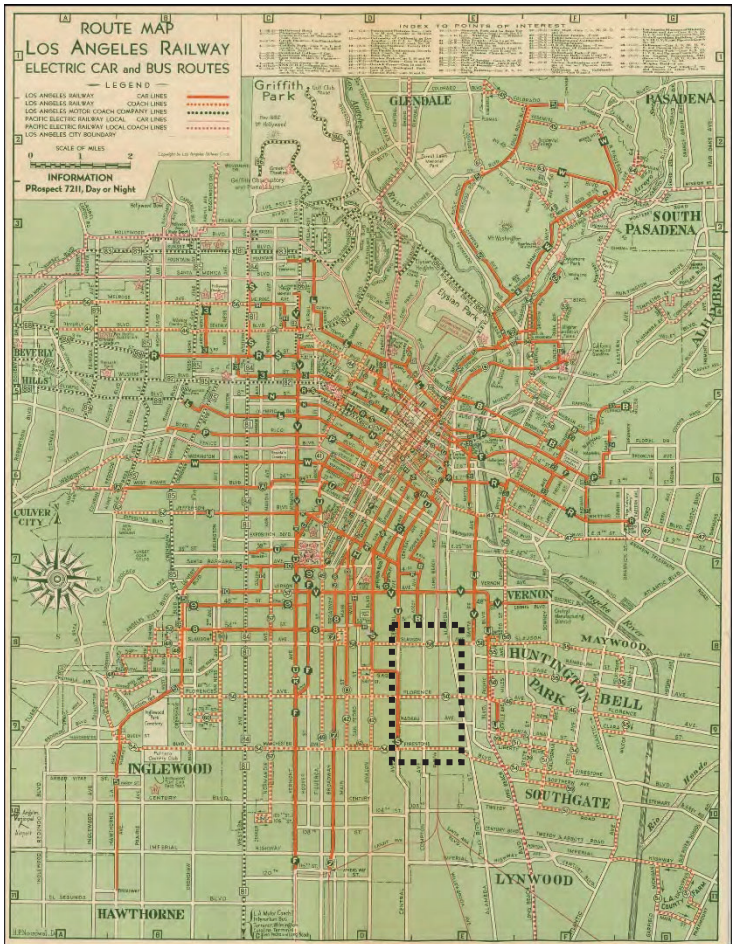
**Figure 55: Potential Historic District along Miramonte Boulevard**




*Sources: County of Los Angeles; Esri; AECOM; Vivid 2018; LARIAC*

### 3.2.2.3 Summary of Property Types within the Study Area

The Study Area largely comprises single-family residential neighborhoods. The neighborhoods in Florence and Graham/ Firestone Park feature concentrations of early 20th century single-family residences interspersed with commercial and industrial corridors. These neighborhoods developed primarily due to their proximity to historic streetcar routes (see image at right with Study Area boundary approximation for reference). Though located near streetcar lines, these neighborhoods often feature accommodation for automobiles, such as detached garages and paved driveways.




*Los Angeles Railway Map, 1938* *Source: Raremaps.com*

Many of the residential buildings in the study area have been altered over time, such as replacement windows and doors, stucco finish over original wall cladding materials, and the removal of features such as window surrounds and trim.

Multi-family residences in the survey area are intermittently located in predominantly single-family residential neighborhoods. Multi-family development in the study area typically consists of duplexes, fourplexes, and small apartment buildings. Scattered throughout the study area are bungalow courts from the early 20th century, designed in a variety of popular architectural styles including Craftsman and Mission Revival.

Commercial property types are found on the major thoroughfares running north-south along Compton Avenue and east-west along Slauson Avenue, Florence Avenue, Nadeau Street, and Firestone Boulevard. The commercial buildings included one- and two-story Commercial Block buildings and Mid-20th Century Storefronts. The historic-period industrial development in the study area is largely concentrated along Maie Avenue and Wilmington Avenue and includes factories, warehouses, and storage sites. Longstanding industrial sites can be seen in historic imagery from the Los Angeles County Public Library and are included for historic context of the Study Area.



Alameda Street, Gage Avenue, and Compton Avenue, looking northwest, 1955

Aerial view of Emsco Manufacturing Co., located at 6811 S. Alameda Street, just north of Florence Avenue. View is looking northwest; Alameda Street runs along right corner, Florence Avenue is on extreme left corner, Gage Avenue runs diagonally through middle (upper left to lower right), and Compton Avenue diagonally from middle left to upper right. Photograph dated November 22, 1955.
Source: https://tessa.lapl.org/cdm/singleitem/collection/photos/id/4540/rec/17



Alameda Street and Florence Avenue, looking west, 1955

Aerial view of Emsco Manufacturing Co., located at 6811 S. Alameda Street, just north of Florence Avenue. View is looking west; Alameda Street runs along bottom of image, Florence Avenue is visible across upper left corner, and Gage Avenue is on the right. Photograph dated November 22, 1955.
Source: https://tessa.lapl.org/cdm/singleitem/collection/photos/id/4533/rec/38



Soule Steel Co., Los Angeles, looking west, 1958
Aerial view of Soule Steel Co. (large, white multi-roof), located at 6200 Wilmington Avenue; view is looking west. Gage Avenue, 63rd St., 62 St., and 61st St. are vertically from left to right; Alameda St. paralleled by the SPT CO RR are at bottom; Wilmington Ave. is horizontally at middle (behind the building); Holmes Ave. and South Ave. are horizontally farther up. Photograph dated January 2, 1958.
Source: https://tessa.lapl.org/cdm/singleitem/collection/photos/id/6256/rec/7

The Study Area also has a number of institutional property types. These properties include churches, schools, and government buildings such as the Century Sheriff's Youth Activity League, the Los Angeles County Probation Building, and the Los Angeles County Department of Public Social Services.

## FINDINGS + RECOMMENDATIONS

### Findings

- There are 98 individual properties of interest identified in the Study Area that are over 45 years old, exhibit a moderate to high degree of historic integrity of design, materials, and workmanship; and/or possess historic significance related to the development of the community.
- Building types vary throughout the Study Area, ranging from single-story industrial buildings with blank frontages, to two-story commercial buildings within a walkable corridor environment, to two-story newly constructed townhomes.

### Recommendations

- Further explore historic designation of identified properties of interest and a district along Miramonte Boulevard from Gage Avenue to Florence Avenue with 92 historic-age properties.
- Consider an educational component of community outreach that includes information regarding Los Angeles County's Historic Preservation Program and its procedures on how to nominate a property for historic designation, and preserve and maintain landmarks and historic districts.
- Collaborate with the County of Los Angeles Historic Preservation Program office to designate landmarks in the Study Area.

## Table 7: Historic-Period Properties of Potential Interest in the Study Area

| Address | Use Type | Year Built |
|---|---|---|
| 5829 COMPTON AVE | Commercial | 1946 |
| 1426 E 58TH PL | Residential | 1926 |
| 1422 E 58TH PL | Residential | 1912 |
| 1405 E 58TH DR | Residential | 1948 |
| 1411 E 58TH DR | Residential | 1907 |
| 1433 E 58TH DR | Residential | 1913 |
| 1445 E 59TH ST | Residential | 1904 |
| 1330 E 59TH ST | Residential | 1907 |
| 1326 E 59TH ST | Residential | 1922 |
| 1301 E 59TH PL | Residential | 1949 |
| 1419 E 61ST ST | Residential | 1910 |
| 6200 HOOPER AVE | Residential | 1908 |
| 5869 MIRAMONTE BLVD | Residential | 1923 |
| 5911 MIRAMONTE BLVD | Residential | 1920 |
| 5908 MIRAMONTE BLVD | Residential | 1963 |
| 5912 MIRAMONTE BLVD | Residential | 1964 |
| 5903 CONVERSE AVE | Residential | 1923 |
| 5907 CONVERSE AVE | Residential | 1922 |
| 6000 MIRAMONTE BLVD | Residential | 1915 |
| 6014 MIRAMONTE BLVD | Residential | 1910 |
| 6019 CONVERSE AVE | Residential | 1921 |
| 6025 CONVERSE AVE | Residential | 1912 |
| 1700 E 58TH PL | Industrial | 1955 |
| 5930 JUNCTION ST | Residential | 1921 |
| 5933 JUNCTION ST | Residential | 1931 |
| 5931 JUNCTION ST | Residential | 1913 |
| 1822 E 61ST ST | Residential | 1907 |
| 6220 HOLMES AVE | Residential | 1912 |
| 1740 E GAGE AVE | Commercial | 1970 |
| 1853 E 65TH ST | Industrial | 1932 |
| 6500 HOLMES AVE | Institutional | 1962 |
| 1854 E 67TH ST | Industrial | 1936 |
| 1863 E FLORENCE AVE | Residential | 1921 |
| 1747 E FLORENCE AVE | Commercial | 1933 |
| 6525 COMPTON AVE | Industrial | 1938 |
| 6901 COMPTON AVE | Residential | 1914 |
| 6516 MAKEE AVE | Residential | 1915 |
| 6602 MIRAMONTE BLVD | Residential | 1946 |
| 6601 MIRAMONTE BLVD | Residential | 1940 |
| 6726 COMPTON AVE | Residential | 1922 |

| | | |
|---|---|---|
| 6900 COMPTON AVE | Institutional | 1951 |
| 6904 CONVERSE AVE | Residential | 1928 |
| 1655 E 71ST ST | Residential | 1912 |
| 1635 E FLORENCE AVE | Commercial | 1912 |
| 1633 E FLORENCE AVE | Commercial | 1928 |
| 1621 E FLORENCE AVE | Commercial | 1923 |
| 7000 COMPTON AVE | Residential | 1913 |
| 7008 COMPTON AVE | Commercial | 1921 |
| 7807 COMPTON AVE | Government | - |
| 7660 COMPTON AVE | Institutional | 1950 |
| 1500 E FLORENCE AVE | Commercial | 1928 |
| 1560 E FLORENCE AVE | Commercial | 1941 |
| 7220 MAIE AVE | Commercial | 1964 |
| 7322 MAIE AVE | Industrial | 1933 |
| 1318 E FLORENCE AVE | Commercial | 1933 |
| 2048 E FLORENCE AVE | Commercial | 1932 |
| 7201 S ALAMEDA ST | Commercial | 1948 |
| 8526 GRAPE ST | Government | - |
| 1839 FIRESTONE BLVD | Institutional | 1964 |
| 1721 E 68TH ST | Residential | 1923 |
| 1739 E 68TH ST | Residential | 1928 |
| 1745 E 68TH ST | Residential | 1913 |
| 6805 HOLMES AVE | Residential | 1924 |
| 1845 E 68TH ST | Residential | 1924 |
| 1842 E 69TH ST | Residential | 1913 |
| 1716 E 70TH ST | Residential | 1910 |
| 1863 E 71ST ST | Residential | 1929 |
| 7016 HOLMES AVE | Residential | 1922 |
| 1432 E 74TH ST | Residential | 1952 |
| 1442 E 77TH ST | Residential | 1896 |
| 1542 E 77TH PL | Residential | 1925 |
| 7675 WHITSETT AVE | Residential | 1922 |
| 7672 WHITSETT AVE | Residential | 1922 |
| 7211 BELL AVE | Government | - |
| 7684 WALNUT DR | Residential | 1924 |
| 1930 E 73RD ST | Residential | 0 |
| 2026 E 76TH ST | Residential | 1910 |
| 1540 E 80TH ST | Residential | 1960 |
| 8272 MIRAMONTE BLVD | Residential | 1910 |
| 1610 E 80TH ST | Residential | 1925 |
| 8218 MORTON AVE | Residential | 1920 |
| 1737 E 84TH ST | Residential | 1905 |
| 1785 E 85TH ST | Institutional | 1933 |

| | | |
|---|---|---|
| 8511 HOLMES AVE | Institutional | 1928 |
| 2008 E 87TH ST | Institutional | 1929 |
| 8701 BANDERA ST | Residential | 1910 |
| 8716 ELM ST | Residential | 1913 |
| 1319 E 90TH ST | Residential | 1965 |
| 1423 E 90TH ST | Residential | 1955 |
| 8629 BANDERA ST | Residential | 1921 |
| 1900 FIRESTONE BLVD | Commercial | - |
| 1428 E 82ND ST | Residential | 1947 |
| 1402 E 82ND ST | Residential | 1947 |
| 1830 E FLORENCE AVE | Commercial | 1981 |
| 7807 COMPTON AVE | Government | - |
| 7001 COMPTON AVE | Commercial | 1946 |
| 7316 COMPTON AVE | Commercial | 1961 |

**Figure 56: Historic Context: Property Types**

Commercial Context - Florence Avenue



Commercial Context - Florence Avenue




Commercial Context - Florence Avenue



Residential Context



Residential Context



Gentry Theater | Source: A Paseo Through Time in FLorence Firestone



# APPENDIX D: PUBLIC OUTREACH

LOS ANGELES CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

April 14, 2021

**Sent Electronically**

Mr. Norman Ornelas, Jr.
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
Email: nornelas@planning.lacounty.gov

**RE: Notice of Preparation (NOP) for the Florence-Firestone Transit-Oriented District (TOD) Specific Plan (FFTOD), Project No. PRJ2020-003127 / Case No(s). Specific Plan: RPPL2020009556, Environmental: RPPL2020009523**

Dear Mr. Ornelas:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Florence-Firestone Transit-Oriented District (TOD) Specific Plan (FFTOD) Notice of Preparation (NOP). The proposed FFTOD will implement the LA County General Plan 2035 TOD Program and proposes new zoning categories, primarily within the 0.5-mile TOD area of the three Metro A Line stations, that include development standards and design guidelines appropriate for meeting the planned density and intensity established by the General Plan Land Use Designations. The Project will also update zoning categories for sites identified for the Regional Housing Needs Assessment (RHNA) by the Housing Element update (HEU).

In addition, the FFTOD would establish or widen sidewalks at key locations within the 0.5-mile TOD areas (portions of Slauson Avenue, Compton Avenue, Holmes Avenue, Nadeau Street, and Firestone Boulevard) from the current range of 6 feet to 14 feet to the desired 12 feet to 15 feet and parkways with a minimum of 10 feet. This may be accomplished through expanding the right-of-way or through private setback conditions that contribute to the sidewalk width; specific strategies will be identified in the FFTOD. Proposed improvements to sidewalks may adversely impact historic resources.

## I. Potential significant and unavoidable impacts to cultural resources

The Conservancy would like to better understand the proposed project as we believe zoning changes may result in direct and/or indirect significant impacts to cultural resources in the project location. According to the

California Office of Historic Preservation's Built Environment Resources Directory, a total of 27 previously recorded built environment resources were identified within the focused change area. Therefore, the Project may result in a substantial adverse change to these identified historic resources. In addition, according to the 2019 Florence-Firestone Community Plan, the majority of structures in Florence-Firestone were built during the 1920s through 1940s and have the potential to be considered historic resources, and may also be subject to significant and unavoidable environmental impacts.

A desktop reconnaissance study conducted by AECOM in September 2020, found 98 "individual properties of interest" which were over 45 years old, exhibit a moderate to high degree of historic integrity of design, materials, and workmanship, and/or possess historic significance related to the development of the community.[1] Additionally, the study found residential properties along Miramonte Boulevard from Gage Avenue to Florence Avenue represent a potential historic district with 92 historic-age properties. While we look forward to reviewing the Cultural Resources Technical Report, which will be prepared for the Project, we strongly encourage the Project Team to additionally conduct a Historic Resources Survey as part of the FFTOD. The Historic Resources Survey should include a community outreach component which will allow community stakeholders opportunities to provide input on local historic and cultural resources.

## II. Additional preservation alternatives should be evaluated and considered

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."[2] To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."[3] The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.[4] Reasonable alternatives must be considered "even if they substantially impede the project or are more costly."[5] Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.[6]

To ensure fair consideration of environmentally superior alternatives, the County of Los Angeles Department of Regional Planning should also examine the feasibility of adaptive reuse, modifications to zoning/land use, and introduction of incentive mechanisms in conjunction with the goals and objectives for the FFTOD.

The Conservancy strongly urges the County evaluate and consider these alternatives as part of a FFTOD, given CEQA's requirement to fully analyze alternatives and reduce impacts to historic resources where possible. This new information should be provided in the Draft EIR, allowing the public to better understand and comment on the full range of impacts and provide input prior to any issuance of a Final EIR.

In conclusion, the FFTOD is planned for a location with many cultural resources in unincorporated Los Angeles County. We strongly encourage the County of Los Angeles Department of Regional Planning conduct a Historic Resources Survey as part of the FFTOD, and explore historic designation of identified properties of interest and the potential historic

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[1] Florence-Firestone Community Atlas (September 2020), 87.
[2] Public Resource Code, Sec. 21001 (b), (c).
[3] *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.
[4] Guideline § 15126.6(a).
[5] *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).
[6] Public Resources Code § 21081.5.



district along Miramonte Boulevard. Any proposed sidewalk improvements should take care to minimize and avoid impacts to cultural resources and streetscapes. And, feasibility of adaptive reuse, modifications to zoning/land use, and introduction of incentive mechanisms should be evaluated and considered as part of the FFTOD.

Lastly, the Conservancy requests a meeting with both County of Los Angeles Department of Regional Planning and Florence-Firestone advocates. We believe that a meeting with the requested parties will provide an opportunity for the preservation community and County of Los Angeles Department of Regional Planning staff to find strategies to minimize and avoid impacts to historic resources in the FFTOD Project Area.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

April 19, 2021

COMMUNITIES FOR A BETTER ENVIRONMENT
40 years | established 1978

Norman Ornelas, Jr., Regional Planner
County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
nornelas@planning.lacounty.gov

**Re: Comment letter regarding FFTOD potential environmental effects.**

Dear Mr. Ornelas:

We at Communities for a Better Environment (CBE) appreciate the ability to submit this comment letter regarding the Florence-Firestone Transit-Oriented District Specific Plan ("FFTODSP"). The continuing COVID-19 pandemic has created many challenges in trying to meaningfully engage in public outreach. Many projects that CBE are presently working on remain greatly impacted by the digital divide and we ask that governmental agencies have patience when working with community-based organizations. While 30 days were given for public comment, we hope that with the future release of the Draft EIR the Department of Regional Planning provides at minimum 60 days for public comment. The proposed project will have many lasting impacts on the community, including CBE's membership in Southeast Los Angeles, and public input will be crucial for the success of this project.

Communities for a Better Environment is a community-based environmental justice organization located in both Southern and Northern California. In Southern California CBE is based out of Huntington Park and Wilmington.

The majority of census tracts in the area impacted by this proposed project scores within the 90$^{th}$ percentile under the California Environmental Screening tool ("CES"). CES is a mapping tool that aggregates data to identify which California communities are most impacted by environmental and socio-demographic burdens. CES uses environmental, health and socioeconomic information to produce scores for every census tract in the state. An area with a high CES score is one that experiences a much higher pollution burden than areas with low scores.

**COMMUNITY STABILITY**

FFTODSP is proposed in a community that has been historically disinvested in for decades. Projects within this corridor must utilize different anti-displacement strategies to ensure community stability. The map that shows the proposed project when overlayed on a map of the opportunity zones, shows that this area is also in danger of gentrification

impacts due to speculative investment. It is crucial to include robust public participation in furtherance of this project.

The area where the proposed TOD will go also has extremely high rates of rental burden and housing scarcity. It is crucial that upzoning in this area is tied to deeply affordable housing. Affordable housing creation and preservation is integral to community stability. In order to create an adequate Draft EIR we urge DRP to include an analysis of housing displacement and potential impacts on community character. Existing residents should be given priority access to affordable housing in the FFTOD to mitigate negative impacts caused by gentrification, such as loss of affordable housing.

Along with ensuring affordable housing, it is important to create a traffic and parking study in the Draft EIR. Currently, the area faces many parking challenges. While the goal is to ensure that there is a transit corridor that services the community, it is also important to balance equity needs where households require parking and car usage in order to engage in their livelihoods.

In addition, it would be helpful to provide community residents some level of literature review that substantiates the "benefits" and "costs" of this project, specifically outlining proposed demographic impacts and a timeline. Since this is not the first TOD project to be constructed, it would be helpful to review other TOD projects within LA County to assess the actual versus expected changes in: traffic magnitude and duration, vehicle miles traveled (e.g. average vs total), income levels, adjusted average rent rates, ridership, shifts, car density per dwelling unit, and commute times. This type of information would be helpful for community residents to understand the complete impact of this project.

The project should produce a corridor that creates community connectivity and should be intentional in the development of walkway improvements and bike lanes. For this, we suggest working closely with community members in developing programs that they would like to see.

**HAZARDOUS WASTE**

An assessment of the area shows potential contaminants from hazardous waste on the site, which could lead to harmful impacts on community health if disturbed during the process of project development. A thorough analysis of soil contamination is suggested prior to protect commencement.

The main goals of this project are to:

- Create transit-accessible housing development;
- Increase job-generating uses and economic activity;
- Develop a safe and attractive transportation network;
- Increase walking, bicycling, and transit ridership; and
- Streamline the environmental review process for future development projects in the community.

Streamlining projects in communities that have high rates of toxins in the soil is the soil is concerning given that projects may be approved without a thorough and proper analysis of the environmental impacts. Decades of industrial uses in these communities have resulted in higher pollution burden than the rest of the county. Often many empty lots are left as brownfields and no proper remediation is done. In contemplation of this project, an analysis should be done of the soil and soil vapor. Projects that are streamlined may not analyze these impacts and the rezoning of industrial to different uses will amount to community concerns in the future. In short, the FFTOD must include a hazardous waste clean-up analysis, including updated Cortese List Data Resources.

**WATER IMPACTS**

Similarly, to hazardous waste, groundwater contamination is a potential concern. The high concentration of industrial uses could have resulted in the improper removal of contaminants, and subsequently potential impacts on the area's water sources. Further development along this corridor may exacerbate negative water-quality impacts on the water table in the area. The DEIR must include an extensive hydrology and water quality analysis .

In addition, CBE would like to see how this project meets quantity and quality compliance standards stipulated in various Regional Water Quality Control Boards; specifically, how will this project meet the water quantity limits for on-site water retention?

**PARK EQUITY/GREEN SPACE**

Currently the area of the proposed project is considered to be park poor and lacking in public parks and green space. An analysis of park equity should be included in the FFTOD. In addition, any proposed rezoning should include incentives that encourage development of community parkland and green space for active and passive use. Integration of things like an urban tree canopy would be helpful to reduce pollution impacts from the transit corridor.

**PRESERVING CULTURAL AND COMMUNITY SPACES**

The Florence-Firestone library was mentioned in the Initial Study. Currently the community has had no access to this community resource, and it would be helpful to determine how this project will impact the library. Prior to the closing of the library, community groups and learning enrichment programs used the library to hold events. It is important that the library, which is seen as a vital resource for the community, remains readily accessible.

In the Draft EIR of this project, there is a mention of cultural resources, but it would be helpful to clearly identify those spaces. The community should be able to preserve potentially historic properties and not simply rezone those areas without community approval.

**CONCLUSION**

It is CBE's hope that the DRP work alongside community to develop this undertaking. This project must be one that helps preserve the rich history and community of Florence-Firestone as well as address many of the consequences of decades old racist practices of redlining. We look forward to working with DRP and hope that these comments may be useful in the creation of the Draft EIR.

Sincerely,



Jennifer Ganata
Senior Staff Attorney
Communities for a Better Environment

**From:** Ashley Orona <oronash@gmail.com>
**Sent:** Wednesday, April 14, 2021 5:00 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; Gabriela Cid <AGCid@bos.lacounty.gov>; Amy Bodek <ABodek@planning.lacounty.gov>
**Subject:** Written Comment for FFTOD Specific Plan

CAUTION: External Email. Proceed Responsibly.

Dear whomever it may concern:

This letter is to outline several concerns regarding the Florence-Firestone Transit Oriented Specific Plan and recommendations on items that should be incorporated as part of this project.

Several residents have voiced concerns with limited and competitive parking in the community being amplified by recent and future developments. Since this project will be rezoning to allow for more and bigger development we feel it is reasonable to conduct a

parking study to make sure we are allocating sufficient parking spaces to the current and future residents. I understand that the County wants to move away from residents driving but the reality is that in our community many residents depend on their vehicles as a tool for their jobs, therefore, we need to plan for cars. A parking study can help evaluate solutions.

Another concern many residents have brought up to me while doing outreach for this project is that building height for the mixed used commercial corridors planned should be no more than 3-4 floors. Planning for future development aimed at increasing density by allowing taller buildings isn't sustainable for our urban community. Many residents have already expressed concern with the new development at 1600 E Florence Ave that is five floors, the tallest building in Florence-Firestone currently. They mention that the new building blocks the light from residential units right next door and eliminates any privacy that they have in their yards.

Many community members have also brought up incorporating a permanent independent building to house the Florence Library as part of the plan. There are two abandoned buildings on Florence Avenue that residents suggest: former ACE Hardware Store and Grifols Plasma Center.

I would like to suggest that rezoning in smaller residential streets such as those indicated as pink in the draft concept map be reduced, limited, or not done at all; rezoning should only be done on main streets. Rezoning large parts of the residential streets will be a direct cause of displacement. The reason for that is that many residents in Florence-Firestone are renters so if the property owner/landlord decides to, for example, redevelop an existing single-family home to courtyard homes, then the family living in the existing home can be at risk of displacement. Rezoning might also make it attractive to slumlords to sell their properties to big developers who have the means of building the type of housing that is being planned for. Many mom and pop property/ homeowners may not have the money or resources to redevelop, therefore, oy seems like developers are the big winners here, not the community. It seems like the plan focuses too much on new development instead of fixing a lot of the land that is currently underutilized and fixing a lot of the affordable housing that already exists.

Additionally, it seems like rezoning will put at risk a significant amount of culturally significant buildings in Florence-Firestone, including but not limited to the addresses below. We ask that these and other culturally significant spaces are not rezoned.

- Gentry Theater by architect S. Charles Lee
    - 6525 Compton Ave. Los Angeles, CA 90001
- Storybook house on Firestone Blvd.

    - 2181 Firestone Blvd. Los Angeles, CA 90001
- Graham Library
    - 1900 E. Firestone Blvd. Los Angeles, CA 90001 (current location)
    - 1925 E. 87th St. Los Angeles, CA 90002 (former location)
    - 8511 Holmes Ave. Los Angeles, CA 90001 (former location)
- The Century Youth Activities League (formerly the Firestone Park Sheriff's station) by architect James H. Garrott
    - 7901 Compton Ave. Los Angeles, CA 90001 - current location of Century Youth Activities League
    - 2201 E. Firestone Blvd. Los Angeles, CA 90001 - second location of Firestone Park Sheriff's station
    - 1551-1555-1557 E. Florence Ave. (1st location of Firestone Park station; also former locations of the Florence Library and Florence-Firestone Chamber of Commerce)
- Tessie Cleveland Community Services Corporation by architect James H. Garrott
    - 8019 Compton Ave. Los Angeles, CA 90001
- The Youth Activities League on Makee

    - 7116 S. Makee St. Los Angeles, CA 90001

- The Miramonte Blvd. Palm trees

    - Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south)

Please let me know if you have any questions regarding anything mentioned. You can reach me at this email.

Regards,
Ashley Orona

**From:** Yanel Saenz <yn.saenz@gmail.com>
**Sent:** Wednesday, April 14, 2021 3:36 PM
**To:** DRP FFTOD <FFTOD@planning.lacounty.gov>
**Cc:** Norman Ornelas <NOrnelas@planning.lacounty.gov>; Patricia Hachiya <phachiya@planning.lacounty.gov>; Gabriela Cid <AGCid@bos.lacounty.gov>; Amy Bodek <ABodek@planning.lacounty.gov>
**Subject:** Written comments for the FFTOD Specific Plan

CAUTION: External Email. Proceed Responsibly.

Hello FFTOD team,

I am submitting my written comments for the FFTOD Specific Plan as part of this comment period for the Initial Study and Notice of Preparation.

**Outreach:** First and foremost, I want to echo what other fellow residents have voiced in previous FFTOD Plan meetings regarding outreach for this project - this plan is proposing significant zoning changes to our community and many more Florence-Firestone residents should know about it. I urge there be more funding allocated towards outreach to all Florence-Firestone residents. At minimum, two mailers from DRP should be sent out to all residents informing them of the upcoming FFTOD meetings (along with a summary of the plan, the proposed zoning changes, and where to find more information).

**Aesthetics question a):** This question asks if the FFTOD Plan will have a substantial adverse effect on a scenic vista and is marked as “Less than Significant Impact” and the description states that there are no identified scenic resources within the study area. However, I want to point out that at the Roosevelt Park pedestrian bridge, the Firestone Metro Station, and the Slauson Metro Station, you are able to access scenic views of Downtown Los Angeles and the San Gabriel Mountains. The Roosevelt Park pedestrian bridge, in particular, represents a publicly accessible vantage point (whereas the Metro stations would require fare payment to access the elevated platforms). Many residents go to this vantage point to enjoy the view of Downtown Los Angeles with the mountains in the background and often take photos.

There aren't many locations in Florence-Firestone where you can access these type of views, and so with the rezoning to allow potential construction of high rise apartment complexes along commercial corridors north of Firestone Boulevard and north of Florence Avenue, these views will be obstructed (side note to include in the standards: the heights for future buildings along mixed-use corridors should be no more than 3-4 stories tall) and Florence-Firestone residents will lose access to these scenic views. At the scoping meeting it was mentioned that the scenic vistas being considered for the FFTOD Specific Plan only refer to scenic vistas designated in the General Plan or another planning document. The current FFTOD Specific Plan process seems to me like a great opportunity to be able designate this as a scenic vista and include it in this planning document. Also, I want to point out that the Florence-Firestone Community Plan includes a photo of the view from the Roosevelt Park pedestrian bridge (page 6). Therefore, although this view may not be explicitly mentioned as a scenic vista in planning documents, the scenic view is included there as a photograph and being used to enhance the aesthetics of this planning document, which I would argue means that residents and planning staff involved in the creation of the Florence-Firestone Community Plan agree that it's a great scenic view. I disagree with this question being marked as "Less Than Significant Impact" and this should be studied in the EIR and leveled up to "Potentially Significant Impact."

**Cultural/Historic Resources:** properties that have buildings with historic potential should not be rezoned so that the community has more time to investigate their historic and/or cultural significance and ask the County to conduct an in-depth historic resources survey (as there has been no historic landmark survey yet done in Los Angeles County and further, in Florence-Firestone). Rezoning may activate these properties for redevelopment and demolition, and we want to preserve as many historic and culturally significant buildings as possible. There were 98 properties identified through the desktop reconnaissance survey in the FFTOD Community Atlas document. Ideally, I would not want any of these 98 to be rezoned. However, below is a list of properties that have cultural and/or historic value that we want to prioritize at the moment (this is a living list and there may be many more that we haven't yet learned more about and may add later). Some of these properties are highlighted in the 2018 book by Jeannene Przyblyski titled *A Paseo Through Time in Florence-Firestone*, the first book to document the history of Florence-Firestone.

a. Gentry Theater by renowned movie theater architect S. Charles Lee
    i. 6525 Compton Ave. Los Angeles, CA 90001
b. Graham Library

i. 1900 E. Firestone Blvd. Los Angeles, CA 90001 (current location)

ii. 1925 E. 87th St. Los Angeles, CA 90002 (former location)

iii. 8511 Holmes Ave. Los Angeles, CA 90001 (former location)

c. The Century Youth Activities League (formerly the Firestone Park Sheriff's station) by architect James H. Garrott

i. 7901 Compton Ave. Los Angeles, CA 90001 - current location of Century Youth Activities League

ii. 2201 E. Firestone Blvd. Los Angeles, CA 90001 - second location of Firestone Park Sheriff's station

iii. 1551-1555-1557 E. Florence Ave. (1st location of Firestone Park station; also former locations of the Florence Library and Florence-Firestone Chamber of Commerce)

d. Tessie Cleveland Community Services Corporation by architect James H. Garrott

i. 8019 Compton Ave. Los Angeles, CA 90001

e. The Youth Activities League on Makee

i. 7116 S. Makee St. Los Angeles, CA 90001

f. Miramonte Blvd. (Palm trees and homes)

i. Along Miramonte Blvd. between E. 66th St. (north) and E. Florence Ave. (south)

**Florence Library:** The future location of the Florence Library remains a concern for Florence-Firestone residents that I want to highlight in case there are opportunities and strategies through the FFTOD Specific Plan to bring the library back to Florence Avenue. At the moment, the location for the library is set to be on the second floor of the County Constituent Services Center. However, there are two abandoned buildings on Florence Avenue, minutes away from the original location. These two buildings are the ACE Hardware Store (1669 E. Florence Ave. Los Angeles, CA 90001) and the Grifols Plasma Center (1715 E. Florence Ave. Los Angeles, CA 90001) and they fall within the FFTOD study area.

**Proposed Zoning Changes:** I have some concerns regarding rezoning of residential areas within the TOD study area; so what is proposed is rezoning of residential areas in order to allow increased density and number of dwelling units per property. I am concerned about this because 1) Florence-Firestone is already a dense neighborhood 2) this would exacerbate current parking issues (double parking and lack of parking availability, to add, we need a traffic and parking study) 3) considering that there isn't a current budget for outreach (through mailers) to all residents about these important meetings where these decisions are being made, I am concerned that there won't be a budget for future outreach to all residents with information about zoning changes to their property. Those who will be more aware and knowledgeable of zoning changes in Florence-Firestone will likely be outside developers and property buyers and I fear this will trigger an increased interest in the neighborhood leading to prey on vulnerable residents and their homes. Also, homeowners may not have the resources/money to be able to convert their single-family home into a duplex/triplex/etc. Additionally, renters are at risk of being displaced by landlords seeking to redevelop their properties and attract new renters (who they could charge higher rent to). In the long-term, I fear this may exacerbate the housing crisis and lead to displacement in Florence-Firestone. I understand that the FFTOD Specific Plan is not a development project itself, but the proposed zoning changes will set a domino effect of changes leading to displacement if adequate protections for renters and homeowners are not set in place.

Best regards,
Yanel Saenz

# APPENDIX D

# ENERGY CALCULATIONS

**FFTOD Specific Plan - Energy Calculations**

**Operational Energy Consumption**

*Calculations based on the modeling methodology and GHG Emissions. Please refer to the Air Quality and Greenhouse Gas Emissions Appendix for additional details.*

**Estimated Annual Operational Energy Demand**

| | Energy Consumption | Unit | Annual Energy Consumption (MMBTU/year) |
|---|---|---|---|
| Residential Infrastructure Operational Demand | | | |
| Electrical | 46,414,560 | kWh/year | 158,373 |
| Natural Gas | 109,793,129 | kBTU/year | 109,793 |
| ***Subtotal*** | | | ***268,166*** |
| Non-Residential Infrastructure Operational Demand | | | |
| Electrical | 17,210,379 | kWh/year | 58,724 |
| Natural Gas | 15,664,539 | kBTU/year | 15,665 |
| ***Subtotal*** | | | ***74,389*** |
| | | Total | 342,555 |
| Transportation Energy Demand | | | |
| Gasoline | 5,246,771 | Gallons/year | 655,846 |
| Diesel Fuel | 1,247,322 | Gallons/year' | 172,249 |
| ***Subtotal*** | | | ***828,096*** |
| **Total** | | | |
| Notes: kWh = kilowatt-hours; kBtu = thousand British thermal unit | | | |
| Source: AECOM 2021 | | | |

| **Conversion Factors** | | |
|---|---|---|
| **Category** | **Amount** | **Units** |
| Electricity (Energy Content) | 3412.141633 | Btu/Kw |
| Diesel (heat content) | 5.8 | MMBtu/barrel |
| Motor Gasoline | 5.25 | MMBtu/barrel |
| Natural Gas | 0.1 | MMBtu/therm |
| Gallons per Barrel | 42 | gallons/barrel |

https://www.theclimateregistry.org/wp-content/uploads/2020/04/The-Climate-Registry-2020-Default-Emission-Factor-Document.pdf

**Energy Demand by Land Use (CalEEMod output data)**

| Land Use | Electricity Demand (kWh/year) | Natrual Gas Demand (kBTU/year) |
|---|---|---|
| Apartments Low Rise | 577711 | 1.97E+06 |
| Apartments Mid Rise | 1.15E+06 | 1.42E+06 |
| Apartments Mid Rise | 2.50E+06 | 2.71E+06 |
| Apartments Mid Rise | 233666 | 5.88E+06 |
| Apartments Mid Rise | 4.13E+07 | 549659 |
| Apartments Mid Rise | 605233 | 9.73E+07 |
| High Turnover (Sit Down Restaurant) | 1.80E+06 | 3.34E+06 |
| High Turnover (Sit Down Restaurant) | 627206 | 9.60E+06 |
| Office Park | 1.29E+06 | 127591 |
| Office Park | 178285 | 19177 |
| Office Park | 26796.3 | 920084 |
| Strip Mall | 1.31E+07 | 1.63E+06 |
| Strip Mall | 189452 | 23627.1 |
| **Total** | **63,624,939** | **125,457,668** |

**Transportation Energy Consumption**

| | Annual VMT | Fuel Consumption (gallons per year) |
|---|---|---|
| **Total** | 192,470,815.20 | |
| **Gasoline** | 175,497,626.57 | 5,246,770.63 |
| **Diesel** | 16,973,188.63 | 1,247,322.32 |

| Fuel | % VMT by Fuel Type | Average Fuel Consumption per VMT |
|---|---|---|
| Gasoline | 91% | 0.029896533 |
| Diesel | 9% | 0.073487802 |

| | | | % Fleet Mix | | Weighted Average % VMT | |
|---|---|---|---|---|---|---|
| **Land Use** | **VMT** | **% VMT** | **Cars & Light-Duty Trucks (assumed gas)** | **Other (assumed diesel)** | **Gasoline** | **Diesel** |
| **All Vehicles (Except Trucks)** | 176702260.5 | 0.918073009 | 99% | 1% | 91% | 1% |
| **Trucks** | 15768554.72 | 0.081926991 | 0% | 100% | 0% | 8% |
| **Total** | 192470815.2 | 1 | | | 91% | 9% |

**Construction Energy Consumption**

*Calculations based on the modeling methodology and GHG Emissions. Please refer to the Air Quality and Greenhouse Gas Emissions Appendix for additional details.*

**Maximum Annual Construction Scenario**

| Phase | Source | MT $CO_2e$/yr [a] | Fuel Type | Emission Factor (MT $CO_2$/gallon) [b] | Gallons/year |
|---|---|---|---|---|---|
| *Demolition* | Offroad Equip | 444.98 | Diesel | 0.01016 | 43,797 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 17.84 | Gas | 0.008887 | 2,008 |
| *Site Prep* | Offroad Equip | 438.23 | Diesel | 0.01016 | 43,133 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 21.41 | Gas | 0.008887 | 2,409 |
| *Grading* | Offroad Equip | 714.68 | Diesel | 0.01016 | 70,343 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 23.79 | Gas | 0.008887 | 2,677 |
| *Building Construction* | Offroad Equip | 303.05 | Diesel | 0.01016 | 29,827 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 963.94 | Diesel | 0.01016 | 94,876 |
| | Worker | 2707.47 | Gas | 0.008887 | 304,655 |
| *Paving* | Offroad Equip | 262.46 | Diesel | 0.01016 | 25,833 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 17.84 | Gas | 0.008887 | 2,008 |
| *Architectural Coating* | Offroad Equip | 33.25 | Diesel | 0.01016 | 3,272 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 541.26 | Gas | 0.008887 | 60,904 |
| | | **Total** | | **Diesel** | **311,081** |
| | | | | **Gasoline** | **374,662** |

Construction Buildout Period (years): 15

| Factor: | MT/gallon |
|---|---|
| Diesel | 1.02E-02 |
| Gasoline | 8.89E-03 |

**Full Build-Out Scenario**

| Phase | Source | MT $CO_2e$ [a] | Fuel Type | Emission Factor (MT $CO_2$/gallon) [b] | Gallons |
|---|---|---|---|---|---|
| *Demolition* | Offroad Equip | 1779.90 | Diesel | 0.01016 | 175,187 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 71.37 | Gas | 0.008887 | 8,031 |
| *Site Prep* | Offroad Equip | 1752.91 | Diesel | 0.01016 | 172,530 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 85.65 | Gas | 0.008887 | 9,638 |
| *Grading* | Offroad Equip | 2858.73 | Diesel | 0.01016 | 281,371 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 95.17 | Gas | 0.008887 | 10,708 |
| *Building Construction* | Offroad Equip | 1212.19 | Diesel | 0.01016 | 119,310 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 3855.76 | Diesel | 0.01016 | 379,504 |
| | Worker | 10829.88 | Gas | 0.008887 | 1,218,620 |
| *Paving* | Offroad Equip | 1049.85 | Diesel | 0.01016 | 103,332 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 71.37 | Gas | 0.008887 | 8,031 |
| *Architectural Coating* | Offroad Equip | 132.99 | Diesel | 0.01016 | 13,089 |
| | Hauling | 0.00 | Diesel | 0.01016 | - |
| | Vendor | 0.00 | Diesel | 0.01016 | - |
| | Worker | 2165.02 | Gas | 0.008887 | 243,617 |
| | | **Total Demand** | | **Diesel** | **1,244,323** |
| | | | | **Gasoline** | **1,498,646** |
| | | **Average Annual Demands (over 13 Year Construction Duration)** | | **Diesel** | **82,954.88** |
| | | | | **Gasoline** | **99,909.74** |

Notes:
Total construction demand determined based upon 4 times the maximum annual construction year (assumed to be 25% of total buildout)
Sources:

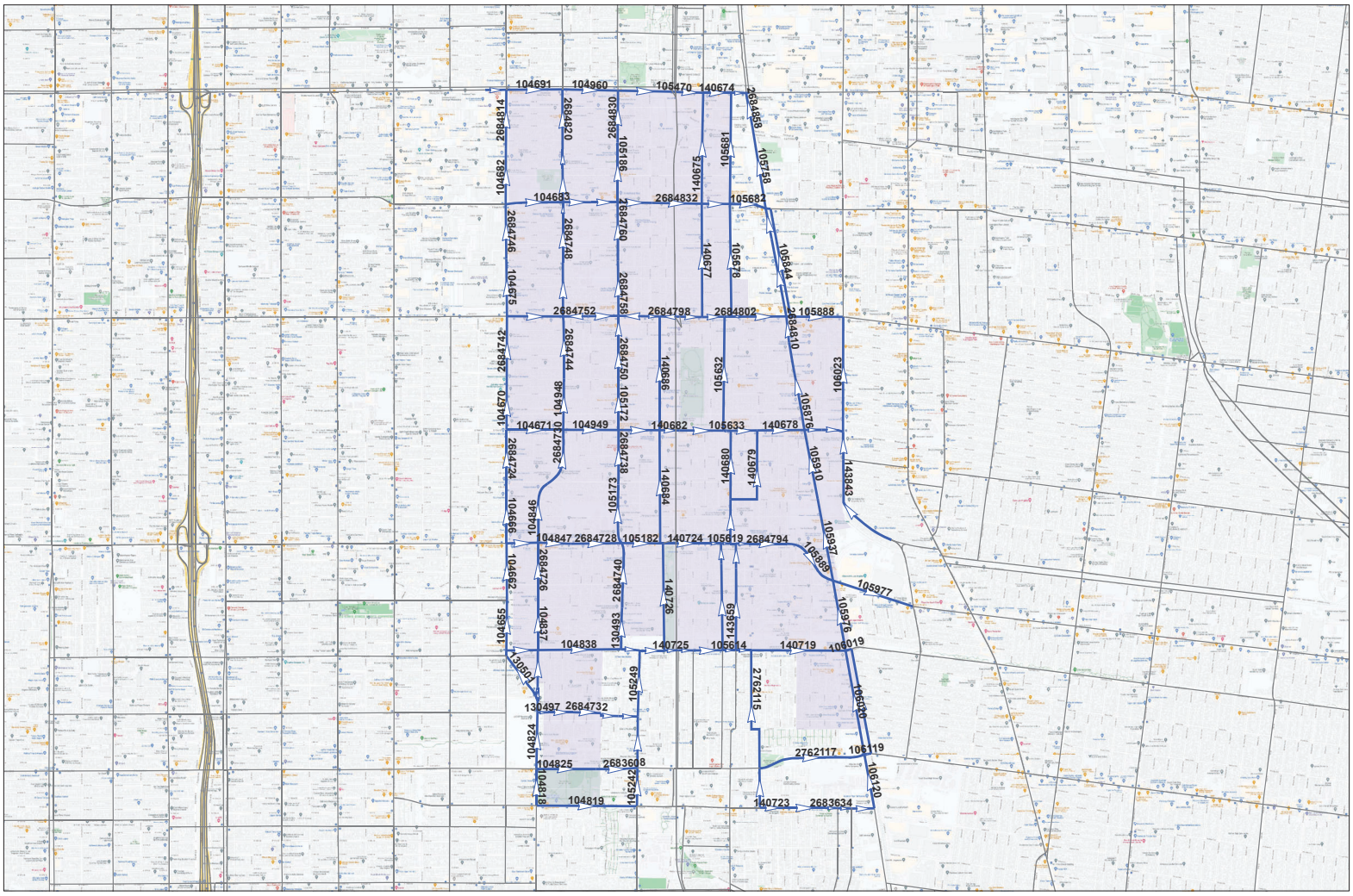
Source: EMFAC2017 (v1.0.3) Emissions Inventory
Region Type: Sub-Area
Region: Los Angeles (SC)
Calendar Year: 2035
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Units: miles/day for VMT, trips/day for Trips, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

| Region | Calendar Year | Vehicle Category | Model Year | Speed | Fuel | Population | VMT | Trips | Fuel Consumption |
|---|---|---|---|---|---|---|---|---|---|
| Los Angeles (SC) | 2035 | HHDT | Aggregate | Aggregate | Gasoline | 62.32503727 | 7810.784516 | 1246.999346 | 1.494503654 |
| Los Angeles (SC) | 2035 | HHDT | Aggregate | Aggregate | Diesel | 62664.8294 | 8342128.247 | 649825.1014 | 945.5811541 |
| Los Angeles (SC) | 2035 | HHDT | Aggregate | Aggregate | Natural Ga | 4413.877605 | 179918.3279 | 17214.12266 | 65.8567014 |
| Los Angeles (SC) | 2035 | LDA | Aggregate | Aggregate | Gasoline | 4380098.737 | 145198346.6 | 20604105.71 | 3708.28687 |
| Los Angeles (SC) | 2035 | LDA | Aggregate | Aggregate | Diesel | 51569.47824 | 1760191.501 | 245497.4715 | 29.69644464 |
| Los Angeles (SC) | 2035 | LDA | Aggregate | Aggregate | Electricity | 245891.2596 | 8863110.902 | 1187725.565 | 0 |
| Los Angeles (SC) | 2035 | LDT1 | Aggregate | Aggregate | Gasoline | 611267.6579 | 19615898.31 | 2825549.556 | 590.0348453 |
| Los Angeles (SC) | 2035 | LDT1 | Aggregate | Aggregate | Diesel | 97.49751019 | 2950.782015 | 431.7356541 | 0.103317692 |
| Los Angeles (SC) | 2035 | LDT1 | Aggregate | Aggregate | Electricity | 19062.46851 | 683909.898 | 91952.69945 | 0 |
| Los Angeles (SC) | 2035 | LDT2 | Aggregate | Aggregate | Gasoline | 1689041.252 | 55377471.11 | 7889482.462 | 1655.656806 |
| Los Angeles (SC) | 2035 | LDT2 | Aggregate | Aggregate | Diesel | 16515.29316 | 555187.1731 | 78367.95688 | 12.57431311 |
| Los Angeles (SC) | 2035 | LDT2 | Aggregate | Aggregate | Electricity | 65313.10893 | 1624534.387 | 315252.1324 | 0 |
| Los Angeles (SC) | 2035 | LHDT1 | Aggregate | Aggregate | Gasoline | 111104.2747 | 3694388.358 | 1655288.147 | 301.1541718 |
| Los Angeles (SC) | 2035 | LHDT1 | Aggregate | Aggregate | Diesel | 116872.8886 | 3987832.31 | 1470113.912 | 156.0510828 |
| Los Angeles (SC) | 2035 | LHDT2 | Aggregate | Aggregate | Gasoline | 20007.7898 | 639711.8381 | 298086.2564 | 60.06791512 |
| Los Angeles (SC) | 2035 | LHDT2 | Aggregate | Aggregate | Diesel | 47408.74847 | 1557038.117 | 596342.4156 | 67.74004186 |
| Los Angeles (SC) | 2035 | MCY | Aggregate | Aggregate | Gasoline | 249265.9253 | 1425321.535 | 498531.8505 | 40.61636117 |
| Los Angeles (SC) | 2035 | MDV | Aggregate | Aggregate | Gasoline | 1073086.595 | 33147770.99 | 4985803.83 | 1215.887559 |
| Los Angeles (SC) | 2035 | MDV | Aggregate | Aggregate | Diesel | 36227.84892 | 1150224.061 | 171538.5048 | 33.73736907 |
| Los Angeles (SC) | 2035 | MDV | Aggregate | Aggregate | Electricity | 45969.28046 | 1155872.026 | 222725.0704 | 0 |
| Los Angeles (SC) | 2035 | MH | Aggregate | Aggregate | Gasoline | 20828.14385 | 198353.9991 | 2083.647511 | 32.43518762 |
| Los Angeles (SC) | 2035 | MH | Aggregate | Aggregate | Diesel | 9316.060549 | 82345.22241 | 931.6060549 | 6.718644394 |
| Los Angeles (SC) | 2035 | MHDT | Aggregate | Aggregate | Gasoline | 16961.24935 | 855067.6287 | 339360.677 | 141.0588862 |
| Los Angeles (SC) | 2035 | MHDT | Aggregate | Aggregate | Diesel | 89007.40772 | 5072401.132 | 912925.3543 | 390.3831973 |
| Los Angeles (SC) | 2035 | OBUS | Aggregate | Aggregate | Gasoline | 4036.941021 | 141059.8306 | 80771.11596 | 23.50003181 |
| Los Angeles (SC) | 2035 | OBUS | Aggregate | Aggregate | Diesel | 4370.900852 | 296850.416 | 42358.05121 | 29.09600137 |
| Los Angeles (SC) | 2035 | SBUS | Aggregate | Aggregate | Gasoline | 2645.199426 | 93651.87911 | 10580.7977 | 9.054183786 |
| Los Angeles (SC) | 2035 | SBUS | Aggregate | Aggregate | Diesel | 3933.939901 | 125336.1673 | 45397.12104 | 13.57635407 |
| Los Angeles (SC) | 2035 | UBUS | Aggregate | Aggregate | Gasoline | 496.7846365 | 35519.7125 | 1987.138546 | 6.717969468 |
| Los Angeles (SC) | 2035 | UBUS | Aggregate | Aggregate | Diesel | 0 | 0 | 0 | 0 |
| Los Angeles (SC) | 2035 | UBUS | Aggregate | Aggregate | Natural Ga | 4469.917784 | 473074.0734 | 17879.67114 | 120.179153 |

| Fuel Type | VMT By Fuel Type | Fuel Consumption by Fuel Type | Average Fuel Consumption / VMT |
|---|---|---|---|
| **Gas** | 260430372.5 | 7785.965292 | 0.029896533 |
| **DSL** | 22932485.13 | 1685.25792 | 0.073487802 |
| **Elec** | 12327427.21 | 0 | 0 |
| **NG** | 652992.4014 | 186.0358544 | 0.284897426 |
| **Total** | 296343277.3 | 9657.259066 | |

# APPENDIX E

# NOISE CALCULATIONS


104691
104960
105470
140674
2684814
2684820
2684830
105196
140675
105681
105758
104682
104683
2684832
105682
2684746
2684748
2684750
140677
105678
105844
104675
2684752
2684798
2684802
105888
2684742
2684744
2684750
140686
105632
106023
104670
104671
104949
140682
105633
140678
105876
2684724
2684726
2684738
140680
140679
105910
143843
104666
105173
140684
104847
2684728
105182
140724
105619
2684794
105937
105977
104662
2684726
2684740
140726
105976
104655
104837
130493
143959
104838
140725
105614
140719
106019
130501
105249
2762115
130497
2684732
104824
104825
2683608
2762117
106119
106120
104818
105242
104819
140723
2683634

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# Traffic Volumes per Period and Vehicle Type

| | | Future No-Project | | | | | | | | | Future With-Project | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Daytime | | | Evening | | | Nighttime | | | Daytime | | | Evening | | | Nighttime | | |
| Link ID | Road Name | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT |
| 105612 | BANDERA ST | 889 | 23 | 59 | 0 | 0 | 0 | 0 | 0 | 0 | 944 | 30 | 75 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2684786 | BANDERA ST | 889 | 23 | 59 | 0 | 0 | 0 | 0 | 0 | 0 | 944 | 30 | 75 | 0 | 0 | 0 | 0 | 0 | 0 |
| 140680 | BELL AVE | 6050 | 38 | 74 | 436 | 0 | 2 | 73 | 0 | 0 | 6237 | 41 | 82 | 452 | 0 | 2 | 91 | 0 | 1 |
| 105660 | BELL AVE | 9325 | 53 | 104 | 740 | 1 | 3 | 187 | 2 | 2 | 9492 | 55 | 108 | 760 | 1 | 3 | 202 | 2 | 2 |
| 2676279 | CLOVIS AVE | 21088 | 149 | 271 | 1924 | 4 | 13 | 1576 | 15 | 43 | 21517 | 153 | 260 | 1943 | 4 | 13 | 1585 | 15 | 42 |
| 130493 | COMPTON AVE | 7674 | 48 | 95 | 413 | 1 | 3 | 296 | 3 | 7 | 8786 | 60 | 110 | 542 | 1 | 4 | 368 | 4 | 11 |
| 2684740 | COMPTON AVE | 7674 | 48 | 95 | 413 | 1 | 3 | 296 | 3 | 7 | 8786 | 60 | 110 | 542 | 1 | 4 | 368 | 4 | 11 |
| 2684760 | COMPTON AVE | 15062 | 133 | 210 | 647 | 2 | 6 | 656 | 5 | 18 | 15553 | 130 | 211 | 856 | 2 | 9 | 842 | 7 | 27 |
| 105186 | COMPTON AVE | 20291 | 134 | 219 | 1334 | 3 | 13 | 1392 | 12 | 40 | 20832 | 132 | 215 | 1721 | 4 | 19 | 1750 | 17 | 59 |
| 2684758 | COMPTON AVE | 15062 | 133 | 210 | 647 | 2 | 6 | 656 | 5 | 18 | 15553 | 130 | 211 | 856 | 2 | 9 | 842 | 7 | 27 |
| 2684756 | COMPTON AVE | 15565 | 84 | 131 | 671 | 1 | 4 | 560 | 4 | 10 | 17767 | 84 | 127 | 917 | 2 | 5 | 745 | 5 | 13 |
| 2684830 | COMPTON AVE | 20291 | 134 | 219 | 1334 | 3 | 13 | 1392 | 12 | 40 | 20832 | 132 | 215 | 1721 | 4 | 19 | 1750 | 17 | 59 |
| 2684750 | COMPTON AVE | 15565 | 84 | 131 | 671 | 1 | 4 | 560 | 4 | 10 | 17767 | 84 | 127 | 917 | 2 | 5 | 745 | 5 | 13 |
| 105172 | COMPTON AVE | 15565 | 84 | 131 | 671 | 1 | 4 | 560 | 4 | 10 | 17767 | 84 | 127 | 917 | 2 | 5 | 745 | 5 | 13 |
| 2684738 | COMPTON AVE | 13090 | 51 | 90 | 432 | 0 | 1 | 301 | 2 | 3 | 14007 | 60 | 101 | 525 | 1 | 2 | 351 | 2 | 4 |
| 105173 | COMPTON AVE | 13090 | 51 | 90 | 432 | 0 | 1 | 301 | 2 | 3 | 14007 | 60 | 101 | 525 | 1 | 2 | 351 | 2 | 4 |
| 105244 | COMPTON AVE | 16647 | 67 | 108 | 1215 | 2 | 7 | 1121 | 8 | 23 | 17409 | 76 | 123 | 1331 | 2 | 8 | 1185 | 10 | 26 |
| 105249 | COMPTON AVE | 11558 | 58 | 99 | 970 | 2 | 5 | 777 | 6 | 13 | 12017 | 66 | 113 | 1093 | 2 | 6 | 851 | 7 | 16 |
| 105242 | COMPTON AVE | 17499 | 69 | 110 | 1193 | 2 | 7 | 1112 | 8 | 21 | 18311 | 77 | 127 | 1306 | 2 | 8 | 1175 | 9 | 24 |
| 140679 | CROCKETT BLVD | 3274 | 16 | 30 | 304 | 0 | 0 | 113 | 2 | 2 | 3254 | 14 | 27 | 305 | 0 | 0 | 112 | 2 | 2 |
| 140706 | E 103RD ST | 9825 | 24 | 29 | 821 | 0 | 2 | 760 | 2 | 4 | 9965 | 24 | 29 | 804 | 0 | 2 | 754 | 2 | 4 |
| 104819 | E 103RD ST | 9026 | 24 | 24 | 528 | 0 | 1 | 388 | 2 | 4 | 9221 | 24 | 26 | 528 | 0 | 1 | 384 | 2 | 4 |
| 140701 | E 103RD ST | 8700 | 24 | 27 | 740 | 0 | 2 | 674 | 2 | 4 | 8825 | 22 | 27 | 729 | 0 | 2 | 669 | 2 | 4 |
| 105858 | E 103RD ST | 8881 | 24 | 27 | 742 | 0 | 2 | 675 | 2 | 4 | 8989 | 23 | 27 | 731 | 0 | 2 | 671 | 2 | 4 |
| 2683634 | E 103RD ST | 8881 | 24 | 27 | 742 | 0 | 2 | 675 | 2 | 4 | 8989 | 23 | 27 | 731 | 0 | 2 | 671 | 2 | 4 |
| 140723 | E 103RD ST | 10908 | 29 | 31 | 774 | 0 | 2 | 580 | 4 | 8 | 11047 | 26 | 29 | 786 | 0 | 2 | 583 | 4 | 8 |
| 140719 | E 92ND ST | 11386 | 31 | 53 | 729 | 0 | 2 | 724 | 4 | 6 | 11335 | 30 | 55 | 716 | 0 | 2 | 711 | 4 | 6 |
| 106019 | E 92ND ST | 13134 | 40 | 73 | 1079 | 2 | 3 | 934 | 4 | 9 | 12998 | 38 | 74 | 1048 | 1 | 3 | 918 | 4 | 9 |
| 104838 | E 92ND ST | 7259 | 27 | 48 | 378 | 0 | 1 | 258 | 2 | 2 | 7107 | 29 | 53 | 366 | 0 | 1 | 249 | 2 | 2 |
| 104657 | E 92ND ST | 6181 | 16 | 32 | 581 | 0 | 1 | 541 | 2 | 2 | 5814 | 16 | 34 | 529 | 0 | 1 | 483 | 2 | 2 |
| 140725 | E 92ND ST | 11438 | 32 | 49 | 772 | 0 | 2 | 559 | 2 | 4 | 11591 | 32 | 51 | 772 | 0 | 2 | 556 | 2 | 4 |
| 105614 | E 92ND ST | 11701 | 32 | 49 | 772 | 0 | 2 | 559 | 2 | 4 | 11686 | 32 | 51 | 772 | 0 | 2 | 556 | 2 | 4 |
| 105456 | E 92ND ST | 11437 | 32 | 49 | 772 | 0 | 2 | 559 | 2 | 4 | 11589 | 32 | 51 | 772 | 0 | 2 | 556 | 2 | 4 |
| 140717 | E 92ND ST | 11437 | 32 | 49 | 772 | 0 | 2 | 559 | 2 | 4 | 11589 | 32 | 51 | 772 | 0 | 2 | 556 | 2 | 4 |

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| | | Future No-Project | | | | | | | | | Future With-Project | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Daytime | | | Evening | | | Nighttime | | | Daytime | | | Evening | | | Nighttime | | |
| Link ID | Road Name | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT |
| 143662 | E 92ND ST | 13113 | 33 | 56 | 763 | 0 | 2 | 733 | 4 | 6 | 13086 | 34 | 58 | 756 | 0 | 2 | 720 | 4 | 6 |
| 105267 | E 92ND ST | 11228 | 33 | 49 | 837 | 0 | 2 | 634 | 4 | 6 | 11012 | 33 | 52 | 825 | 1 | 2 | 625 | 4 | 6 |
| 105171 | E 92ND ST | 14688 | 65 | 123 | 905 | 2 | 5 | 670 | 5 | 13 | 15464 | 76 | 140 | 1018 | 2 | 6 | 739 | 6 | 15 |
| 2684722 | E 96TH ST | 7090 | 11 | 12 | 340 | 0 | 1 | 366 | 1 | 2 | 7081 | 12 | 12 | 338 | 0 | 1 | 364 | 1 | 2 |
| 130497 | E 96TH ST | 7090 | 11 | 12 | 340 | 0 | 1 | 366 | 1 | 2 | 7081 | 12 | 12 | 338 | 0 | 1 | 364 | 1 | 2 |
| 2684732 | E 96TH ST | 7090 | 11 | 12 | 340 | 0 | 1 | 366 | 1 | 2 | 7081 | 12 | 12 | 338 | 0 | 1 | 364 | 1 | 2 |
| 2684734 | E 96TH ST | 7090 | 11 | 12 | 340 | 0 | 1 | 366 | 1 | 2 | 7081 | 12 | 12 | 338 | 0 | 1 | 364 | 1 | 2 |
| 2684736 | E 96TH ST | 7090 | 11 | 12 | 340 | 0 | 1 | 366 | 1 | 2 | 7081 | 12 | 12 | 338 | 0 | 1 | 364 | 1 | 2 |
| 2762115 | E 97TH ST | 1725 | 2 | 5 | 32 | 0 | 0 | 10 | 0 | 0 | 1748 | 2 | 5 | 40 | 0 | 0 | 11 | 0 | 0 |
| 2762114 | E 97TH ST | 5505 | 10 | 10 | 352 | 0 | 1 | 410 | 4 | 6 | 5592 | 11 | 12 | 366 | 0 | 1 | 405 | 4 | 6 |
| 104825 | E CENTURY BLVD | 11077 | 26 | 74 | 857 | 0 | 1 | 627 | 3 | 6 | 11197 | 26 | 77 | 850 | 0 | 1 | 619 | 3 | 6 |
| 2683608 | E CENTURY BLVD | 11077 | 26 | 74 | 857 | 0 | 1 | 627 | 3 | 6 | 11197 | 26 | 77 | 850 | 0 | 1 | 619 | 3 | 6 |
| 2762117 | E CENTURY BLVD | 13672 | 28 | 76 | 1015 | 1 | 3 | 943 | 6 | 10 | 13729 | 31 | 82 | 1012 | 1 | 2 | 930 | 6 | 10 |
| 2684752 | E FLORENCE AVE | 29898 | 197 | 281 | 2882 | 5 | 16 | 3260 | 29 | 62 | 30356 | 190 | 260 | 2627 | 5 | 16 | 3319 | 31 | 64 |
| 104676 | E FLORENCE AVE | 31018 | 174 | 252 | 2935 | 6 | 15 | 3079 | 29 | 63 | 31738 | 167 | 231 | 2828 | 6 | 16 | 3295 | 32 | 67 |
| 2684798 | E FLORENCE AVE | 31213 | 166 | 226 | 3381 | 6 | 17 | 3794 | 33 | 73 | 32590 | 153 | 197 | 3532 | 6 | 18 | 4331 | 38 | 85 |
| 2684764 | E FLORENCE AVE | 29028 | 150 | 199 | 3328 | 6 | 16 | 3728 | 33 | 73 | 30454 | 134 | 170 | 3493 | 6 | 17 | 4266 | 38 | 85 |
| 2684766 | E FLORENCE AVE | 29028 | 150 | 199 | 3328 | 6 | 16 | 3728 | 33 | 73 | 30454 | 134 | 170 | 3493 | 6 | 17 | 4266 | 38 | 85 |
| 2684800 | E FLORENCE AVE | 31213 | 166 | 226 | 3381 | 6 | 17 | 3794 | 33 | 73 | 32590 | 153 | 197 | 3532 | 6 | 18 | 4331 | 38 | 85 |
| 105569 | E FLORENCE AVE | 28528 | 145 | 195 | 3357 | 6 | 16 | 3695 | 32 | 71 | 29888 | 131 | 160 | 3468 | 6 | 18 | 4182 | 37 | 83 |
| 2684754 | E FLORENCE AVE | 29898 | 197 | 281 | 2882 | 5 | 16 | 3260 | 29 | 62 | 30356 | 190 | 260 | 2627 | 5 | 16 | 3319 | 31 | 64 |
| 2684804 | E FLORENCE AVE | 26223 | 125 | 168 | 3425 | 6 | 19 | 3922 | 35 | 81 | 27440 | 118 | 151 | 3516 | 6 | 21 | 4409 | 40 | 99 |
| 105635 | E FLORENCE AVE | 36735 | 189 | 272 | 3994 | 7 | 21 | 4108 | 37 | 85 | 39101 | 182 | 255 | 4195 | 8 | 24 | 4661 | 43 | 103 |
| 2684802 | E FLORENCE AVE | 26223 | 125 | 168 | 3425 | 6 | 19 | 3922 | 35 | 81 | 27440 | 118 | 151 | 3516 | 6 | 21 | 4409 | 40 | 99 |
| 105888 | E FLORENCE AVE | 37442 | 135 | 149 | 4272 | 6 | 18 | 4953 | 40 | 91 | 38371 | 132 | 143 | 4365 | 6 | 19 | 5283 | 45 | 103 |
| 105875 | E FLORENCE AVE | 30462 | 150 | 198 | 3675 | 8 | 23 | 4920 | 45 | 103 | 32301 | 143 | 183 | 3380 | 8 | 26 | 5263 | 49 | 115 |
| 140676 | E GAGE AVE | 25262 | 172 | 289 | 1433 | 4 | 12 | 702 | 11 | 34 | 26129 | 185 | 322 | 1768 | 4 | 14 | 846 | 12 | 37 |
| 105682 | E GAGE AVE | 29768 | 219 | 401 | 1514 | 4 | 13 | 763 | 12 | 37 | 31084 | 227 | 431 | 1797 | 4 | 16 | 932 | 14 | 43 |
| 105832 | E GAGE AVE | 34122 | 210 | 332 | 2580 | 5 | 17 | 1543 | 19 | 55 | 35333 | 224 | 358 | 2784 | 5 | 20 | 1604 | 20 | 53 |
| 104956 | E GAGE AVE | 19910 | 111 | 184 | 1473 | 4 | 13 | 903 | 13 | 46 | 19530 | 121 | 202 | 1688 | 4 | 16 | 974 | 16 | 54 |
| 104683 | E GAGE AVE | 23975 | 196 | 351 | 1832 | 4 | 15 | 1394 | 17 | 54 | 25646 | 179 | 301 | 2310 | 5 | 18 | 1824 | 22 | 67 |
| 105187 | E GAGE AVE | 21081 | 123 | 221 | 1349 | 3 | 11 | 645 | 10 | 33 | 22322 | 149 | 268 | 1635 | 3 | 13 | 733 | 11 | 35 |
| 2684826 | E GAGE AVE | 19910 | 111 | 184 | 1473 | 4 | 13 | 903 | 13 | 46 | 19530 | 121 | 202 | 1688 | 4 | 16 | 974 | 16 | 54 |
| 2684832 | E GAGE AVE | 21081 | 123 | 221 | 1349 | 3 | 11 | 645 | 10 | 33 | 22322 | 149 | 268 | 1635 | 3 | 13 | 733 | 11 | 35 |
| 140674 | E SLAUSON AVE | 32203 | 428 | 833 | 3215 | 21 | 79 | 3977 | 95 | 262 | 32486 | 420 | 811 | 3203 | 21 | 77 | 4026 | 97 | 267 |
| 105483 | E SLAUSON AVE | 31678 | 450 | 859 | 3277 | 21 | 79 | 3935 | 95 | 262 | 31211 | 425 | 817 | 3270 | 21 | 77 | 3989 | 97 | 267 |
| 105692 | E SLAUSON AVE | 39215 | 480 | 935 | 3868 | 23 | 96 | 4446 | 108 | 325 | 40495 | 500 | 974 | 4142 | 25 | 103 | 4752 | 117 | 361 |

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| | | Future No-Project | | | | | | | | | Future With-Project | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Daytime | | | Evening | | | Nighttime | | | Daytime | | | Evening | | | Nighttime | | |
| Link ID | Road Name | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT |
| 105757 | E SLAUSON AVE | 36991 | 512 | 959 | 4440 | 27 | 100 | 4075 | 122 | 355 | 38466 | 528 | 990 | 4464 | 27 | 101 | 4052 | 128 | 370 |
| 104691 | E SLAUSON AVE | 29045 | 471 | 875 | 3421 | 22 | 89 | 4037 | 101 | 296 | 30429 | 464 | 845 | 3432 | 21 | 85 | 4144 | 102 | 300 |
| 2684822 | E SLAUSON AVE | 28274 | 394 | 723 | 3170 | 19 | 77 | 4617 | 113 | 336 | 29677 | 408 | 735 | 3340 | 20 | 79 | 4719 | 116 | 345 |
| 104960 | E SLAUSON AVE | 28053 | 555 | 1051 | 3245 | 22 | 89 | 3861 | 99 | 291 | 27856 | 525 | 963 | 3225 | 21 | 85 | 3975 | 100 | 296 |
| 105195 | E SLAUSON AVE | 31154 | 496 | 974 | 4259 | 23 | 97 | 5476 | 112 | 337 | 32656 | 464 | 901 | 4337 | 24 | 98 | 5936 | 121 | 367 |
| 105470 | E SLAUSON AVE | 34386 | 517 | 998 | 3922 | 23 | 95 | 4812 | 107 | 317 | 36321 | 491 | 945 | 4223 | 23 | 96 | 5216 | 115 | 340 |
| 143659 | ELM ST | 8612 | 32 | 45 | 652 | 1 | 2 | 112 | 0 | 2 | 8627 | 26 | 33 | 666 | 1 | 3 | 128 | 0 | 2 |
| 2684792 | ELM ST | 8612 | 32 | 45 | 652 | 1 | 2 | 112 | 0 | 2 | 8627 | 26 | 33 | 666 | 1 | 3 | 128 | 0 | 2 |
| 105977 | FIRESTONE BLVD | 41734 | 140 | 202 | 3211 | 5 | 12 | 4105 | 30 | 85 | 43092 | 146 | 216 | 3380 | 5 | 14 | 4416 | 33 | 98 |
| 105889 | FIRESTONE BLVD | 44898 | 199 | 351 | 2808 | 5 | 25 | 1813 | 14 | 52 | 46171 | 207 | 386 | 2980 | 6 | 28 | 1888 | 16 | 58 |
| 2684794 | FIRESTONE BLVD | 41204 | 177 | 258 | 2460 | 4 | 13 | 1495 | 10 | 25 | 42305 | 180 | 268 | 2622 | 5 | 14 | 1550 | 10 | 27 |
| 143661 | FIRESTONE BLVD | 41204 | 177 | 258 | 2460 | 4 | 13 | 1495 | 10 | 25 | 42305 | 180 | 268 | 2622 | 5 | 14 | 1550 | 10 | 27 |
| 104847 | FIRESTONE BLVD | 36335 | 168 | 273 | 2667 | 5 | 21 | 1643 | 14 | 45 | 36377 | 170 | 292 | 2764 | 5 | 23 | 1637 | 14 | 49 |
| 104667 | FIRESTONE BLVD | 55860 | 194 | 292 | 4223 | 7 | 25 | 2930 | 21 | 62 | 57167 | 191 | 315 | 4592 | 7 | 28 | 3104 | 23 | 70 |
| 105182 | FIRESTONE BLVD | 48149 | 202 | 318 | 3124 | 5 | 21 | 2027 | 16 | 47 | 49570 | 210 | 345 | 3320 | 6 | 24 | 2108 | 16 | 52 |
| 2684728 | FIRESTONE BLVD | 36335 | 168 | 273 | 2667 | 5 | 21 | 1643 | 14 | 45 | 36377 | 170 | 292 | 2764 | 5 | 23 | 1637 | 14 | 49 |
| 140724 | FIRESTONE BLVD | 46936 | 202 | 315 | 3063 | 5 | 21 | 1981 | 16 | 48 | 48500 | 209 | 341 | 3243 | 6 | 24 | 2056 | 16 | 53 |
| 140683 | FIRESTONE BLVD | 50205 | 215 | 326 | 3135 | 6 | 21 | 2041 | 16 | 47 | 52008 | 221 | 353 | 3324 | 6 | 24 | 2119 | 16 | 51 |
| 105661 | FIRESTONE BLVD | 54292 | 231 | 361 | 3496 | 6 | 23 | 1914 | 16 | 47 | 55800 | 232 | 371 | 3685 | 6 | 26 | 2000 | 16 | 53 |
| 105619 | FIRESTONE BLVD | 47823 | 226 | 374 | 3063 | 5 | 21 | 1981 | 16 | 48 | 49416 | 240 | 416 | 3243 | 6 | 24 | 2056 | 16 | 53 |
| 2684790 | FIRESTONE BLVD | 46936 | 202 | 315 | 3063 | 5 | 21 | 1981 | 16 | 48 | 48500 | 209 | 341 | 3243 | 6 | 24 | 2056 | 16 | 53 |
| 140675 | HOLMES AVE | 7088 | 43 | 63 | 167 | 0 | 0 | 55 | 0 | 0 | 7355 | 44 | 70 | 161 | 0 | 0 | 50 | 0 | 0 |
| 140677 | HOLMES AVE | 7451 | 49 | 72 | 249 | 0 | 1 | 110 | 0 | 2 | 7782 | 48 | 72 | 293 | 0 | 1 | 163 | 2 | 2 |
| 104837 | HOOPER AVE | 6965 | 38 | 55 | 466 | 2 | 4 | 321 | 3 | 6 | 7748 | 40 | 60 | 528 | 2 | 5 | 361 | 3 | 7 |
| 130498 | HOOPER AVE | 7337 | 46 | 70 | 324 | 2 | 4 | 235 | 3 | 5 | 8209 | 48 | 75 | 404 | 2 | 5 | 283 | 3 | 7 |
| 2684748 | HOOPER AVE | 8615 | 50 | 86 | 280 | 0 | 1 | 75 | 0 | 0 | 8738 | 64 | 105 | 346 | 0 | 2 | 95 | 0 | 0 |
| 104955 | HOOPER AVE | 19687 | 152 | 271 | 646 | 0 | 3 | 114 | 0 | 1 | 20542 | 129 | 216 | 984 | 1 | 6 | 228 | 1 | 2 |
| 2684816 | HOOPER AVE | 8615 | 50 | 86 | 280 | 0 | 1 | 75 | 0 | 0 | 8738 | 64 | 105 | 346 | 0 | 2 | 95 | 0 | 0 |
| 2684744 | HOOPER AVE | 15440 | 95 | 137 | 503 | 0 | 3 | 568 | 3 | 5 | 16821 | 112 | 156 | 608 | 2 | 5 | 634 | 3 | 7 |
| 104953 | HOOPER AVE | 8615 | 50 | 86 | 280 | 0 | 1 | 75 | 0 | 0 | 8738 | 64 | 105 | 346 | 0 | 2 | 95 | 0 | 0 |
| 2684820 | HOOPER AVE | 19687 | 152 | 271 | 646 | 0 | 3 | 114 | 0 | 1 | 20542 | 129 | 216 | 984 | 1 | 6 | 228 | 1 | 2 |
| 2684818 | HOOPER AVE | 19687 | 152 | 271 | 646 | 0 | 3 | 114 | 0 | 1 | 20542 | 129 | 216 | 984 | 1 | 6 | 228 | 1 | 2 |
| 2684730 | HOOPER AVE | 19038 | 45 | 56 | 1282 | 2 | 6 | 870 | 5 | 11 | 19815 | 37 | 58 | 1498 | 2 | 7 | 971 | 6 | 13 |
| 2684726 | HOOPER AVE | 6965 | 38 | 55 | 466 | 2 | 4 | 321 | 3 | 6 | 7748 | 40 | 60 | 528 | 2 | 5 | 361 | 3 | 7 |
| 104846 | HOOPER AVE | 19038 | 45 | 56 | 1282 | 2 | 6 | 870 | 5 | 11 | 19815 | 37 | 58 | 1498 | 2 | 7 | 971 | 6 | 13 |
| 104948 | HOOPER AVE | 15440 | 95 | 137 | 503 | 0 | 3 | 568 | 3 | 5 | 16821 | 112 | 156 | 608 | 2 | 5 | 634 | 3 | 7 |
| 130500 | HOOPER AVE | 5217 | 46 | 70 | 324 | 2 | 4 | 235 | 3 | 5 | 6001 | 48 | 75 | 404 | 2 | 5 | 283 | 3 | 7 |

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| | | Future No-Project | | | | | | | | | Future With-Project | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Daytime | | | Evening | | | Nighttime | | | Daytime | | | Evening | | | Nighttime | | |
| Link ID | Road Name | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT |
| 104836 | HOOPER AVE | 2120 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2208 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 140726 | MAIE AVE | 4909 | 15 | 14 | 445 | 0 | 2 | 365 | 2 | 2 | 5290 | 15 | 14 | 461 | 0 | 2 | 375 | 2 | 2 |
| 140686 | MAIE AVE | 3216 | 20 | 33 | 51 | 0 | 0 | 66 | 0 | 0 | 3812 | 21 | 35 | 39 | 0 | 0 | 66 | 0 | 0 |
| 140684 | MAIE AVE | 4243 | 31 | 37 | 125 | 0 | 0 | 120 | 0 | 0 | 4700 | 27 | 37 | 128 | 0 | 0 | 119 | 0 | 0 |
| 140678 | NADEAU ST | 21076 | 105 | 151 | 1177 | 2 | 4 | 498 | 4 | 6 | 21657 | 113 | 157 | 1321 | 2 | 4 | 546 | 4 | 6 |
| 140682 | NADEAU ST | 22284 | 100 | 128 | 1176 | 2 | 4 | 639 | 4 | 8 | 23944 | 110 | 137 | 1397 | 2 | 5 | 747 | 6 | 10 |
| 105633 | NADEAU ST | 26748 | 137 | 205 | 1538 | 2 | 7 | 671 | 4 | 8 | 28273 | 150 | 222 | 1753 | 2 | 7 | 790 | 6 | 10 |
| 2684796 | NADEAU ST | 22284 | 100 | 128 | 1176 | 2 | 4 | 639 | 4 | 8 | 23944 | 110 | 137 | 1397 | 2 | 5 | 747 | 6 | 10 |
| 105670 | NADEAU ST | 17800 | 90 | 122 | 872 | 2 | 3 | 388 | 2 | 4 | 18402 | 98 | 130 | 1014 | 2 | 3 | 435 | 4 | 6 |
| 105174 | NADEAU ST | 23458 | 116 | 151 | 1103 | 2 | 4 | 585 | 4 | 8 | 25579 | 124 | 158 | 1309 | 2 | 5 | 692 | 6 | 10 |
| 2684808 | NADEAU ST | 31354 | 177 | 330 | 3012 | 6 | 21 | 1829 | 22 | 51 | 32429 | 168 | 289 | 3351 | 6 | 23 | 1911 | 22 | 52 |
| 105911 | NADEAU ST | 31354 | 177 | 330 | 3012 | 6 | 21 | 1829 | 22 | 51 | 32429 | 168 | 289 | 3351 | 6 | 23 | 1911 | 22 | 52 |
| 104671 | NADEAU ST | 14941 | 157 | 214 | 471 | 1 | 2 | 444 | 3 | 5 | 17061 | 179 | 225 | 631 | 1 | 3 | 574 | 4 | 7 |
| 104949 | NADEAU ST | 24263 | 128 | 168 | 968 | 2 | 4 | 424 | 4 | 6 | 23236 | 115 | 147 | 1108 | 2 | 4 | 465 | 4 | 6 |
| 106020 | S ALAMEDA ST | 32046 | 267 | 576 | 2952 | 13 | 55 | 2559 | 44 | 115 | 32728 | 263 | 561 | 3080 | 13 | 57 | 2618 | 45 | 119 |
| 106120 | S ALAMEDA ST | 36588 | 296 | 714 | 3230 | 13 | 59 | 2677 | 42 | 116 | 36806 | 293 | 726 | 3310 | 13 | 63 | 2684 | 44 | 120 |
| 105976 | S ALAMEDA ST | 34772 | 282 | 599 | 3293 | 13 | 57 | 3150 | 48 | 127 | 34862 | 276 | 581 | 3366 | 14 | 60 | 3156 | 49 | 131 |
| 105937 | S ALAMEDA ST | 32724 | 224 | 479 | 3851 | 12 | 50 | 5559 | 64 | 170 | 32820 | 215 | 444 | 3918 | 13 | 50 | 5800 | 68 | 180 |
| 105910 | S ALAMEDA ST | 32266 | 222 | 466 | 3719 | 12 | 44 | 5403 | 63 | 164 | 32624 | 215 | 430 | 3791 | 13 | 45 | 5647 | 67 | 174 |
| 105844 | S ALAMEDA ST | 13200 | 64 | 85 | 1543 | 3 | 9 | 591 | 7 | 13 | 13324 | 72 | 87 | 1616 | 4 | 13 | 596 | 7 | 13 |
| 2684806 | S ALAMEDA ST | 32204 | 159 | 283 | 3985 | 10 | 34 | 6835 | 71 | 187 | 31955 | 158 | 290 | 4002 | 10 | 31 | 6986 | 75 | 194 |
| 2684858 | S ALAMEDA ST | 36537 | 148 | 214 | 5031 | 12 | 36 | 7617 | 80 | 204 | 36158 | 154 | 214 | 4976 | 11 | 34 | 7658 | 81 | 205 |
| 105758 | S ALAMEDA ST | 36537 | 148 | 214 | 5031 | 12 | 36 | 7617 | 80 | 204 | 36158 | 154 | 214 | 4976 | 11 | 34 | 7658 | 81 | 205 |
| 105833 | S ALAMEDA ST | 32204 | 159 | 283 | 3985 | 10 | 34 | 6835 | 71 | 187 | 31955 | 158 | 290 | 4002 | 10 | 31 | 6986 | 75 | 194 |
| 2684810 | S ALAMEDA ST | 33482 | 178 | 313 | 4386 | 11 | 39 | 5813 | 65 | 168 | 33659 | 182 | 329 | 4540 | 12 | 40 | 6070 | 69 | 178 |
| 105876 | S ALAMEDA ST | 33482 | 178 | 313 | 4386 | 11 | 39 | 5813 | 65 | 168 | 33659 | 182 | 329 | 4540 | 12 | 40 | 6070 | 69 | 178 |
| 106055 | S ALAMEDA ST | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2684742 | S CENTRAL AVE | 25586 | 155 | 265 | 1673 | 5 | 16 | 1312 | 12 | 33 | 25944 | 150 | 239 | 1810 | 4 | 14 | 1446 | 14 | 35 |
| 104675 | S CENTRAL AVE | 26689 | 157 | 262 | 2174 | 4 | 15 | 1463 | 13 | 28 | 26876 | 135 | 211 | 2317 | 4 | 14 | 1612 | 15 | 30 |
| 104670 | S CENTRAL AVE | 25586 | 155 | 265 | 1673 | 5 | 16 | 1312 | 12 | 33 | 25944 | 150 | 239 | 1810 | 4 | 14 | 1446 | 14 | 35 |
| 2684814 | S CENTRAL AVE | 26727 | 218 | 407 | 2384 | 9 | 34 | 1439 | 18 | 52 | 27027 | 202 | 342 | 2482 | 8 | 29 | 1640 | 19 | 52 |
| 104682 | S CENTRAL AVE | 26727 | 218 | 407 | 2384 | 9 | 34 | 1439 | 18 | 52 | 27027 | 202 | 342 | 2482 | 8 | 29 | 1640 | 19 | 52 |
| 2684746 | S CENTRAL AVE | 26689 | 157 | 262 | 2174 | 4 | 15 | 1463 | 13 | 28 | 26876 | 135 | 211 | 2317 | 4 | 14 | 1612 | 15 | 30 |
| 2684724 | S CENTRAL AVE | 18277 | 199 | 337 | 1247 | 3 | 13 | 871 | 9 | 27 | 18326 | 215 | 324 | 1221 | 3 | 11 | 867 | 9 | 27 |
| 104666 | S CENTRAL AVE | 18277 | 199 | 337 | 1247 | 3 | 13 | 871 | 9 | 27 | 18326 | 215 | 324 | 1221 | 3 | 11 | 867 | 9 | 27 |
| 104662 | S CENTRAL AVE | 18438 | 139 | 255 | 1767 | 4 | 10 | 1572 | 11 | 30 | 18788 | 145 | 245 | 1742 | 4 | 10 | 1522 | 11 | 30 |
| 104655 | S CENTRAL AVE | 20207 | 145 | 261 | 1984 | 4 | 12 | 1780 | 14 | 38 | 20364 | 150 | 251 | 1956 | 4 | 12 | 1727 | 14 | 38 |

| | | Future No-Project | | | | | | | | | Future With-Project | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Daytime | | | Evening | | | Nighttime | | | Daytime | | | Evening | | | Nighttime | | |
| Link ID | Road Name | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT | Auto | MT | HT |
| 130501 | S CENTRAL AVE | 20171 | 111 | 213 | 1453 | 4 | 12 | 1249 | 13 | 40 | 19830 | 108 | 195 | 1425 | 4 | 12 | 1247 | 12 | 40 |
| 104834 | S CENTRAL AVE | 26022 | 155 | 279 | 1767 | 4 | 15 | 1474 | 14 | 43 | 26681 | 156 | 268 | 1817 | 4 | 16 | 1520 | 14 | 45 |
| 104824 | S CENTRAL AVE | 23623 | 150 | 276 | 1915 | 4 | 15 | 1579 | 15 | 45 | 23559 | 150 | 263 | 1886 | 4 | 17 | 1550 | 15 | 46 |
| 130499 | S CENTRAL AVE | 23903 | 155 | 279 | 1767 | 4 | 15 | 1474 | 14 | 43 | 24472 | 156 | 268 | 1817 | 4 | 16 | 1520 | 14 | 45 |
| 104818 | S CENTRAL AVE | 23011 | 155 | 281 | 2463 | 4 | 17 | 2314 | 19 | 60 | 22885 | 159 | 270 | 2477 | 4 | 18 | 2298 | 19 | 60 |
| 143843 | SANTA FE AVE | 7254 | 116 | 271 | 261 | 1 | 5 | 45 | 0 | 1 | 7257 | 113 | 288 | 270 | 1 | 5 | 44 | 0 | 1 |
| 106024 | SANTA FE AVE | 29550 | 248 | 469 | 2520 | 5 | 17 | 1431 | 15 | 39 | 29753 | 250 | 484 | 2563 | 5 | 17 | 1455 | 15 | 37 |
| 106023 | SANTA FE AVE | 25712 | 296 | 643 | 2501 | 7 | 28 | 1150 | 19 | 49 | 25856 | 297 | 625 | 2526 | 7 | 30 | 1198 | 19 | 51 |
| 106119 | TWEEDY BLVD | 25783 | 92 | 248 | 1792 | 2 | 8 | 1574 | 14 | 31 | 26209 | 105 | 285 | 1803 | 2 | 10 | 1574 | 14 | 32 |
| 105632 | WALNUT DR | 7021 | 49 | 96 | 398 | 0 | 2 | 32 | 0 | 0 | 7363 | 55 | 108 | 418 | 0 | 2 | 43 | 0 | 0 |
| 105678 | WILMINGTON AVE | 7591 | 57 | 106 | 317 | 0 | 2 | 16 | 0 | 0 | 7700 | 58 | 107 | 353 | 1 | 3 | 27 | 0 | 0 |
| 105681 | WILMINGTON AVE | 8455 | 57 | 133 | 343 | 1 | 2 | 2 | 0 | 0 | 8840 | 59 | 139 | 298 | 1 | 3 | 2 | 0 | 0 |

*Source: AECOM 2021, Fehr & Peers 2021*

AECOM

# Predicted Noise Level Increase Per Studied Roadway Segment

| Link ID | Road Name | Future No-Project ADT Volume | Future With-Project ADT Volume | Total Percent-Change in Daily Volume | Resulting Increase in Traffic Noise Level (dBA) |
|---|---|---|---|---|---|
| 105612 | BANDERA ST | 971 | 1049 | 8% | +0.3 |
| 2684786 | BANDERA ST | 971 | 1049 | 8% | +0.3 |
| 140680 | BELL AVE | 6673 | 6906 | 3% | +0.1 |
| 105660 | BELL AVE | 10417 | 10625 | 2% | +0.1 |
| 2676279 | CLOVIS AVE | 25083 | 25532 | 2% | +0.1 |
| 130493 | COMPTON AVE | 8540 | 9886 | 16% | +0.6 |
| 2684740 | COMPTON AVE | 8540 | 9886 | 16% | +0.6 |
| 2684760 | COMPTON AVE | 16739 | 17637 | 5% | +0.2 |
| 105186 | COMPTON AVE | 23438 | 24749 | 6% | +0.2 |
| 2684758 | COMPTON AVE | 16739 | 17637 | 5% | +0.2 |
| 2684756 | COMPTON AVE | 17030 | 19665 | 15% | +0.6 |
| 2684830 | COMPTON AVE | 23438 | 24749 | 6% | +0.2 |
| 2684750 | COMPTON AVE | 17030 | 19665 | 15% | +0.6 |
| 105172 | COMPTON AVE | 17030 | 19665 | 15% | +0.6 |
| 2684738 | COMPTON AVE | 13970 | 15053 | 8% | +0.3 |
| 105173 | COMPTON AVE | 13970 | 15053 | 8% | +0.3 |
| 105244 | COMPTON AVE | 19198 | 20170 | 5% | +0.2 |
| 105249 | COMPTON AVE | 13488 | 14171 | 5% | +0.2 |
| 105242 | COMPTON AVE | 20021 | 21039 | 5% | +0.2 |
| 140679 | CROCKETT BLVD | 3741 | 3716 | -1% | < 0.1 |
| 140706 | E 103RD ST | 11467 | 11584 | 1% | < 0.1 |
| 104819 | E 103RD ST | 9997 | 10190 | 2% | +0.1 |
| 140701 | E 103RD ST | 10173 | 10280 | 1% | < 0.1 |
| 105858 | E 103RD ST | 10357 | 10449 | 1% | < 0.1 |
| 2683634 | E 103RD ST | 10357 | 10449 | 1% | < 0.1 |
| 140723 | E 103RD ST | 12336 | 12485 | 1% | +0.1 |
| 140719 | E 92ND ST | 12935 | 12859 | -1% | < 0.1 |
| 106019 | E 92ND ST | 15278 | 15093 | -1% | -0.1 |
| 104838 | E 92ND ST | 7975 | 7809 | -2% | -0.1 |
| 104657 | E 92ND ST | 7356 | 6881 | -6% | -0.3 |
| 140725 | E 92ND ST | 12858 | 13010 | 1% | +0.1 |
| 105614 | E 92ND ST | 13121 | 13105 | <1% | < 0.1 |
| 105456 | E 92ND ST | 12857 | 13008 | 1% | +0.1 |
| 140717 | E 92ND ST | 12857 | 13008 | 1% | +0.1 |
| 143662 | E 92ND ST | 14710 | 14666 | <1% | < 0.1 |

| Link ID | Road Name | Future No-Project ADT Volume | Future With-Project ADT Volume | Total Percent-Change in Daily Volume | Resulting Increase in Traffic Noise Level (dBA) |
|---|---|---|---|---|---|
| 105267 | E 92ND ST | 12793 | 12560 | -2% | -0.1 |
| 105171 | E 92ND ST | 16476 | 17466 | 6% | +0.3 |
| 2684722 | E 96TH ST | 7823 | 7811 | <1% | < 0.1 |
| 130497 | E 96TH ST | 7823 | 7811 | <1% | < 0.1 |
| 2684732 | E 96TH ST | 7823 | 7811 | <1% | < 0.1 |
| 2684734 | E 96TH ST | 7823 | 7811 | <1% | < 0.1 |
| 2684736 | E 96TH ST | 7823 | 7811 | <1% | < 0.1 |
| 2762115 | E 97TH ST | 1774 | 1806 | 2% | +0.1 |
| 2762114 | E 97TH ST | 6298 | 6397 | 2% | +0.1 |
| 104825 | E CENTURY BLVD | 12671 | 12779 | 1% | < 0.1 |
| 2683608 | E CENTURY BLVD | 12671 | 12779 | 1% | < 0.1 |
| 2762117 | E CENTURY BLVD | 15754 | 15803 | <1% | < 0.1 |
| 2684752 | E FLORENCE AVE | 36630 | 36868 | 1% | < 0.1 |
| 104676 | E FLORENCE AVE | 37571 | 38380 | 2% | +0.1 |
| 2684798 | E FLORENCE AVE | 38909 | 40950 | 5% | +0.2 |
| 2684764 | E FLORENCE AVE | 36561 | 38663 | 6% | +0.2 |
| 2684766 | E FLORENCE AVE | 36561 | 38663 | 6% | +0.2 |
| 2684800 | E FLORENCE AVE | 38909 | 40950 | 5% | +0.2 |
| 105569 | E FLORENCE AVE | 36045 | 37973 | 5% | +0.2 |
| 2684754 | E FLORENCE AVE | 36630 | 36868 | 1% | < 0.1 |
| 2684804 | E FLORENCE AVE | 34004 | 35800 | 5% | +0.2 |
| 105635 | E FLORENCE AVE | 45448 | 48572 | 7% | +0.3 |
| 2684802 | E FLORENCE AVE | 34004 | 35800 | 5% | +0.2 |
| 105888 | E FLORENCE AVE | 47106 | 48467 | 3% | +0.1 |
| 105875 | E FLORENCE AVE | 39584 | 41468 | 5% | +0.2 |
| 140676 | E GAGE AVE | 27919 | 29317 | 5% | +0.2 |
| 105682 | E GAGE AVE | 32731 | 34548 | 6% | +0.2 |
| 105832 | E GAGE AVE | 38883 | 40401 | 4% | +0.2 |
| 104956 | E GAGE AVE | 22657 | 22605 | <1% | < 0.1 |
| 104683 | E GAGE AVE | 27838 | 30372 | 9% | +0.4 |
| 105187 | E GAGE AVE | 23476 | 25169 | 7% | +0.3 |
| 2684826 | E GAGE AVE | 22657 | 22605 | <1% | < 0.1 |
| 2684832 | E GAGE AVE | 23476 | 25169 | 7% | +0.3 |
| 140674 | E SLAUSON AVE | 41113 | 41408 | 1% | < 0.1 |
| 105483 | E SLAUSON AVE | 40656 | 40174 | -1% | -0.1 |
| 105692 | E SLAUSON AVE | 49496 | 51469 | 4% | +0.2 |
| 105757 | E SLAUSON AVE | 47581 | 49126 | 3% | +0.1 |
| 104691 | E SLAUSON AVE | 38357 | 39822 | 4% | +0.2 |

| Link ID | Road Name | Future No-Project ADT Volume | Future With-Project ADT Volume | Total Percent-Change in Daily Volume | Resulting Increase in Traffic Noise Level (dBA) |
|---|---|---|---|---|---|
| 2684822 | E SLAUSON AVE | 37723 | 39439 | 5% | +0.2 |
| 104960 | E SLAUSON AVE | 37266 | 37046 | -1% | < 0.1 |
| 105195 | E SLAUSON AVE | 42928 | 44904 | 5% | +0.2 |
| 105470 | E SLAUSON AVE | 45177 | 47770 | 6% | +0.2 |
| 143659 | ELM ST | 9458 | 9486 | <1% | < 0.1 |
| 2684792 | ELM ST | 9458 | 9486 | <1% | < 0.1 |
| 105977 | FIRESTONE BLVD | 49524 | 51400 | 4% | +0.2 |
| 105889 | FIRESTONE BLVD | 50165 | 51740 | 3% | +0.1 |
| 2684794 | FIRESTONE BLVD | 45646 | 46981 | 3% | +0.1 |
| 143661 | FIRESTONE BLVD | 45646 | 46981 | 3% | +0.1 |
| 104847 | FIRESTONE BLVD | 41171 | 41331 | 0% | < 0.1 |
| 104667 | FIRESTONE BLVD | 63614 | 65497 | 3% | +0.1 |
| 105182 | FIRESTONE BLVD | 53909 | 55651 | 3% | +0.1 |
| 2684728 | FIRESTONE BLVD | 41171 | 41331 | <1% | < 0.1 |
| 140724 | FIRESTONE BLVD | 52587 | 54448 | 4% | +0.2 |
| 140683 | FIRESTONE BLVD | 56012 | 58122 | 4% | +0.2 |
| 105661 | FIRESTONE BLVD | 60386 | 62189 | 3% | +0.1 |
| 105619 | FIRESTONE BLVD | 53557 | 55470 | 4% | +0.2 |
| 2684790 | FIRESTONE BLVD | 52587 | 54448 | 4% | +0.2 |
| 140675 | HOLMES AVE | 7416 | 7680 | 4% | +0.2 |
| 140677 | HOLMES AVE | 7934 | 8363 | 5% | +0.2 |
| 104837 | HOOPER AVE | 7860 | 8754 | 11% | +0.5 |
| 130498 | HOOPER AVE | 8026 | 9036 | 13% | +0.5 |
| 2684748 | HOOPER AVE | 9107 | 9350 | 3% | +0.1 |
| 104955 | HOOPER AVE | 20874 | 22109 | 6% | +0.2 |
| 2684816 | HOOPER AVE | 9107 | 9350 | 3% | +0.1 |
| 2684744 | HOOPER AVE | 16754 | 18348 | 10% | +0.4 |
| 104953 | HOOPER AVE | 9107 | 9350 | 3% | +0.1 |
| 2684820 | HOOPER AVE | 20874 | 22109 | 6% | +0.2 |
| 2684818 | HOOPER AVE | 20874 | 22109 | 6% | +0.2 |
| 2684730 | HOOPER AVE | 21315 | 22407 | 5% | +0.2 |
| 2684726 | HOOPER AVE | 7860 | 8754 | 11% | +0.5 |
| 104846 | HOOPER AVE | 21315 | 22407 | 5% | +0.2 |
| 104948 | HOOPER AVE | 16754 | 18348 | 10% | +0.4 |
| 130500 | HOOPER AVE | 5906 | 6828 | 16% | +0.6 |
| 104836 | HOOPER AVE | 2120 | 2208 | 4% | +0.2 |
| 140726 | MAIE AVE | 5754 | 6161 | 7% | +0.3 |
| 140686 | MAIE AVE | 3386 | 3973 | 17% | +0.7 |

| Link ID | Road Name | Future No-Project ADT Volume | Future With-Project ADT Volume | Total Percent-Change in Daily Volume | Resulting Increase in Traffic Noise Level (dBA) |
|---|---|---|---|---|---|
| 140684 | MAIE AVE | 4556 | 5011 | 10% | +0.4 |
| 140678 | NADEAU ST | 23023 | 23810 | 3% | +0.1 |
| 140682 | NADEAU ST | 24345 | 26358 | 8% | +0.3 |
| 105633 | NADEAU ST | 29320 | 31213 | 6% | +0.3 |
| 2684796 | NADEAU ST | 24345 | 26358 | 8% | +0.3 |
| 105670 | NADEAU ST | 19283 | 20094 | 4% | +0.2 |
| 105174 | NADEAU ST | 25431 | 27885 | 10% | +0.4 |
| 2684808 | NADEAU ST | 36802 | 38251 | 4% | +0.2 |
| 105911 | NADEAU ST | 36802 | 38251 | 4% | +0.2 |
| 104671 | NADEAU ST | 16238 | 18685 | 15% | +0.6 |
| 104949 | NADEAU ST | 25967 | 25087 | -3% | -0.1 |
| 106020 | S ALAMEDA ST | 38627 | 39484 | 2% | +0.1 |
| 106120 | S ALAMEDA ST | 43735 | 44059 | 1% | < 0.1 |
| 105976 | S ALAMEDA ST | 42341 | 42495 | <1% | < 0.1 |
| 105937 | S ALAMEDA ST | 43133 | 43508 | 1% | < 0.1 |
| 105910 | S ALAMEDA ST | 42359 | 43006 | 2% | +0.1 |
| 105844 | S ALAMEDA ST | 15515 | 15732 | 1% | +0.1 |
| 2684806 | S ALAMEDA ST | 43768 | 43701 | <1% | < 0.1 |
| 2684858 | S ALAMEDA ST | 49879 | 49491 | -1% | < 0.1 |
| 105758 | S ALAMEDA ST | 49879 | 49491 | -1% | < 0.1 |
| 105833 | S ALAMEDA ST | 43768 | 43701 | <1% | < 0.1 |
| 2684810 | S ALAMEDA ST | 44455 | 45079 | 1% | +0.1 |
| 105876 | S ALAMEDA ST | 44455 | 45079 | 1% | +0.1 |
| 106055 | S ALAMEDA ST | 0 | 0 | - | - |
| 2684742 | S CENTRAL AVE | 29057 | 29656 | 2% | +0.1 |
| 104675 | S CENTRAL AVE | 30805 | 31214 | 1% | +0.1 |
| 104670 | S CENTRAL AVE | 29057 | 29656 | 2% | +0.1 |
| 2684814 | S CENTRAL AVE | 31288 | 31801 | 2% | +0.1 |
| 104682 | S CENTRAL AVE | 31288 | 31801 | 2% | +0.1 |
| 2684746 | S CENTRAL AVE | 30805 | 31214 | 1% | +0.1 |
| 2684724 | S CENTRAL AVE | 20983 | 21003 | 0% | < 0.1 |
| 104666 | S CENTRAL AVE | 20983 | 21003 | 0% | < 0.1 |
| 104662 | S CENTRAL AVE | 22226 | 22497 | 1% | +0.1 |
| 104655 | S CENTRAL AVE | 24445 | 24516 | <1% | < 0.1 |
| 130501 | S CENTRAL AVE | 23266 | 22873 | -2% | -0.1 |
| 104834 | S CENTRAL AVE | 29773 | 30521 | 3% | +0.1 |
| 104824 | S CENTRAL AVE | 27622 | 27490 | 0% | < 0.1 |
| 130499 | S CENTRAL AVE | 27654 | 28312 | 2% | +0.1 |

| Link ID | Road Name | Future No-Project ADT Volume | Future With-Project ADT Volume | Total Percent-Change in Daily Volume | Resulting Increase in Traffic Noise Level (dBA) |
|---|---|---|---|---|---|
| 104818 | S CENTRAL AVE | 28324 | 28190 | <1% | < 0.1 |
| 143843 | SANTA FE AVE | 7954 | 7979 | <1% | < 0.1 |
| 106024 | SANTA FE AVE | 34294 | 34579 | 1% | < 0.1 |
| 106023 | SANTA FE AVE | 30405 | 30609 | 1% | < 0.1 |
| 106119 | TWEEDY BLVD | 29544 | 30034 | 2% | +0.1 |
| 105632 | WALNUT DR | 7598 | 7989 | 5% | +0.2 |
| 105678 | WILMINGTON AVE | 8089 | 8249 | 2% | +0.1 |
| 105681 | WILMINGTON AVE | 8993 | 9342 | 4% | +0.2 |

*Source: AECOM 2021, Fehr & Peers 2021*

# APPENDIX F

# CEQA VMT MODELING ASSUMPTION MEMO

AECOM

# County of Los Angeles, Department of Regional Planning
# Slauson Station TOC Specific Plan, aka
# Florence-Firestone Transit Oriented District Specific Plan and EIR (FFTOD Specific Plan)

**Future Conditions Projections: CEQA VMT Modeling Assumption Memo**
**September 2021**

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## Introduction

The following provides documentation of the assumptions and methodologies used to conduct the VMT modeling necessary for analyzing proposed Florence-Firestone TOD Specific Plan (Project) as well as the raw results of the analysis used to calculate the VMT impact metrics associated with the Project. This memorandum includes assumptions and methodologies used to generate and correlate TAZ-associated socio-economic data (SED) for the Project and those related to the SCAG RTP/SCS Regional Travel Demand Forecasting Model (the Model).

The SED is used as the input data for the vehicle miles traveled (VMT) model and establishes the buildout for the existing plus project condition under CEQA.

The following data sources were used to develop this approach and the SED data:

- Los Angeles County Assessor Parcels (existing units and square footage)
- Current jobs/square foot based on SCAG SED 2012 model for total employment / (Existing commercial SF from County Assessor/1,000)
- Land use and trip generation assumptions from City of Los Angeles VMT Calculator Documentation version 1.3, LADOT and DCP, May 2020
- Average Household Size from US Census, ACS 2017 5-year average
- Analysis of FFTOD SPA average household size compared to the Countywide average included in the Mobility & Equity Study

Assumptions for each SED category is discussed below.

Additional assumptions and methodology choices related to the Model include the following four points:

- Approach to Travel Analysis Zones that cross the Project boundary
- Inclusion of future transportation network projects
- Default TDM factor that is assumed in the Model
- Method of deriving results for a horizon year between the two validated Model years.

These choices as well as the raw results of the analysis are discussed below.

## SED Assumptions

### 1. Base Year Total Employment per Square Foot (Sq. Ft.):

Total employment for the base year establishes the existing condition of the plan area as a baseline for determining if the Project will add employment.

This data point is calculated based on detailed SCAG SED 2016 model for total employment / (Existing Commercial SqFt from County Assessor/1000).

### 2. Future Year Projected Employment:

Future year projected employment provides an assumption of how many jobs could be present in the FFTOD Specific Plan Area based on proposed Project buildout. This is used to understand the level of employment as a method for estimating employee trips. The following methodology generated future employment based on areas of change; this future employment was added to the Base Year Total Employment from the detailed SCAG SED 2016 model.

A. The County of Los Angeles, having adopted VMT guidelines in July of 2020, has not yet established population/ jobs per unit assumptions by land use1. The City of Los Angeles (LA) has established population/ jobs per unit assumptions for their VMT calculations to convert different land uses into population or employment estimates. Absent similar conversion rates developed specifically for Los Angeles County, the consultant team recommended using the City of LA employment by land use type assumptions for SED future projections analysis.

B. Assumptions used for this analysis based on the established City of LA guidelines include the five land use categories listed below.

   - Retail: 2 employees/ 1,000 square feet
   - Office: 4 employees/ 1,000 square feet
   - Restaurant: 4 employees/1,000 square feet
   - Automotive Uses: 1 employee/1,000 square feet
   - Light Industrial: 1 employee/1,000 square feet

C. The bulk of the proposed changes in General Plan Land Use and zones in the FFTOD Specific Plan Area are focused within mixed use land use designations and zones, as shown in **Figures 1 and 2**. A programmatic Specific Plan does not have the ability to predict the type of non-residential uses that can be included in a mixed use development. Generally, mixed use development includes commercial non-residential uses, such as retail, office, and restaurant on the ground floor with residential uses above. Therefore, a weighted average of the number of employees per 1,000 square feet for the five land use categories listed above was generated to establish a "blended" jobs factor to estimate existing and projected commercial or mixed use development.

D. To establish the blended employment factor, AECOM analyzed the existing ratio of retail, office, and restaurant uses in the FFTOD Specific Plan Area based on parcel square footage. Based on the FFTOD Specific Plan Phase 1 Market and Real Estate Study (September 2020), the types and mix of land uses are generally not expected to change based on the low volume of development projects in the FFTOD Specific Plan Area over the past 10 years. This condition creates a basis for applying a blended jobs average to mixed use developments that would mimic the existing ratio of uses. Table 1 documents the weighted average assessment used to generate a blended jobs factor.

E. The weighted average analysis of commercial non-residential uses yielded an assumed blended employment factor of 2.31, as retail uses are the predominant existing land use. The blended factor was applied to the acreage for each zone changing to mixed use and commercial zones within each TAZ. Given the level of automotive land uses in these areas, which has a lower employment factor of 1.0, the 2.31 factor is considered to account for the range of employment types by land use in the FFTOD Specific Plan Area.

F. Industrial zones that are not substantially changing permitted uses—Light Manufacturing (M-1) or Heavy Manufacturing (M-2) proposed zoning—are not considered change zones, and thus are not expected to redevelop into other uses that would produce significantly different average employee per square foot ratios than what currently exists, as shown in **Figure 2**. Industrial Mix (IX) zone will continue to allow light industrial uses and office employment. Based on the permitted Floor Area Ratio (FAR) of 1.0 consistent with the IL Light Industrial General Plan land use designation, and size of actual IF parcels in the Specific Plan area, the employment factor of the IF zones is not anticipated to change.

G. Existing uses in the Specific Plan area include a range of employment types. When these uses and their employment are summed and divided across the acreage of the associated land uses this yields an existing ratio of employment types across the community. A programmatic Specific Plan does not have the ability to predict whether the existing uses will turn over or if the market conditions will shift heavily in favor

[1] Source: City of Los Angeles VMT Calculator Documentation (May 2020). Available at: Documents | LADOT (lacity.org)

of one type of employment or another. Therefore, for the purposes of the VMT analysis all zones that include non-residential uses, excluding the IX and mixed use zones, are assumed to maintain the existing ratio of employment types currently present in the community.

**Table 1:** Weighted Average Analysis, Existing FFTOD Specific Plan Area Land Uses

| Generalized Land Use Type | Land Area[1] | | | Floor Area Ratio (FAR) | | | Jobs | |
|---|---|---|---|---|---|---|---|---|
| | Lot SF | Built SF | % of Total | Effective | Low | High | City of LA Employment Factor (per 1,000 SF)[2] | Assumed Blended Employment Factor for Mixed use zones[3] |
| **Commercial Non-Residential** | | | | | | | | |
| Retail | 4,275,053 | 1,466,391 | 86.5% | 0.34 | 0.04 | 2.6 | 2 | 2.31 |
| Restaurant | 228,965 | 69,463 | 4.1% | 0.30 | 0.08 | 0.73 | 5 | |
| Office | 332,158 | 159,346 | 9.4% | 0.48 | 0.01 | 1.2 | 4 | |
| *Total* | *4,836,176* | *1,695,200* | | *0.35* | | | | |
| **Automotive / Light Industrial Non-Residential** | | | | | | | | |
| Auto Repair | 776,207 | 169,860 | 67.8% | 0.22 | 0.02 | 0.81 | 1 | |
| Light Industrial | 258,851 | 80,789 | 32.2% | 0.31 | 0.09 | 0.92 | 1 | |
| *Total* | *1,035,058* | *250,649* | | *0.24* | | | | |

1 Source: County of Los Angeles Assessor parcel data
2 Source: City of Los Angeles VMT Calculator Documentation (May 2020). Available at: Documents | LADOT (lacity.org)
3 Blended factor formula: =SUMPRODUCT(% of Total)/SUM(City of LA Employment Factor (per 1,000 SF)[2]

### 3. Average Household Size Assumptions:

Average household size correlates expected household population with the number of housing units anticipated under the proposed Project buildout. This data point enables generation of a population estimate for the Project horizon year (2035). This is used to understand the future population and infrastructure demand. Calculation methodology is as follows:

A. The existing persons per household in the FFTOD Specific Plan Area is 4.6 based on the SCAG SED 2012 model. This average was applied to the lower density proposed zones (RLM-1 and RLM-2) that are intended to maintain the existing densities or increase slightly with the understanding that a similar housing type would maintain a similar household population. This would support an extension of the existing household size in the majority of the FFTOD Specific Plan Area.

B. Higher density proposed zones for residential and mixed use areas were not assigned the existing community person per household average. Higher-density areas, especially associated with high transit access, are generally associated with lower person-per household calculations. These potential higher-density zones were assumed to have a lower average household size of 3.2, consistent with the current Countywide average[2].

### 4. Developed Units (HH):

This data point estimates expected number of housing units anticipated under the proposed Project buildout. This data point enables generation of a population estimate for the Project horizon year (2035). This is used to understand the future population and infrastructure demand. Calculation methodology is as follows:

C. To estimate the projected number of housing units (households) it is necessary to assume a potential achievable density given proposed zoning parameters. Many factors influence proposed development, some of which—including site constraints, development feasibility, development standards, and market trends—may lead to development projects that do not reach allowable densities. Therefore, it is reasonable to assume that not all properties that redevelop will be developed at maximum allowed densities and intensities. The FFTOD Specific Plan Phase 1 Market and Real Estate Study (September 2020) indicated that potential sites that could allow mixed use development would likely incorporate affordable housing because market-rate mixed use development is not currently economically feasible in this primary market.

[2] Source: US Census, ACS 2017 5-year average

**Figure 1:** Proposed Land Use Designation Change Areas

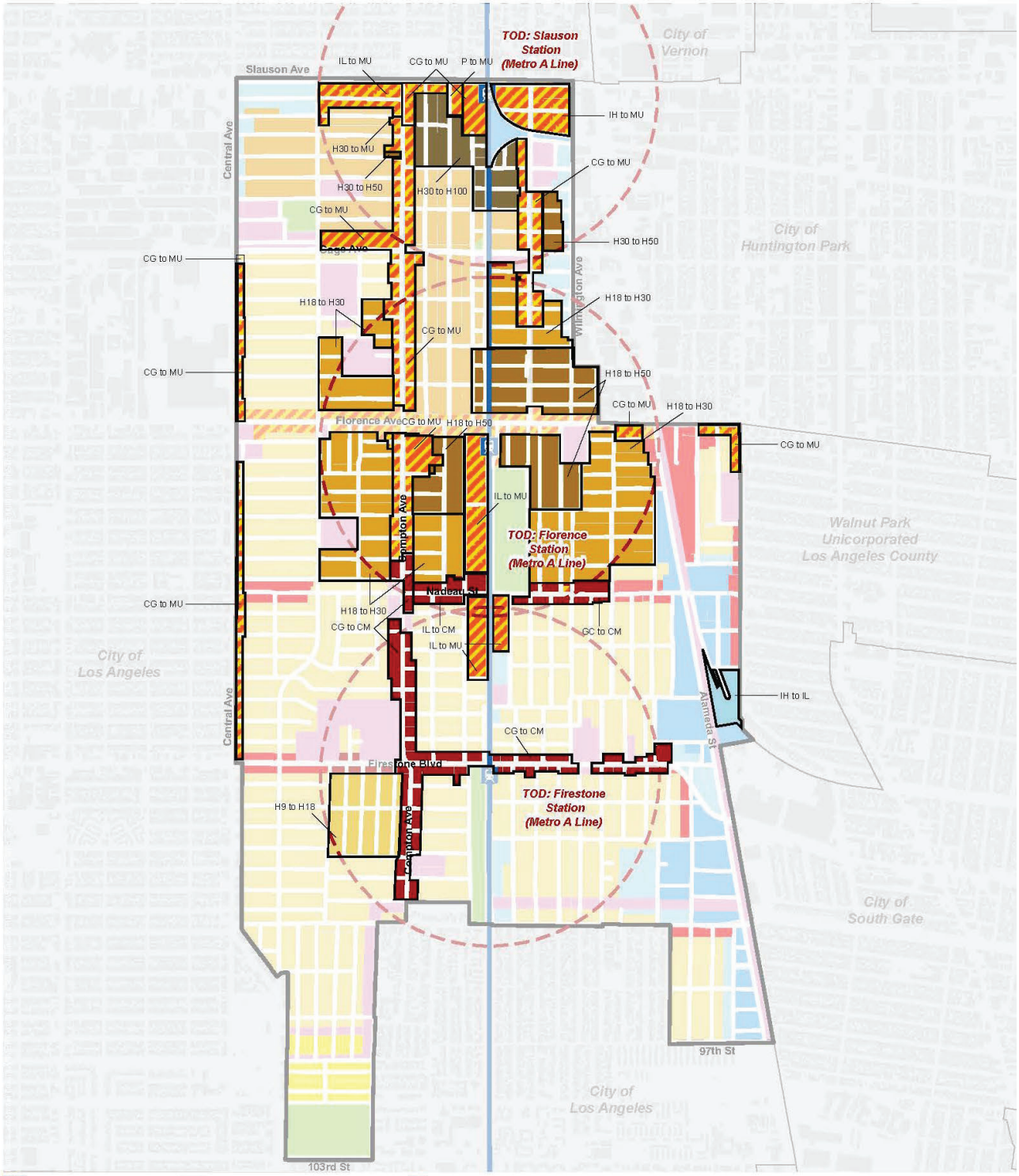
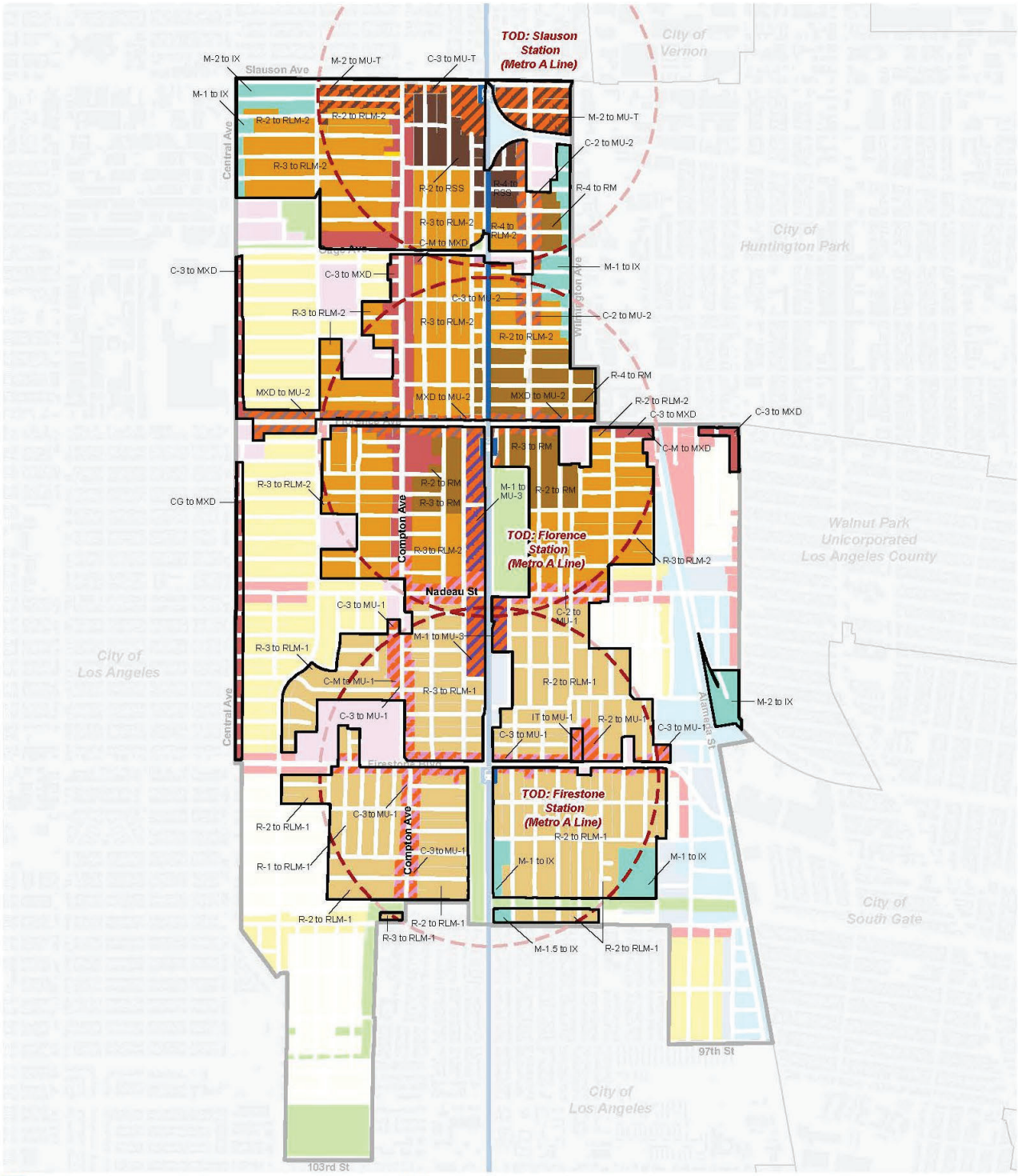


**Figure 2:** Proposed Zone Change Areas



D. Additionally, developer interviews conducted as part of the study indicated interest from the development community in building high-density housing within the TOD portions of the FFTOD Specific Plan Area, but that it would also unlikely be market-rate. Given that historical rent data revealed that achievable rents in the FFTOD Specific Plan Area that are unlikely to support market-rate new construction, this analysis assumes that a majority of the development to occur between now and 2035 will be Affordable Housing or included affordable units as part of the state's Density Bonus Allowance program.

   Market research identified a variety of multifamily residential projects that have either been recently completed or are currently under construction, and that are near light rail stations or in neighborhoods with market characteristics similar to the FFTOD Specific Plan Area, such as Willowbrook, Compton, Long Beach, Boyle Heights, as well as the Florence-Firestone neighborhood. These development projects were used to develop four broad Density Prototype Categories that fit within the various allowable densities found in the FFTOD Specific Plan's proposed zones. These density categories are averages that can represent a wide variety of residential product types that the market is likely to deliver. The 20-30 du/ac category represents for-sale ownership multifamily product types such as townhomes or single-family lots that redevelop with multiple units on-site. The remainder of the density categories and identified projects are all Affordable Housing developments, some of which contain commercial components and some of which are composed of only residential uses. See **Figure 3**.

   **Figure 3:** Density Prototype Categories




E. Generally, developers produce projects that balance market demand and the ability to reach financial feasibility thresholds, usually responding to market factors at a point in time (e.g. achievable rents, construction costs, competitive supply, available financing, etc.). Since this analysis estimates development through the year 2035, it is reasonable to assume that where allowed, each proposed zone will host a variety of "project prototypes" of varying densities that develop over time.

F. For each of the proposed zone that allow residential units, an "Assumed Average Density" of dwelling units per acre (du/ac) was calculated. The Assumed Average Density is derived from an assumed mix of the four Density Prototypes Categories mentioned above. The Assumed Average Density is calculated for each proposed zone in **Table 2**.

   1. The estimated mix of densities for each of the proposed zones is based on what is allowed according to the zones respective density parameters, historical and contemporary development patterns in this or similar markets, and other considerations like location, adjacencies, and neighborhood character. Estimates focus on the density prototype 2 to allow for fluctuations in the market and an understanding that not all properties will redevelop, and those properties that do redevelop will not all achieve the maximum density allowed.

      a. MU-1. This zone is identified as a lower-intensity mixed use zone when compared to the other proposed mixed-use zones. This is meant to help preserve the existing character of the neighborhood. For this reason the 3 lower densities were identified as likely development

prototypes at 30 du/ac, 70 du/ac, and 110 du/ac. Future development is estimated to be comprised of 50% at the middle density of 70 du/ac with the remaining future development split between the other two density prototypes.

b. MU-2, MU-3, MU-T, MXD. These mixed-use zones have been identified as holding the most potential for dense residential mixed-use development. MU-3 and MU-T zones are proposed to transform parcels formerly zoned as industrial to residential mixed-use development within walking distance to the transit stations. MU-2 zones are found along major corridors and are also in close proximity to transit stations. MXD zones have been identified as RHNA sites, with a majority of these sites along major corridors or within close proximity to transit stations. These zones are more likely to see more of the denser development prototypes allowed at 70 du/ac, 110 du/ac, and 140 du/ac. Future development is estimated to be comprised of 50% at a middle density of 107.5 du/ac with the remaining future development split between the other two density prototypes.

**Table 2:** Assumed Average Density by Zone

| Proposed Zone Designation | Density Prototype 1 | | Density Prototype 2 | | Density Prototype 3 | | Assumed Average Density DUAC |
|---|---|---|---|---|---|---|---|
| | *DUAC* | *% of new development* | *DUAC* | *% of new development* | *DUAC* | *% of new development* | |
| **MU-1** | 110 | 25% | 70 | 50% | 30 | 25% | **70** |
| **MU-2** | 140 | 25% | 110 | 50% | 70 | 25% | **107.5** |
| **MU-3** | 140 | 25% | 110 | 50% | 70 | 25% | **107.5** |
| **MU-T** | 140 | 25% | 110 | 50% | 70 | 25% | **107.5** |
| **MXD** | 140 | 25% | 110 | 50% | 70 | 25% | **107.5** |
| **RLM-1** | NA | NA | NA | NA | NA | NA | **NA** |
| **RLM-2** | 20 | 100% | 0 | 0% | 0 | 0 | **20** |
| **RM** | 25 | 100% | 0 | 0% | 0 | 0 | **25** |
| **RSS** | 110 | 50% | 70 | 50% | 0 | 0 | **90** |

RLM-1. This zone is designed to provide stability for homeowners and existing residents by limiting options for lot consolidation and multi-family densities. The standards are also design to enable existing single-family properties to add ADUs or duplex units more effectively than under currently regulatory conditions. Based on these density and standard limitation, anticipated growth in the RLM-1 zone are not calculated using the average density method.

1. New units (ADUs) are not expected to result in the demolition of existing residential units.
2. Investing in such new units (ADUs or conversion to duplexes) requires a significant amount of capital up front, which may present a barrier to lower income households that comprise the majority of the RLM-1 zone area.
3. Based on historical data, it is conservatively assumed that 2% of parcels in RLM-1 zone will add ADUs or duplexes (see Section 5).
4. New units added to RLM-1 are derived by multiplying the number of existing units in each TAZ by 2%, representing the historical trend in Southern California that a small percentage of properties will add these units.

c. RLM-2. This zone is found in neighborhoods that are currently mostly single-family residences. Development standards proposed in this zone are intended to allow properties to reach develop at densities that are not currently achievable under existing development standards. The minimum allowed density in this zone is 20 du/ac, the maximum allowed density in this zone is 30 du/ac.

Given the huge investment required to redevelop an existing developed lot, the market indicators suggest that to offset for this hurdle to redevelopment (which results in lower number of parcels being redeveloped) a reasonable assumption would be that 100% of the future development would occur at the 20 du/ac.

d. RM. This zone is similar to RLM-2 but allows for development up to 50 du/ac. Market indicators suggest that most development will occur in the 20-30 du/ac density category. 100% of the new development in this zone is expected to be at the midpoint of this category, 25 du/ac.

e. RSS. This zone allows for residential development from 50-100 du/ac. Future development is estimated to be split evenly between the two density categories that are close to these parameters, 70 du/ac and 110 du/ac.

**5. Potential Buildout Factor:**

The ability of the FFTOD Specific Plan Area to accommodate population and jobs is based on assumptions about what level of development can reasonably be expected (based on zoning, existing improvements, and market activity) to occur during the life of the plan (2035). Due to the FFTOD Specific Plan Area being nearly fully built out, investment in an area like this carries higher costs (buy out of existing parcels with built homes), risks (generally small lot sizes, existing circulation or orientation constraints), and include parcels or development that will not redevelop based on their value, history, or existing improvement level. These conditions ensure that a 100% parcel redevelopment to the maximum allowed level will not occur. Therefore, it is necessary to determine an estimation of anticipated future development known as the "reasonable expected development." For purposes of the following methodology "reasonable expected development" may also be referred to as "capacity," though it is not intended to represent maximum build out.

A. To calculate the "reasonable expected development" it is necessary to assign a potential buildout factor to estimate project buildout capacity. Economic conditions and market trends, policies and regulations, financial lending practices and funding sources, site constraints, and construction and acquisition costs also influence market decisions related to development. While it is difficult to predict future conditions, it is reasonable to assume that not all properties in the FFTOD Specific Plan Area will redevelop. The build-out factors are used to reflect reasonable capacity.

   The potential buildout factor is expressed as a percentage and is based on the acreages of land designated for each proposed zone, existing land uses, and available market data. For example, a 25% build out factor indicates the percentage of land acreage within a certain zone designation estimated to redevelop.

B. Historical market data revealed little development activity in a primary market area, which is defined as encompassing the 0.25-mile radius from each of the three Metro A (Blue) Line stations, Slauson Station, Florence Station, and Firestone Station. Real estate development projects currently under construction as well as those built since 2010 account for approximately 1% of the total land acreage in the primary market area (adjusted for infrastructure, parks, and public schools). Single-family residential projects were not included in this data set of real estate projects.

C. Within the FFTOD Specific Plan the following were assumed based on the assessment of the market, characteristics of the station areas and proposed zones, as well as published literature and research on infill development patterns and expectations:

   1. Areas expected to experience the highest level of investment and buildout are the proposed highest-density residential (RSS) and mixed use (MU-2, MU-3, and MU-T) zones that are currently industrial but have been rezoned to allow for substantial mixed use development, including high-density multifamily residential uses. Literature[i] on the effect of light rail transit on land use change found that industrial uses were more likely to change land uses within 0.5 miles of light rail stations than other major land uses. One study found approximately 46% of industrial acres within a half mile of a station changed land uses after the light rail was operational. These areas include MU-T zones near the Slauson Station and MU-3 near the Florence Station. MU-1, MU-2 and MXD zones also have some existing industrial and auto-service uses, but to a lesser extent.

   2. Areas with the next highest expected change are existing commercial uses. As with the case of industrial uses, commercial uses in the FFTOD Specific Plan Area generally have low FAR utilization

and are present in areas along major transit corridors. Proposed zones with significant commercial uses are MU-1, MU-2, and MXD. One study on land use change near transit stations demonstrated a turnover rate of approximately 9% for commercial parcels within a half mile of transit stations.

3. Existing residential areas are expected to experience the lowest rates of change. These areas are assumed to increase density marginally, not reaching the maximum density based on level of existing buildout, lot sizes, and policies related to anti-displacement. The RSS zone enables up-zoning of higher residential density near the Slauson Station. RLM-1 and RLM-2 zones are allowed much lower maximum densities, and individual lot improvements or additions of ADUs are expected to be the primary driver of additional units in these zones. One study examining land use change around light rail stations found that 7% of multifamily uses within a half mile of transit stations redeveloped in the three years leading up to the transit line being operational, while that number dropped to 3% after transit became operational. A 2016 McKinsey Report[ii] on closing California's housing gap projected that 1% of single-family residences could add a detached ADU, while 5% could add an in-home unit attached to the house. These rates are lower for a number of reasons, including:
    a. Investing in such additions requires a significant amount of capital up front, which may present a barrier to lower income households
    b. Although growing in popularity, some homeowners are unfamiliar with ADUs
    c. Local regulations and policy standards can make ADU installation difficult
    d. Financing ADUs can be difficult when not planned as part of initial mortgage
4. All areas identified for new FFTOD Specific Plan zones with a residential component are subject to market conditions and have experienced little investment in the previous ten years, as shown in Table 3.

**Table 3:** Development since 2010 within ½ mile of FFTOD Metro Station Areas

| Property Address | Year Built | Land Use | Land Area (AC) | Residential Units | Dwelling Units per Acre (du/ac) |
|---|---|---|---|---|---|
| 1708 E 61st St | 2022 | Multifamily | 0.41 | 56 | 136 |
| 1619 Firestone Blvd | 2022 | Multifamily | 0.15 | 20 | 130 |
| 1600-1610 E Florence Ave | 2021 | Multifamily | 0.94 | 110 | 117 |
| 7321 Miramonte Ave | 2021 | Multifamily | 0.66 | 44 | 67 |
| 1670 E 82nd Pl | 2020 | Multifamily | 0.10 | 2 | 20 |
| 1661 E 62nd St | 2019 | Multifamily | 0.16 | 4 | 25 |
| 6218 Compton Ave | 2019 | Multifamily | 0.46 | 30 | 65 |
| 1717 E 61st St | 2013 | Multifamily | 0.61 | 30 | 49 |
| 6901 S Alameda St | 2019 | Industrial | 2.06 | | |
| 7512 Maie Ave | 2017 | Industrial | 0.45 | | |
| 7522 Maie Ave | 2017 | Industrial | 0.86 | | |
| 1717 E Slauson Ave | 2012 | Industrial | 0.29 | | |
| 8301-8313 Compton Ave | 2019 | Retail | 0.37 | | |
| 1302 E Slauson Ave | 2019 | Retail | 0.99 | | |
| 1824-1830 E Slauson Ave | 2019 | Retail | 1.08 | | |
| 1789 Firestone Blvd | 2018 | Retail | 0.09 | | |
| 1933-1935 E Florence Ave | 2014 | Retail | 0.33 | | |
| 1931 E Florence Ave | 2014 | Rretail | 0.56 | | |
| 1900 E Slauson Ave | 2010 | Retail | 1.54 | | |

Source: CoStar

D. Market conditions may change with the introduction of increased FAR and density allowances of the proposed zones; however, constraints such as lot size and existing improvements are still present. Table 5 outlines the estimated potential build out factors and market indicator rational for each proposed zone that enables a change in land use(s).

   Achieving development at buildout factors beyond the estimated potential build out factor levels may occur with a dramatic shift in market dynamics such that rent prices and land values in the area would increase significantly more than expected. Although market indicators point to this scenario being unlikely, one of the primary purposes of a Specific Plan is to provide infrastructure planning and CEQA streamlining for future projects. Therefore, in consultation with LA County Department of Regional Planning, the strategic decision was made to increase the potential buildout factor of each zone by 5% or 10% to adequately provide a margin of coverage for future projects. Table 4 outlines the market indicated "reasonable expected development" percentage and the strategically adjusted projected buildout factor ultimately used in the SED.

   Increase beyond these levels is discouraged. Increases would likely result in substantial over estimation of development that would result in inappropriately increasing required infrastructure investments and development fees. Increased development fees in a soft to marginal market like this would actively discourage investment in the area and veer away from the Los Angeles County and LA Metro goals for the FFTOD Specific Plan Area.

**Table 4:** Reasonable Expected Development and Projected Building Out Factor by Zone

| **Proposed/ Existing Zone** | **Reasonable Expected Development** (Market Indicated) | **Projected Buildout Factor** (Strategically Adjusted by County) |
|---|---|---|
| **MU-T** | 30% | 40% |
| **MU-3** | 25% | 35% |
| **MU-2** | 15% | 25% |
| **MXD** (RHNA sites)* | 15% | 80%* |
| **MXD** (non-RHNA sites) | 15% | 20% |
| **MU-1** | 15% | 20% |
| **RSS** | 10% | 15% |
| **RLM-1** | 2%** | 6%** |
| **RLM-2** | 1% | 6% |
| **RM** | 1% | 6% |
| **IX** | 0% (redevelopment may occur, however no change in FAR results in no new buildout) | |

*Consistent with the Housing Element Update (2021), buildout factor is set at 80% to reflect that 100% of RHNA sites are assumed to redevelop to achieve 80% of the allowed site capacity. This is inclusive of the requirement that a minimum of 2/3 of the allowed FAR being dedicated to residential units.

** RLM-1 zone is not assigned a buildout factor to determine redeveloped acres, but rather new units in this zone are calculated by assuming 3% of properties will add an ADU and 3% of properties will add a Duplex.

**Table 5:** Market Indicated Reasonable Expected Development by Proposed Zone

| |
|---|
| **MU-3: Reasonable Expected Development factor of 25%.** |
| The proposed MU-3 zone changes parcels currently zoned for industrial uses to allow for mixed uses. The previously mentioned study on land use changes around light rail stations[iii] identified that 46% of industrial acres switched land uses. The 25% estimate represents a dialed down redevelopment rate due to strong demand for industrial uses around Los Angeles. The southern California region is a global trading center and logistical hub, which have kept industrial uses in the greater Los Angeles submarket in high demand to support both international trade and serve the large regional population. While new zoning may create new value in these sites, they may be less likely or slower to turnover, especially as the available supply of industrial land uses close to population centers continues to decrease with growing demand for logistics and warehousing space stemming from a boom in e-commerce. However, MU-3 contains relatively large parcels that have low FAR utilization and may show promise as development opportunities to investors. |
| **MU-T: Reasonable Expected Development factor of 30%.** |
| This buildout factor is similar to that of the MU-3 zone, for the same reasons. However, this buildout factor also considers the Slauson Station stop on the future West Santa Ana Branch, which would connect the area to different part of Los Angeles to the north as well as southeastern portions of Los Angeles County, which may cause further impetus for redevelopment and thus the slightly higher buildout factor. The MU-T zone is located only around the Slauson Station. |
| **MU-1 and MU-2: Reasonable Expected Development factor of 15%.** |
| Since these designations are a blend of industrial and commercial uses, the factor takes cues from the 46% and 9% observed turnover rates in identified literature[iv], respectively. Commercial areas are more compatible with residential uses and may not have to endure site remediation that is often associated with contaminated industrial areas. |
| **MXD : Reasonable Expected Development factor Varies**. |
| **MXD (non-RHNA sites): Reasonable Expected Development factor of 15%.**<br>In alignment with the MU-1 and MU-2 zones, the MXD designation is a blend of industrial and commercial uses, the factor takes cues from the 46% and 9% observed turnover rates in identified literature[v], respectively. Commercial areas are more compatible with residential uses and may not have to endure site remediation that is often associated with contaminated industrial areas. |
| **MXD (RHNA sites): Reasonable Expected Development factor of 80%.**<br>MXD RHNA sites were identified through the Housing Element Update process consistent with State law. RHNA sites are identified based on State criteria that qualifies them as 'opportunity sites' for rezoning and the ability to enable multi-family development at the density levels assumed. The Specific Plan is rezoning the MXD RHNA sites to implement the Housing Element Update, and providing planning for appropriate infrastructure services and CEQA streamlining. Based on these considerations, the buildout factor for the MXD RHNA sites has been set at 80% to be consistent with the 2021 Housing Element Update; associated buildout potential of the VMT model and CEQA documentation does not constrain the ability of the RHNA sites to build out at or above the indicated levels. |
| **RLM-1, RLM-2, RM: Reasonable Expected Development factor of 1%.** |
| Currently the area is considered fully built out with a range of single-family and low density multifamily units. Existing single-family residence lots are least likely to redevelop based on historical data and fiscal investment requirements by existing property owners or investors. Typically homeowners in lower-income in areas like the FFTOD Specific Plan Area may face barriers to capital-intensive improvements to their property. Typical redevelopment occurring as a result of upzoning in communities like the proposed RLM-1, RLM-2 and RM neighborhoods result in development that historically yields approximately 25 du/ac (e.g., townhome style residences). Achieving higher densities up to 50 du/ac. would require significant parcel consolidation which is a high barrier to redevelopment given the high financial investment of purchasing existing built units and the logistical and time considerations of doing so in neighborhoods with a fragmented ownership pattern. All these factors indicate the low buildout factor identified.<br>Consistent with the Developed Units discussion above, new unit and population assumptions for the RLM-1 zone are expressed in the data differently than other proposed zones. This is based on the record of development that indicates the majority of new units added in a zone of this density would be accessory dwelling units (ADUs). For this reason, the |

| |
|---|
| RLM-1 zone is not assigned a buildout factor to determine redeveloped acres, but rather new units in this zone are calculated by assuming 1% of properties will add an ADU and 1% of properties will add a Duplex. Additionally, based on the understood overcrowding of these area, new ADUs would be anticipated to alleviate some overcrowding, and providing housing for some new residents. Thus the additional population factor is expressed as 0.5 persons per additional unit. |
| **RSS: Reasonable Expected Development factor of 10%.** |
| This estimate is based on several considerations. The three FFTOD stations have operated for more than 30 years—the RSS zone is located near Slauson Station, which opened in 1990. While some parcels in this area may have redeveloped since then, the new zoning may unlock enough potential value to incentivize new investment to redevelop parcels at greater densities; such investment would likely be driven by parcel consolidation. Parcel consolidation or redevelopment of existing multifamily properties may be challenging in the area and may occur at a slow rate over time. This buildout factor also considers the Slauson Station stop on the future West Santa Ana Branch, which would connect the area to different part of Los Angeles to the north as well as southeastern portions of Los Angeles County, and may serve as additional impetus for redevelopment. This 10% buildout factor is a midpoint between two observations found in literature on land use change around light rail stations, which indicated multifamily properties showed a 16% turnover rate near stations in the years leading up to a stations opening, but a substantially lower turnover (3%) after the station became operational. |
| **IF: Reasonable Expected Development factor of 0%** |
| The IF zone implements the existing land use designation for these parcels and thus does not increase FAR beyond what is currently permitted. This condition creates a zone that would expand the range of allowed non-industrial commercial uses; however, given the static maximum FAR land use changes would be expected to result in adaptive reuse of existing buildings, or replacement of buildings at approximately the same square footage of existing building. This is based on the type of allow light industrial and commercial uses that would be permitted in the area that tend to include a need for logistics space, truck access, and parking areas. Thus, expected change of uses in the proposed IF zone during through the Specific Plan horizon year would result in a zero change factor. |

### 6. Reasonable Commercial Square Footage (Sq Ft):

Reasonable commercial square footage establishes the potential future condition of non-residential building area under the proposed Project buildout (2035). This is used to understand the level of employment that can be generated and destinations within the community that would provide goods or services that generate consumer, employee, and delivery trips. Calculation methodology is as follows.

A. To estimate the projected developed commercial square footage, this analysis uses a commercial square feet per resident ratio. The commercial square feet per resident ratio is based on the existing amount of commercial (retail, restaurant, and office) space in the FFTOD Specific Plan Area as well as the existing population. Dividing the commercial square footage of approximately 1.7 million square feet by an existing population of 61,750 yields a ratio of 27.5 commercial square feet per resident.

B. The number of housing units projected to be built in the FFTOD Specific Plan Area by 2035 can be estimated by applying the buildout factor to land associated with each zone and understanding the average densities likely to develop. Projected population can then be calculated using a population per household figure to multiply against the reasonable expected development of housing units.

C. This net new population can be used to form the basis for new commercial square footage demanded, by relating the new population back to the 27.5 commercial square feet per resident.

D. The FFTOD Specific Plan Phase 1 Market and Real Estate Study (September 2020) identified key market factors that indicate non-residential development is not expected to significantly increase in the Florence-Firestone community. See the study for definition of Primary and Secondary markets.

   1. Existing employment concentrations are in retail trade, manufacturing, and wholesale trade sectors; all these sectors are characterized by low FAR configurations.

   2. The Slauson and Florence Station areas have a higher concentration of non-residential uses and jobs, with the Firestone Station area being more residential and neighborhood services oriented.

3. The majority of new development projects in the Primary and Secondary markets has been multi-family residential, with a minority of retail or industrial development projects. The three-station TOD areas experienced one retail and nine residential projects between 2010 and 2020 based on permit data; this resulted in 4,736 new square feet of non-residential and 93 housing units.
4. Interviews with the development community reinforced the data. Developers indicated:
    a. The retail opportunity is modest and limited to neighborhood-level tenants.
    b. Commercial corridors in the FFTOD Specific Plan Area offer sites that could allow mixed use development, which would likely have to be affordable housing because market-rate mixed use development is not currently economically feasible.
    c. There is interest from the development community in building high density housing within the TOD portions of the FFTOD Specific Plan Area, but it is unlikely to be market-rate.
5. This analysis assumes that a majority of the housing produced in the FFTOD Specific Plan will be affordable income-restricted housing.
    a. The relatively low rents achievable in this housing submarket, coupled with high construction costs, make market-rate housing development especially difficult under current conditions. Various funding sources available to projects within transit-oriented zones and those with significant affordable housing components may push projects towards economic feasibility.
    b. Affordable housing developments are likely to receive significant financial support in the form of grants, subsidies, and funds from local, state, and federal governments. Over time market conditions may improve to a point where market-rate housing development may be supported in the FFTOD Specific Plan Area, however protections against gentrification and displacement may also keep the area affordable to low-income and working-class communities.
    c. As most of the future housing development is projected to be affordable housing, dispensable incomes in the area are not projected to rise at a considerable rate. Rather, new populations are likely to maintain the current ratio of retail and services square footage that is currently observed in the market.

E. Additionally, overestimating the buildout potential of uses increases the risk to future development in the community by overestimating the need for new infrastructure and thus increasing the development fees beyond what is necessary to support actual development. In this way, over estimating build out can be a strong deterrent to investment in an area.

F. Based on the documented factors, SED data was managed to assume a maintained level of commercial square footage for new residents. This analysis also assumes that commercial square footage demolished to make room for new development would be replaced by new commercial square footage in the new development.

## VMT Model Assumptions

### 1. Approach to Travel Analysis Zones that cross the Project boundary:

Transportation Analysis Zones (TAZs) are the geographic unit of analysis used by the Model. In cases where the TAZ boundaries do not align with the proposed Project boundaries, a decision must be made to determine how to allocate the land use and associated SED that falls within the TAZ but outside the proposed Project boundary.

For the analysis of the FFTOD Specific Plan Area, three TAZs out of 32 included area that fell outside the proposed Project boundary. For these three TAZs, a visual inspection was conducted using aerial photography to confirm whether the trip-generating land use and SED falls outside or within the proposed Project boundary. A review of the County Property Assessment data was conducted to determine the proportion and type of employment that should be reallocated to adjacent TAZs outside the proposed Project boundary. None of these three TAZs had housing data associated in the Model.

The following approach was taken for employment data in each of the three TAZs:

- TAZ 21561100 – 60% of non-education employment was moved to the next adjacent TAZ outside the proposed Project boundary (TAZ 21575300)
- TAZ 21562300 – all employment was moved to the next adjacent TAZ outside the proposed Project boundary (TAZ 21577100)
- TAZ 21576200 – 90 industrial-related jobs were allocated to the next adjacent TAZ outside the proposed Project boundary (TAZ 21568100)

**2. Transportation network projects complete by horizon year:**

The Model includes a number of future transportation network projects that are assumed to be complete by the Model's horizon year. Because the proposed Project's horizon year is 2035 and the Model's horizon year is 2040, the transportation network projects that are expected to be complete by 2040 but not complete by 2035 should be removed to better reflect the anticipated conditions for 2035. Although the proposed Project is located in central LA County, transportation network projects were reviewed for the entire LA County area because they would be likely to influence regional travel including travel to and from the proposed Project. To determine the anticipated opening year of each transportation network project, Metro plans, Board Reports, and project updates were reviewed.

The following transportation network projects were reviewed, with the following determinations:

- *Slauson Light Rail, Crenshaw Corridor to Metro Blue Line Station:* Not anticipated to be complete by 2035; removed from Model.
- *Metro Green Line Extension, Metro Green Line Norwalk Station to Norwalk Metrolink Station:* Not anticipated to be complete by 2035; removed from Model.
- *Vermont Short Corridor, Wilshire/Vermont to Exposition/Vermont:* Included in Metro's 28 by '28 project list; retained in Model.
- *West Santa Ana Branch Transit Corridor:* Phase 1 from Pioneer Station to Metro A (Blue) Line Slauson Station included in Metro's 28 by '28 project list; retained in Model. Phase 2 from Slauson Station to Downtown LA not anticipated to be complete by 2035; removed from Model.
- *Sepulveda Transit Corridor:* Valley-Westside portion of the project is identified for potential acceleration under Metro's 28 by '28 list; retained in the Model. Phase 3 from Westside to LAX not anticipated to be complete by 2035; removed from Model.
- *East San Fernando Valley Light Rail Transit Project:* Anticipated to be complete by 2035; retained in Model.
- *Metro Gold Line Eastside Extension Phase 2 Transit Corridor:* Included in Metro's 28 by '28 list; retained in Model.

**3. RTP/SCS Model TDM factor:**

The Model's 2040 horizon year (Scenario 40s3) includes a TDM factor of 17.2% applied as a reduction to vehicle trips. This factor is intended to reflect the policies and projects included in the RTP/SCS that would be critical to meeting SCAG's regional GHG reduction goals, but such a large reduction may be difficult to achieve. A more conservative TDM factor of 5.7% is provided in an alternative scenario provided by SCAG (Scenario 35s1). For the modeling conducted for the proposed Project, the more conservative 5.7% TDM factor was used.

**4. Method used to derive results for a horizon year between the two validated Model years:**

In order to derive the "No Project" land use assumptions for the 2035 horizon year, upon which the Project SED (based on the methodologies for the proposed Project described above) was added, a straight-line interpolation was used between the validated Model years of 2012 and 2040.

## Model Results

The raw results of the analysis using the Model and the above assumptions and methodologies, along with the calculations to derive the VMT impact metrics for the proposed Project, are included in Table 6, below.

**Table 6:** Model Results and VMT Metric Calculations

| | Total Population[1] | Total Employment[1] | Total Service Population | Total Daily VMT[2] | Total Daily VMT per Service Population[3] |
|---|---|---|---|---|---|
| | **(A)** | **(B)** | **(C)=(A)+(B)** | **(D)** | **(E)=(D)/(C)** |
| 2035 FFTOD Specific Plan Area | 100,423 | 11,408 | 111,831 | 2,270,604 | 20.3 |

Notes:

[1] SED input reflecting the proposed Project, based on the described methodology and assumptions in this memorandum.

[2] Raw model results.

[3] Calculation to derive the required VMT metric.

Source: SCAG RTP/SCS Travel Demand Forecast Model.

[i] Hurst, Needham B. & West, Sarah E., 2014. "**Public transit and urban redevelopment: The effect of light rail transit on land use in Minneapolis, Minnesota**," Regional Science and Urban Economics, Elsevier, vol. 46(C), pages 57-72.

[ii]Source:https://www.mckinsey.com/~/media/McKinsey/Industries/Public%20and%20Social%20Sector/Our%20Insights/Closing%20Californias%20housing%20gap/Closing-Californias-housing-gap-Full-report.pdf

[iii] Hurst, Needham B. & West, Sarah E., 2014. "**Public transit and urban redevelopment: The effect of light rail transit on land use in Minneapolis, Minnesota**," Regional Science and Urban Economics, Elsevier, vol. 46(C), pages 57-72.

[iv] Hurst, Needham B. & West, Sarah E., 2014. "**Public transit and urban redevelopment: The effect of light rail transit on land use in Minneapolis, Minnesota**," Regional Science and Urban Economics, Elsevier, vol. 46(C), pages 57-72.

[v] Hurst, Needham B. & West, Sarah E., 2014. "**Public transit and urban redevelopment: The effect of light rail transit on land use in Minneapolis, Minnesota**," Regional Science and Urban Economics, Elsevier, vol. 46(C), pages 57-72.

Fehr & Peers
Updated 8/11/2021

**FFTOD Specific Plan Project**
**Vehicle Miles Traveled (VMT) Summary**

| VMT Metrics | | 2020 South County Baseline | 2020 FFTOD Specific Plan Area Baseline (Existing)[1] | 2035 No Project | 2035 with FFTOD Specific Plan Project | Compared to 2020 South County Baseline | | Compared to 2035 No Project | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | Change | Percent Change | Change | Percent Change |
| **Socioeconomic Data** | Service Population | 13,702,927 | 72,464 | 74,390 | 111,831 | N/A | N/A | 37,441 | 50% |
| **Vehicle Trips** | Total Vehicle Trips | 38,967,719 | 174,757 | 187,473 | 252,951 | N/A | N/A | 65,478 | 35% |
| | Total Vehicle Trips per Service Population | 2.8 | 2.4 | 2.5 | 2.3 | -0.6 | -20% | -0.2 | -10% |
| **VMT** | Total VMT | 413,456,018 | 1,612,123 | 1,741,840 | 2,270,604 | N/A | N/A | 528,764 | 30% |
| | **Total VMT per Service Population** | **30.2** | **22.2** | **23.4** | **20.3** | **-9.9** | **-33%** | **-3.1** | **-13%** |
| **Average Trip Length** | Average Trip Length: Total Trips | 10.6 | 9.2 | 9.3 | 9.0 | -1.6 | -15% | -0.3 | -3% |

Source: LA County Transportation Impact Analysis Guidelines (July 23, 2020), LA County Baseline VMT Data Memorandum (January 14, 2021), and SCAG 2016 RTP/SCS Travel Demand Forecast Model.

Note:
1. The 2020 FFTOD Specific Plan Area Baseline reflects an interpolation result between the 2012 Baseline and 2035 No Project scenarios for the Specific Plan Area.

# CEQA FINDINGS OF FACT REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE FLORENCE-FIRESTONE TOD SPECIFIC PLAN

## STATE CLEARINGHOUSE NO. 2021030300

# 1.0 BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA.

# 2.0 PROJECT SUMMARY

## 2.1 PROJECT LOCATION

The proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

## 2.2 PROJECT DESCRIPTION

The FFTOD Specific Plan would establish transit oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as

part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5 mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

## 2.3 PROJECT OBJECTIVES

The project objectives are to:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

The FFTOD Specific Plan objectives were identified by the TOD Program and the Florence-Firestone Community Plan in collaboration with Caltrans.

## 2.4 ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the Los Angeles County (the lead agency for the proposed project) CEQA Guidelines, Los Angeles County conducted an extensive environmental review of the proposed project.

- Los Angeles County issued a Notice of Preparation (NOP) and Initial Study for the proposed project on March 15, 2021. The public review period extended from March 15, 2021 to April 14, 2021.
- Los Angeles County held an online scoping meeting for the proposed project on March 25, 2021 via Zoom.
- Based upon the Initial Study and Environmental Checklist Form, Los Angeles County staff determined that a Draft EIR (Draft EIR) should be prepared for the proposed project. The scope of the Draft EIR was determined based on Los Angeles County's Initial Study, comments received in response to the NOP, and comments received at the scoping meeting conducted by Los Angeles County.
- Los Angeles County prepared a Draft EIR, which was made available for a 45-day public review period beginning September 21, 2021 and ending November 5, 2021.
- Los Angeles County prepared a Final EIR (Final EIR), including the Responses to Comments to the Draft EIR, the Findings of Fact, and the Statement of Overriding Considerations. The Final EIR/Response to Comments contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents.
- Los Angeles County held public hearings on the proposed project, including a Regional Planning Commission hearing on January 19, 2022, and a County Board of Supervisors Hearing on March 15, 2022.

## 2.5 RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by Los Angeles County in conjunction with the proposed project
- The Final EIR
- The Draft EIR
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR
- The Mitigation Monitoring and Reporting Program
- The reports and technical memoranda included or referenced in the Response to Comments
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR
- The Resolutions adopted by Los Angeles County in connection with the proposed project, and all documents incorporated by reference therein
- Matters of common knowledge to Los Angeles County, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

## 2.6 CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for Los Angeles County's actions related to the proposed project are at the Los Angeles County Department of Regional Planning (DRP), 320 West Temple Street, Room 1356, Los Angeles, CA 90012. The DRP is the custodian of the administrative record for the proposed project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the DRP. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

# 3.0 FINDINGS OF FACTS AND OVERRIDING CONSIDERATIONS

Los Angeles County, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the Draft EIR and Final EIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
    1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
    2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
    3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.
(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
(e) Compensating for the impact by replacing or providing substitute resources or environments.

# 4.0 FINDINGS AND FACTS REGARDING IMPACTS

## 4.1 IMPACTS DETERMINED NOT TO BE SIGNIFICANT

### 4.1.1 INITIAL STUDY AND SECTION 5.0, OTHER CEQA CONSIDERATIONS, OF THE DRAFT EIR

The proposed project was found to have either no impact or a less-than-significant impact on the following environmental issue areas, as determined in Section 5.0 Other CEQA Considerations of the Draft EIR and the Initial Study (Appendix A of the Draft EIR). Below is a brief discussion stating the reasons why various possible significant effects of a project were determined not significant and therefore not discussed in detail in Section 3.0 of the Draft EIR.

- **Aesthetics:**
    - *The FFTOD Specific Plan would not have a substantial adverse effect on a scenic vista.* There are no designated scenic highways, significant ridgelines, or other identified scenic resources in the FFTOD Specific Plan Area. As a result, impacts to scenic vistas related to implementation of the FFTOD Specific Plan would be less than significant.
    - *The FFTOD Specific Plan would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail.* According to the Trails Map by the Los Angeles County Department of Parks and Recreation, no Los Angeles County trails are in the FFTOD Specific Plan Area. Therefore, the project would not be visible or obstruct views from a regional trail, and no impact would occur.
    - *The FFTOD Specific Plan would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.* Based on a review of the California Department of Transportation Scenic Highways Program, no state scenic highways are in the FFTOD Specific Plan Area. The closest scenic highway to the FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. Therefore, the FFTOD Specific Plan Area is not visible from this highway, and the project would not result in impacts to scenic resources within view of a state scenic highway. The project would not damage scenic resources and no impact would occur.

- **Agriculture and Forestry:**
    - *The FFTOD Specific Plan would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.* According to the California Important Farmland Finder maintained by the California Department of Conservation, the majority of the FFTOD Specific Plan Area is designated as Urban and Built-Up Land. There is an area of Unique Farmland at the southern boundary of the FFTOD Specific Plan Area west of Compton Avenue and south of 91st Street. The FFTOD Specific Plan would include zone changes for existing residential parcels adjacent to this area of Unique Farmland. However, the FFTOD Specific Plan would not convert the Unique Farmland to a nonagricultural use. Therefore, the impact would be less than significant.
    - *The FFTOD Specific Plan would not conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.* There are no existing Williamson Act contracts in this part of Los Angeles County, and there are no designated agricultural resource areas in the FFTOD Specific Plan Area. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.
    - *The FFTOD Specific Plan would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 [g]), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104[g]).* The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not in an area zoned for forest land, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. Therefore, implementation of the project would not conflict with or cause rezoning of forest land or timberland, and no impact would occur.
    - *The FFTOD Specific Plan would not result in the loss of forest land or conversion of forest land to nonforest use.* The FFTOD Specific Plan Area is not zoned for forest land, nor does it contain any forests. Therefore, implementation of the project would not result in the loss of forest land or conversion of forest land to nonforest use, and no impact would occur.
    - *The FFTOD Specific Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use.* Although the FFTOD Specific Plan includes zone changes for existing residential parcels adjacent to an area of Unique Farmland, it does not propose converting the Unique Farmland to nonagricultural use. In addition, the changes associated with the FFTOD Specific Plan would not be expected to result in future conversion of this farmland to nonagricultural use, because the farmland would remain in the same context of agricultural activities

in an electrical transmission right-of-way that is surrounded by urban development. Therefore, the impact would be less than significant.

- **Biological Resources:**
  - *The FFTOD Specific Plan would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).* The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and lacks natural, vegetated areas (such as creeks or channels) that could support sensitive natural communities or native habitat for sensitive species. The proposed FFTOD Specific Plan provides for infill development in an already highly disturbed urban environment. Any occurrence of a sensitive species in the FFTOD Specific Plan Area is expected to be an incidental occurrence, such as during foraging. It is anticipated that some trees would likely be removed to accommodate construction of development projects, which has the potential to impact nesting birds if future development occurs during the nesting season. By law, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to protect migratory and nesting birds. As such, impacts to nesting birds would be less than significant.
  - *The FFTOD Specific Plan would not have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, nonjurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.* According to the National Wetlands Inventory managed by the USFWS, no riparian habitat or nonjurisdictional wetlands are in the FFTOD Specific Plan Area. In addition, the FFTOD Specific Plan Area lacks natural, vegetated areas that could support sensitive natural communities or native habitat for sensitive species. No impact would occur.
  - *The FFTOD Specific Plan would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.* There are no state or federally protected wetlands in the FFTOD Specific Plan Area, which is heavily urbanized. The closest mapped wetland to the FFTOD Specific Plan Area is Compton Creek, approximately 1.3 miles south of the FFTOD Specific Plan Area. Therefore, the project would have no impact on wetlands.
  - *The FFTOD Specific Plan would not 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.* The FFTOD Specific Plan Area is heavily urbanized and does not present suitable habitat to support the movement of native or migratory fish. Existing trees and vegetation in

the FFTOD Specific Plan Area may be used as habitat by migratory birds. However, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with state and federal regulations that protect migratory wildlife, including the MBTA and California Fish and Game Code. Therefore, impacts would be less than significant.

- *The FFTOD Specific Plan would not convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).* According to the DRP's Distribution of Oak Species in Los Angeles County Map, there is no occurrence of oak woodlands or other unique native woodlands in or near the FFTOD Specific Plan Area, as the area is developed with urban land uses. Therefore, no impact would occur to oak woodlands or native woodlands.
- *The FFTOD Specific Plan would not conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (Los Angeles County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (Los Angeles County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (Los Angeles County Code, Title 22, Ch. 102), Specific Plans (Los Angeles County Code, Title 22, Ch. 22.46), Community Standards Districts (Los Angeles County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (Los Angeles County General Plan, Figure 9.3).* The only applicable local policy or ordinance protecting biological resources for the FFTOD Specific Plan Area is the Los Angeles County Oak Tree Ordinance (County Code of Ordinances Sections 22.56.2050 et seq.), which prohibits anyone from damaging or removing oak trees without a permit from DRP. Although no occurrence of oak woodlands or other unique native woodlands occur in or near the FFTOD Specific Plan Area, existing landscaping in the FFTOD Specific Plan Area may include oak trees. However, future proposed development under the FFTOD Specific Plan would be required to adhere to the Oak Tree Ordinance, which requires permit applicants to submit a site plan and an oak tree report. As a result, the project would not conflict with any local plans or policies protecting biological resources, and impacts would be less than significant.
- *The FFTOD Specific Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan.* According to the Habitat Conservation Database managed by the USFWS, the FFTOD Specific Plan Area is not in any adopted Habitat Conservation Plan area. In addition, based on the California Natural Community Conservation Plans Map created by CDFW, the FFTOD Specific Plan Area is not in any Natural Community Conservation Plan area. No impact would occur.

- **Geology and Soils:**
    - *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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 active fault trace.* The California Earthquake Hazards Zone Application Map issued by the California Geological Survey shows no active faults or Alquist Priolo Earthquake Fault Zones in the FFTOD Specific Plan Area. The closest known fault is the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area. Due to the distance between the FFTOD Specific Plan Area and the nearest active fault, future development pursuant to implementation of the FFTOD Specific Plan is unlikely to experience ground rupture. The impact would be less than significant.
    - *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.* Future development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the provisions of the California Building Code, which are imposed on development projects by Los Angeles County during the building plan check and development review process. Compliance with the requirements of the California Building Code would ensure that impacts related to the hazards associated with strong seismic ground shaking would be less than significant.
    - *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.* The FFTOD Specific Plan Area has a flat topography. In addition, according to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is not in or near a landslide zone. Therefore, no impact would occur.
    - *The FFTOD Specific Plan would not have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater.* The FFTOD Specific Plan Area is served by a public sanitary sewer system. Future developments pursuant to implementation of the FFTOD Specific Plan would include connections to sanitary sewers and would not use on site wastewater treatment systems. No impact would occur.
    - *The FFTOD Specific Plan would not Conflict with the Hillside Management Area Ordinance (Los Angeles County Code, Title 22, Ch.22.104).* The FFTOD Specific Plan Area has a flat topography and is not subject to the Hillside Management Area Ordinance.
- **Hazards and Hazardous Materials:**
    - *The FFTOD Specific Plan would not be in 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. The project would not result in a safety hazard or excessive noise for people residing or*

*working in the project area.* According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or within 2 miles of a public or public use airport. The nearest public use airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the area and no impact would occur.

- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in a high fire hazard area with inadequate access.* According to the Fire Hazard Severity Zones Map prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the FFTOD Specific Plan Area is not in or near a Very High Fire Hazard Severity Zone. Therefore, there would be no impact to people or structures in a high fire hazard area with inadequate access.
- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in an area with inadequate water and pressure to meet fire flow standards.* The FFTOD Specific Plan Area is not in a Very High Fire Hazard Severity Zone. Furthermore, the Florence-Firestone community is served by Fire Station 16 at 8010 Compton Avenue. The Los Angeles County Fire Department requires adequate water and pressure to service an area, and adequate water and pressure to meet fire flow standards would be continued with buildout of the FFTOD Specific Plan. Therefore, the impact would be less than significant.
- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the Project is not in proximity to land uses that have the potential for dangerous fire hazard.* The FFTOD Specific Plan Area is presently heavily urbanized with industrial and commercial land uses that inherently have some fire hazard potential. However, these existing uses primarily consist of retail store, shopping center, and auto service commercial uses with nearby residential uses that are typical of an urban setting and would not be considered a dangerous fire hazard. Additionally, the proposed FFTOD Specific Plan zones would consider uses suitable for employment near residential areas as well as the creation of transitions between industrial uses that would serve to limit exposure of people to certain land uses. Therefore, a less than significant impact would occur to people or structures in proximity to land uses that have the potential for fire hazard.
- *The FFTOD would not propose a use that would constitute a potentially dangerous fire hazard.* The FFTOD Specific Plan would address land use and zoning changes and provide recommendations for mobility improvements that support housing density and employment in proximity to the LA Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. It would include light industrial and commercial

land uses that may use or manufacture products/materials that could present some fire hazard. However, the FFTOD Specific Plan Area is already heavily urbanized with industrial and commercial land uses that also inherently have some fire hazard potential. The majority of the existing industrial uses in the FFTOD Specific Plan Area are light manufacturing, with a small amount of heavy manufacturing, with industrial uses primarily clustered along industrial corridors with auto related uses. The proposed Industrial Flex zone would maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for employment near residential areas. The Mixed-Use Zoning Categories (MU-1, MU-2, MU-3, and MU-T) would create an employment-focused, high-intensity mixed-use transit district that allows for the creation of transitions between industrial uses. The Industrial Flex zone would allow for the creation of transitions between employment uses and residential to encourage less noxious uses and focus on light industrial, neighborhood-serving commercial and office uses. Therefore, future development in these zones would not constitute a potentially dangerous fire hazard or increase the potential for dangerous fire hazards as they would consist of typical urban land uses, similar to existing conditions. The impact would be less than significant.

- **Hydrology and Water Quality:**
  - *The FFTOD Specific Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows which would expose existing housing or other insurable structures in a federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding.* The Federal Emergency Management Agency (FEMA) Flood Map Service Center, managed by the Department of Homeland Security, indicates that the FFTOD Specific Plan Area is in an area of minimal flood hazard. In addition, DRP's GIS-NET Public Map shows no streams or rivers in the FFTOD Specific Plan Area. Therefore, future development pursuant to implementation of the FFTOD Specific Plan would not impede or redirect flood flows and would not expose existing housing to flood hazards. The impact would be less than significant.
  - *The FFTOD Specific Plan would not otherwise place structures in federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.* The FFTOD Specific Plan Area is designated as an area of minimal flood hazard. Future development pursuant to implementation of the FFTOD Specific Plan would not place structures in the federal 100-year flood hazard or Los Angeles County Capital floodplain areas. The impact would be less than significant.

- *The FFTOD Specific Plan would not conflict with the Los Angeles County Low Impact Development Ordinance (Los Angeles County Code, Title 12, Ch. 12.84).* All designated, nondesignated, street and road construction, and single-family hillside home projects in the Unincorporated Areas of Los Angeles County, including in the Florence-Firestone community, are required to comply with the Low Impact Development (LID) Standards Manual. A comprehensive LID plan and analysis demonstrating compliance with the LID Standards Manual must be submitted for review and approval by the Director of Public Works. Future redevelopment and infill development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the ordinance as applicable. No impact would occur.
- *The FFTOD Specific Plan would not use on-site wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).* The FFTOD Specific Plan Area is served by existing public sanitary sewers. No wastewater treatment systems are proposed in the FFTOD Specific Plan Area. Additionally, the FFTOD Specific Plan Area does not contain geological limitations or surface water such as rivers and lakes. Therefore, no impact related to use of wastewater treatment systems in these areas would occur.
- *The FFTOD Specific Plan would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.* The FFTOD Specific Plan Area is designated as an area of minimal flood hazard. The Los Angeles County Tsunami Inundation Maps created by the California Department of Conservation show that the FFTOD Specific Plan Area is not in a tsunami inundation zone. In addition, the Dam Locations Map created by the Los Angeles County Public Works show no dams or reservoirs in or near the area, indicating that the FFTOD Specific Plan Area is not in a seiche zone. Because the FFTOD Specific Plan Area is not in any of the aforementioned zones, no impact related to the risk of release of pollutants due to inundation would occur.

- **Land Use and Planning:**
  - *The FFTOD Specific Plan would not physically divide an established community.* Implementation of the FFTOD Specific Plan would include land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the LA Metro A Line Station area (i.e., Slauson, Florence, and Firestone Stations). These improvements would make it easier for bicyclists and pedestrians to access these stations and enhance commercial development focused on serving the local community. Redevelopment and infill development of parcels in the FFTOD Specific Plan Area would result in additional housing units and promote multi-modal connectivity and increase access to transit within the community. Therefore, implementation of the project would not physically divide an established community. A less than significant impact would occur.

- *The FFTOD Specific Plan would not conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas.* DRP defines Hillside Management Areas (HMAs) as areas with 25 percent or greater natural slopes, and Significant Ecological Areas (SEAs) as areas with irreplaceable biological resources. According to DRP's GIS-NET Public database, no HMAs or SEAs are in or near the FFTOD Specific Plan Area. Therefore, the project would not conflict with the goals and policies of the General Plan related to HMAs or SEAs and no impact would occur.

- **Mineral Resources:**
  - *The FFTOD Specific Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.* According to the Generalized Mineral Land Classification Map of Los Angeles County – South Half issued by the California Geological Survey, the majority of the FFTOD Specific Plan Area is designated as Mineral Resource Zone (MRZ) 1, which indicates that no significant mineral deposits are present, or that there is little likelihood for their presence. The northern portion of the FFTOD Specific Plan Area, from Slauson Avenue until approximately E 62nd Street, is designated MRZ-2, which indicates that the area contains significant mineral deposits or high likelihood exists for their presence. However, that portion of the FFTOD Specific Plan Area is currently heavily urbanized with residential and industrial uses. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that are incompatible with mining. In addition, no active mines are in or near the FFTOD Specific Plan Area. Therefore, a less than significant impact would occur related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
  - *The FFTOD Specific Plan would not 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 General Plan does not specify areas of significant availability of a locally important mineral resource recovery site in the FFTOD Specific Plan Area. The FFCP also does not specify such mineral resource recovery areas. Although a portion of the FFTOD Specific Plan Area is designated as MRZ-2 the land is already built out with urban land uses incompatible with mining. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that would also be incompatible with mining. Therefore, the project would not result in the substantial 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 impact would be less than significant.

- **Noise:**
  - *The FFTOD Specific Plan would not be in the vicinity of a private airstrip or 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. The project would not expose people residing or working in the project area to excessive noise levels.* According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or a private airstrip, or within 2 miles of a public airport or public use airport. The closest airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. The project would not expose people residing or working in the FFTOD Specific Plan Area to excessive noise levels from aircraft. No impact would occur.

- **Recreation**:
  - *The FFTOD Specific Plan would not interfere with regional trail connectivity.* According to the Los Angeles County Department of Parks and Recreation's Trails Map, there are no Los Angeles County trails in the FFTOD Specific Plan Area. The project would not interfere with regional open space connectivity, and no impacts would occur.
- **Wildfire:**
  - *The FFTOD Specific Plan would not be located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project would not substantially impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors; 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; 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; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.* According to the California Fire Hazard Severity Zone Map prepared by CAL FIRE, the FFTOD Specific Plan Area is not within or near a Very High Fire Hazard Severity Zone within a Local Responsibility Area or a State Responsibility Area. Therefore, no impacts related to high fire hazard severity zones would occur.

## 4.1.2 SECTION 3.0 OF THE DRAFT EIR

This section identifies impacts of the project determined in the Draft EIR to be less than significant without implementation of programmatic mitigation measures.

### 1. Aesthetics

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no

changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact AES-1:** *The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality.*

Implementation of the FFTOD Specific Plan would establish transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian friendly and community serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three LA Metro A (Blue) Line Stations in the community (Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit oriented development pattern.

The FFTOD Specific Plan includes Guiding Principles and Concepts for each station and that serve as the approach to land use, urban design building standards, and mobility improvements. Zone regulations intended to guide development and decision making to achieve the vision and guiding principles of the FFTOD Specific Plan provide a detailed list of allowed land uses, permit requirements, and objective development standards for each zone in the FFTOD Specific Plan Area. Urban design standards of the FFTOD Specific Plan would provide a comprehensive approach to high quality design for the physical design of the FFTOD Specific Plan Area and would serve to upgrade and improve the aesthetic appearance of existing buildings, open space areas, and other site improvements through architectural and landscape improvements to enhance the overall visual character of the FFTOD Specific Plan Area.

The FFTOD Specific Plan also includes recommended strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The FFTOD Specific Plan would implement the Los Angeles County Transit Oriented District Toolkit (2019) and proposes to enhance the “frontage zone” portion of sidewalks in specific locations. In addition, major improvements have been identified to improve access to the LA Metro A Line Stations in the FFTOD Specific Plan Area with a focus on pedestrian accessibility.

Overall, development in accordance with the FFTOD Specific Plan would not degrade the existing visual character of the highly urbanized Florence-Firestone community. Redevelopment of existing and/or new buildings would be designed based on the FFTOD Specific Plan's urban design guidelines and include architectural and landscaping details that complement and enhance the overall quality of the community. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP. Impacts would be less than significant.

- **Impact AES-2:** *The project would not create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area.*

The FFTOD Specific Plan Area is a highly urbanized environment, and there are a number of existing sources of nighttime illumination. Buildout of the FFTOD Specific Plan would alter and intensify land uses and their related lighting sources throughout the FFTOD Specific Plan Area by introducing new building (interior and exterior), security, sign, street, parking lights. In addition to new mobility and transit amenities (lighted shelters, wayfinding signage) and lighting to increase the accessibility, safety, and convenience of multimodal travel, the project would introduce sources of aesthetic lighting and glare in the form of glazing and building materials.

The FFTOD Specific Plan includes development standards related to lighting and building materials that would reduce light and glare impacts generated by the project. In general, all outdoor lighting systems, including architectural lighting, shall not aim directly at the open sky, off site, or onto adjacent uses. Blinking, flashing, and oscillating lights are prohibited, and warm white lights shall be used where possible. Colored lights shall be avoided and only be used if they are part of a comprehensive architectural lighting theme of commercial areas or establishments. All parking structures must screen night lighting to avoid uplighting, spillover, and glare on nearby properties. Future development projects shall be required to comply with the specific development standards for lighting of their respective zones. Generally, all lighting and lighting fixtures shall be designed to complement buildings, be of an appropriate scale, avoid creating glare, and provide adequate light over walkways and parking areas to foster pedestrian safety.

Overall, development in accordance with the FFTOD Specific Plan would introduce new sources of light and glare. However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with the FFTOD Specific Plan would be typical of the surrounding area and what is expected for an urban, transit-oriented

community. Adherence to the FFTOD Specific Plan standards, Los Angeles County Code, and California Building Energy Efficiency Standards would reduce project-generated lighting and glare impacts to less-than-significant levels.

## 2. Air Quality

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact AQ-4:** *The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

Future development under the FFTOD Specific Plan is assumed to include mixed-use, residential, retail, commercial service, and industrial uses. New industrial uses would be required to be in compliance with South Coast Air Quality Management District (SCAQMD) Rule 402, Nuisance. Likewise, existing facilities are required to be in compliance with SCAQMD Rule 402 to prevent nuisances on sensitive land uses. In addition, the FFTOD Specific Plan includes land use regulations and development standards for TOD zones, which for mixed use communities for example, denote that operations shall not create objectionable and/or obnoxious dust, light, matter, mud, noise, odor, refuse, smoke, steam, vibration, maintenance needs of grounds or buildings, or other nuisance(s). Therefore, impacts related to other emissions, such as those leading to odors, would be less than significant.

## 3. Cultural Resources

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact CUL-4:** *The project would not disturb any human remains, including those interred outside of formal cemeteries.*

The FFTOD Specific Plan Area is developed and has previously been subjected to substantial ground disturbance, which likely already resulted in the discovery of subsurface materials such as human remains. Nevertheless, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. California Health and Safety Code Sections 7050.5, 7051, and 7054 requires that if human remains are discovered, disturbance of the site halt and remain halted until the coroner has investigated and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to their authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the Native American Heritage Commission by phone within 24 hours pursuant to Section 5097 of the California PRC. Therefore, compliance with these regulations would ensure impacts to discovery of human remains are less than significant.

## 4. Energy

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact ENE-1:** *The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.*

Energy-requiring activities range from equipment operation during construction, to building operations, to transportation during all phases of the FFTOD Specific Plan implementation; Fuel, electricity, and natural gas consumption associated with these activities was estimated and presented within Tables 3.4-1 through 3.4-5 of the Draft EIR. Fuel consumed during construction would be temporary in nature and would not represent a significant demand on available fuel, beyond normal construction fuel usage. There are no known project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable

construction sites in Los Angeles County. Operational transportation would be the greatest energy consuming factor associated with implementation of the FFTOD Specific Plan. The FFTOD Specific Plan provides for employment-generating land uses as well as a range of housing options and implements land use and transportation planning strategies that would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands. Building operations would account for approximately 26 percent of the energy consumption for the FFTOD Specific Plan Area. Compliance with existing regulations, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities would be more energy efficient than existing, average, similar-use buildings, as energy efficiency requirements have become more stringent over time. Considering this information, the FFTOD Specific Plan would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy and this impact is considered less than significant.

- **Impact ENE-2:** *The project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.*

Implementation of the FFTOD Specific Plan would result in the development of new land uses that would induce new demand for electricity and natural gas, as well as induce additional vehicle miles traveled that would result in the consumption of fossil fuels. However, design and construction of buildings would comply with the most recently adopted California Building Energy Efficiency Standards Code and California Green Building Standards Code (CALGreen), and the Los Angeles County CAP and OurCounty Sustainability Plan. This would ensure that future development would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance roofs and walls, and high efficacy lighting. Therefore, implementation of the FFTOD Specific Plan would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. This impact is less than significant.

## 5. Geology and Soils

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact GEO-1:** *The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: seismic-related ground failure, including liquefaction.*

Because Southern California is a seismically active area that can produce a high acceleration of seismic shaking, there is potential for exposure of people or structures to liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area. However, conforming to the CBC and Los Angeles County Building Code would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. Therefore, future implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading.

- **Impact GEO-2:** *The project would not result in substantial soil erosion or the loss of topsoil.*

Although the FFTOD Specific Plan Area is in a developed urban area, future construction activities may include excavation, grading, and other soil-disturbing activities that could result in soil erosion or loss of topsoil during rain or high-wind events. However, for projects disturbing more than 1 acre of ground surface, the Construction General Permit requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would include erosion control and sediment control best management practices (BMPs) such as sandbags and covering soil stockpiles, which would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Compliance with the Construction General Permit and BMPs identified in the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit requirements would ensure less-than-significant impacts related to erosion and topsoil during construction of specific developments in the FFTOD Specific Plan Area. Additionally, as part of compliance with the LID Standards, any specific future development project under the FFTOD Specific Plan qualifying as a new development or a redevelopment project would be designed to reduce off-site runoff, promote rainwater harvesting, and reduce erosion and hydrologic impacts downstream. The presence of vegetation on landscaped areas would also reduce the ability of soil to be eroded and lost by wind erosion. Impacts related to erosion and topsoil loss during operation of proposed development would be less than significant.

- **Impact GEO-3:** *The project would not be situated on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*

Development in accordance with the FFTOD Specific Plan requires conformance with the California Building Code (CBC) and Los Angeles County Building Code that would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. Therefore, the implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to liquefaction and liquefaction-induced lateral spreading.

Adherence to CBC and Los Angeles County Building Code requirements would include the preparation of a geotechnical investigation by a state licensed geotechnical engineer. The most effective, feasible, and economical site preparation measures recommended in the report would be incorporated into the site design in accordance with the building requirements. Therefore, the potential for unstable soils to adversely affect proposed structures and improvements resulting in settlement, subsidence, or collapse would be less than significant.

- **Impact GEO-4:** *The project would not create substantial or indirect risks to life or property related to expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994).*

Highly expansive soils swell when they absorb water and shrink as they dry and can damage building foundations and roads. Most of the soils on the project site are loamy fine sand, and thus could be expansive. However, future development projects (new development or redevelopment) pursuant to the FFTOD Specific Plan would be required to comply with applicable ordinances set forth by CBC and Los Angeles County and the most recent building and seismic codes in effect at the time of project design. Compliance with the CBC and Los Angeles County Building Code would ensure that FFTOD Specific Plan implementation would not substantially increase hazards from expansive soils.

## 6. Greenhouse Gases

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact GHG-2:** *The project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.*

The FFTOD Specific Plan would not conflict with applicable plans adopted for the purpose of reducing greenhouse gas (GHG) emissions, which include California Air Resource Board (CARB)'s Scoping Plan, Southern California Association of Governments (SCAG)'s 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) also known as Connect SoCal, and the Los Angeles County Community Climate Action Plan (CCAP).

The FFTOD Specific Plan and its objectives would directly support the goals of Assembly Bill (AB) 32 and Senate Bill (SB) 32 targeted by the CARB Scoping Plan. For example, the State's 2017 Scoping Plan update includes vehicle miles traveled (VMT) reduction goals that call for promotion of land use and community design that reduce VMT, transit-oriented development, and complete street design policies that prioritize transit, biking, and walking. As discussed in Section 3.14 Transportation of the Draft EIR, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. In addition, the FFTOD Specific Plan would comply with the most current Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) requirements. The CALGreen requirements include mandatory measures for all new building construction, which would result in energy conservation, and make a major contribution in meeting the State's goals established by AB 32 and SB 32 for reduction in GHG emissions. Further, future buildings constructed over the lifetime of the project would be subject to the future triannual updates to the Building and Energy Efficiency Standards, which will ultimately require zero net energy construction.

The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce vehicles miles traveled by cars, and streamline the environmental

review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. The FFTOD Specific Plan includes strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The recommended mobility infrastructure improvements identified support transit, pedestrian, and bicycle mobility, and improve parking conditions. Additionally, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. As such, the FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population, which is consistent with regional goals to reduce passenger VMT.

A consistency analysis with the FFTOD Specific Plan to the applicable measures in the Los Angeles County CCAP is provided in Table 3.6-7 Consistency with the Unincorporated Los Angeles County CCAP of the Draft EIR. As identified in the table, the FFTOD Specific Plan would be consistent with the measures in the CCAP.

Therefore, the FFTOD Specific Plan would not obstruct implementation of the CARB Scoping Plan, would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS, and would not conflict with the CCAP. Impacts are considered less than significant.

## 7. Hazards and Hazardous Materials

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact HAZ-1:** *The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*

Demolition and construction activities would require transport, use, and disposal of hazardous materials. Operation of the FFTOD Specific Plan would include new or different land use designations that may involve the routine use of substances classified as hazardous materials including fuels, pesticides, paints, and other materials. Upon compliance with federal, state, and Los Angeles County regulatory requirements (e.g.,

U.S. Department of Transportation [DOT], California Division of Occupational Safety and Health [Cal/OSHA], and Los Angeles County Fire Department [LACoFD]), construction and operation activities of future development projects related to implementation of the FFTOD Specific Plan would not pose substantial hazards to the public or the environment, and impacts would be less than significant.

- **Impact HAZ-3:** *The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.*

FFTOD Specific Plan buildout would result in usage and storage of hazardous materials on site and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions. Project operation could emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur; impacts would be less than significant.

- **Impact HAZ-5:** *The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*

It is possible that during the construction phase of future transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access. Compliance with any requirements, such as a traffic management plan, deemed necessary for approval of the Los Angeles County Public Works Traffic and Lighting Division, would ensure impacts to emergency access would be less than significant.

## 8. Hydrology and Water Quality

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact HWQ-1:** *The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.*

Because each future development project pursuant to implementation of the FFTOD Specific Plan would be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements, BMPs would be in place to prevent potentially harmful materials from being accidentally spilled or improperly disposed of during construction activities. Future development projects disturbing more than 1 acre of ground surface would be required to develop a SWPPP as part of compliance with the Construction General Permit that implements BMPs designed to prevent water quality degradation. Projects disturbing less than 1 acre of ground surface during construction would not be required to prepare a SWPPP but would be required to implement the minimum BMPs required by the Los Angeles County MS4 permit, thereby protecting water quality. As a result, construction impacts related to water quality standards or waste discharge requirements from implementation of the FFTOD Specific Plan would be less than significant.

Future development in the FFTOD Specific Plan Area would include residential, mixed use, commercial, and industrial uses; pollutants associated with these land uses typically include sediments, trash, petroleum products, metals, and chemicals. Compliance with regulations and implementation of LID practices per Los Angeles Regional Water Quality Control Board (LARWQCB) requirements and Los Angeles County Public Works Green Infrastructure Guidelines would minimize pollutants being transported off site into downstream receiving waters, and projects implemented in accordance with the FFTOD Specific Plan would not violate water quality standards or waste discharge requirements.

The FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. Impacts would be less than significant.

- **Impact HWQ-2:** *The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.*

Implementation of the FFTOD Specific Plan would include infill and redevelopment that would result in population growth; thereby increasing demand on water supplies.

Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies that will serve the proposed FFTOD Specific Plan to substantially impact the groundwater aquifer. Buildout of the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system because of the area's developed condition, and because future development projects would be required to incorporate LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines. Based on the depths to groundwater in the FFTOD Specific Plan, excavation for development would not come into contact with groundwater or require dewatering during excavation activities to an extent that groundwater levels would be adversely affected. Furthermore, because groundwater is not present close to the ground surface, stormwater infiltration BMPs (as described in the County LID Standards Manual) would be technically feasible on site, the use of which could increase the amount of groundwater recharge in the FFTOD Specific Plan Area compared to existing conditions. Therefore, implementation of the FFTOD Specific Plan would result in less-than-significant impacts on the Central Groundwater Basin from groundwater use and would result in less-than-significant impacts to the existing recharge capabilities of the area overlying the Central Groundwater Basin.

- **Impact HWQ-3:** *The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off site.*

With implementation of erosion and sediment control BMPs, construction activities associated with future development projects pursuant to implementation of the FFTOD Specific Plan would result in less-than-significant erosion and siltation impacts. Because future development projects would be required to implement the County LID Standards Manual and Green Infrastructure Guidelines, implementation of development within the FFTOD Specific Plan Area would result in a less-than-significant erosion and siltation impact during operations.

- **Impact HWQ-4:** *The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site.*

The majority of the FFTOD Specific Plan Area is built out with urban land uses. Each future development project pursuant to implementation of the FFTOD Specific Plan would be required to have site-specific hydrology and hydraulic studies to determine capacity of the existing storm drain systems and project-specific impacts on such systems prior to approval by the Los Angeles County Public Works. As such, buildout of the FFTOD Specific Plan would not cause a substantial increase in stormwater runoff and would not result in flooding on- or off site with compliance of the Los Angeles County MS4 permit and site-specific allowable discharge rates. Impacts would be less than significant.

- **Impact HWQ-6:** *The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

Construction activities associated with the FFTOD Specific Plan would be required to comply with the NPDES permit that would include typical BMPs for erosion control, sediment control, and waste management. Operational activities associated with future development projects of the FFTOD Specific Plan would be required to meet MS4 permit requirements through compliance with the County LID Standards Manual. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for water agencies serving the FFTOD Specific Plan Area to substantially impact the groundwater aquifer. Therefore, implementation of the FFTOD Specific Plan would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

## 9. Land Use and Planning

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact LUP-1:** *The project would not 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.*

The FFTOD Specific Plan was developed in compliance with requirements of Government Code Sections 65450-65457 and outlines the regulatory, design, implementation, financing, and infrastructure framework to leverage transit investments in the Florence-Firestone Community. Per California State law, Specific Plans must be internally consistent with the jurisdiction's General Plan. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan; broader TOD and sustainability goals of Los Angeles County; and the FFCP. The FFTOD Specific Plan would also be consistent with and would not conflict with SCAG's regional planning goals and policies (i.e., the 2020-2045 RTP/SCS [Connect SoCal]). Therefore, implementation of the proposed project would not result in significant land use impacts.

## 10. Population and Housing

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact POP-1:** *The project would not 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).*

The population, housing, and employment projections with buildout of the FFTOD Specific Plan are greater than current projections identified by SCAG. This increase in population, housing, and employment projections is considered substantial. However, the FFTOD Specific Plan is consistent with SCAG's Connect SoCal goals for focusing higher-density development in transit-rich areas. The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMT, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. Furthermore, the

determination of whether the proposed growth represents a significant impact is whether the project would induce additional growth that would result in significant impacts to the environment.

The determination of whether the FFTOD Specific Plan would induce growth in the vicinity of the FFTOD Specific Plan Area or within Los Angeles County is based on whether the increase in population and housing in the FFTOD Specific Plan Area would increase the need for additional commercial or public services beyond the existing commercial or public services and the commercial services that would result as part of the project. In addition, a determination of inducement of growth is whether the increase in job growth in the FFTOD Specific Plan Area would increase the need for additional housing beyond the existing housing and the housing proposed as part of the project.

The exceedance of population and housing projection over an approximate 15-year period in the region is considered nominal because the growth within the FFTOD Specific Plan would represent 3 percent of Los Angeles County's incremental population growth and 3 percent of Los Angeles County's incremental residential growth. Furthermore, the FFTOD Specific Plan focuses on infill development within walking distance of the Metro A Line Slauson, Florence, and Firestone stations in an area that is presently completely built out, as described in Section 3.14 Transportation of the Draft EIR. The FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population. Therefore, the FFTOD Specific Plan would not induce substantial additional population and housing growth that would result in significant impacts to the environment.

The increase in jobs in the FFTOD Specific Plan Area represents 0.5 percent of the projected job growth in Los Angeles County for 2035. Furthermore, based on an average unemployment rate of 7.1 percent for Florence-Firestone and 5 percent for Los Angeles County (2016), it is reasonable to assume that there will be people living in Los Angeles County and the region available to fill the increase in jobs created in the FFTOD Specific Plan Area without a substantial amount of migration into the region that would require new housing beyond the available housing in the FFTOD Specific Plan Area, Los Angeles County, or region. Therefore, the increase in jobs would not induce additional growth that would result in significant impacts to the environment.

The FFTOD Specific Plan would not induce substantial unplanned population growth in an area, directly or indirectly. Impacts would be less than significant. Impacts would be less than significant.

- **Impact POP-2:** *The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.*

Buildout of the FFTOD Specific Plan would provide a net increase of 12,110 new residential dwelling units over existing conditions in the FFTOD Specific Plan Area. Future development projects pursuant to implementation of the FFTOD Specific Plan may result in temporary displacement of residents during construction activities. However, future development projects would occur sporadically at a parcel by parcel project level, the potential displacement of persons residing in an infill or redevelopment parcel would be short-term, and the project would result in a greater number of residential units to house residents of the area, including those that may be temporarily displaced. Therefore, impacts related to displacement of housing or people would be less than significant.

## 11. Public Services

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact PUB-1:** *The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.*

Buildout of the FFTOD Specific Plan would result in a net increase of approximately 42,518 additional people associated with approximately 12,110 net new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area. The increase in fire department staffing and equipment required to serve the buildout of the proposed Specific Plan would be accommodated by the existing fire stations, and new or physically altered fire protection facilities would not be required to serve the buildout of the Specific Plan. The Los Angeles Sheriff's

Department (LASD) calculates that buildout of the FFTOD Specific Plan would require approximately 42 additional deputies to serve the FFTOD Specific Plan Area. As future development occurs, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury, a portion of which would be allocated to the LASD to ensure adequate staffing and equipment are provided to adequately serve project-related increases in service-call demands.

Additionally, individual projects would require incorporation of fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code). These project design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits for each development project in the Specific Plan. Likewise, individual projects would also be reviewed by County and Sheriff Department staff prior to the developer's receipt of permits to ensure that appropriate security measures are included in each development (i.e., the general principles of Crime Prevention Through Environmental Design [CPTED]) and would be required to pay all applicable required law enforcement mitigation fees associated with the project. Impacts would be less than significant.

- **Impact PUB-2:** *The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered school, library, or other public facilities in order to maintain acceptable service ratios or other performance objectives.*

Buildout of the FFTOS Specific Plan is calculated to generate approximately 5,570 total students, consisting of 2,664 elementary school students, 1,211 middle school students, and 1,695 high school students. Projects developed under the Specific Plan would pay SB 50 school impact fees to the Los Angeles Unified School District (LAUSD). For every new residential development in the Specific Plan Area, developer fees would be collected and contributed towards LAUSD's funds to construct new or expand existing school facilities. Such fees are defined as full and complete mitigation for the impact of development projects on school facilities. Furthermore, school capacity and impact fee payment pursuant to implementation of the FFTOD Specific Plan would be assessed on a project-by-project basis. Impacts would be less than significant.

Buildout of the FFTOD Specific Plan is calculated to create a need for an additional 21,259 square feet of facility space, 116,925 collection items, and 43 public access computers. To minimize the impact of residential projects on library services, Los

Angeles County Library collects a one-time Library Facilities Mitigation Fee from developers at the time building permits are requested for all new residential dwellings located within the unincorporated areas of Los Angeles County served by Los Angeles County Library. The FFTOD Specific Plan is located in the Library's Planning Area 5-Southeast which requires $970 per dwelling unit. A calculated total of $11,746,700 of developer fees would be collected for development projects under the FFTOD Specific Plan based on 12,110 additional residential units. Use of such fees by Los Angeles County Library for construction of new and/or expanded library facilities would reduce project impacts on library facilities in the FFTOD Specific Plan Area. Impacts would be less than significant.

## 12. Recreation

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact REC-1:** *The project would not 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.*

Developers of residential units in the FFTOD Specific Plan Area would be required to provide the appropriate amount of parkland based on the proposed development size and allow public access to the parkland, or pay in-lieu fees that would go toward funding Los Angeles County acquisition of local park land or rehabilitation of existing recreational facilities. The FFTOD Specific Plan would also require developers provide publicly accessible open space based on the unit size or gross square feet depending on the development type.

As allowed by the Quimby Act and pursuant to the County Municipal Code, new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable Los Angeles County to maintain a ratio of three acres of local parkland for every 1,000 residents (Section 21.24.340). This provision ensures that when new residential subdivisions are developed, there is an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific

Plan and Los Angeles County Title 22. Therefore, the impact would be less than significant.

- **Impact REC-2:** *The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

It is likely that future developers of residential subdivisions in accordance with the FFTOD Specific Plan would pay in-lieu fees rather than provide new parkland to meet the Los Angeles County's local parkland standard, given the built-out nature of the FFTOD Specific Plan Area. In addition, there is no specific zone pertaining to park or open space use under the FFTOD Specific Plan. The FFTOD Specific Plan buildout would include pedestrian and bicycle infrastructure for mobility improvements. Pedestrian and bicycle infrastructure would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under the FFTOD Specific Plan. The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, the impact would be less than significant.

- **Impact REC-3:** *The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.*

Any new residential projects developed under the FFTOD Specific Plan would be required to fulfill parkland obligations to provide local park space and/or pay park facilities mitigation fees to Los Angeles County. Use of such fees for construction of new and/or expanded park facilities would reduce project impacts on park facilities. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific Plan. Therefore, the impact would be less than significant.

## 13. Transportation

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially

lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact TRA-1:** *The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.*

The FFTOD Specific Plan would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, including public transit, roadway, bicycle, or pedestrian facilities. Consistency analysis of the FFTOD Specific Plan with key guiding policy documents (i.e., Connect SoCal, the FFCP, the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County), which set the long-term direction of land use development and transportation in the region and for the Florence-Firestone community, is provided in Section 3.14 Transportation of the Draft EIR. This impact would be less than significant.

- **Impact TRA-2:** *The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).*

The FFTOD Specific Plan Scenario was analyzed using the SCAG 2016 RTP/SCS Travel Demand Forecast Model. Based on the results of the model analysis, the FFTOD Specific Plan scenario would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline. The study area demonstrates relative efficiency in terms of daily VMT per service population, compared to the Los Angeles County's South County Planning Area. The changes included in the FFTOD Specific Plan will further expand the ability for residents and employees to walk, bike, and take transit to complete the trips they need to make, resulting in greater VMT efficiency in terms of daily VMT per service population. These transportation and mobility improvements are included as project design features, but the Travel Demand Forecast Model is not sensitive to these improvements and therefore the VMT estimates do not reflect the actual VMT reduction benefits they may have. Overall, the FFTOD Specific Plan would not conflict with CEQA Guidelines section 15064.3, subdivision (b) related to VMT thresholds. This impact would be less than significant.

- **Impact TRA-3:** *The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*

The FFTOD Specific Plan does not propose any new roads or intersections. None of the transportation system improvements envisioned in the FFTOD Specific Plan would introduce new safety hazards or incompatible uses at intersections or along roadway segments, because most would be designed to improve safe circulation and access to the transit stations for all users. In addition, any new transportation facilities or improvements to facilities associated with the FFTOD Specific Plan would be constructed based on environmental analysis as well as future engineering review consistent with applicable Los Angeles County guidelines and practices, including—but not limited to—the California Manual on Uniform Traffic Control Devices, Caltrans Highway Design Manual, Los Angeles County Municipal Code, and best practices consistent with the Los Angeles County General Plan. Overall, the FFTOD Specific Plan would not substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant.

- **Impact TRA-4:** *The project would not result in inadequate emergency access.*

For the FFTOD Specific Plan Area, Los Angeles County will maintain a current evacuation plan; ensure that new and infill development is provided with adequate emergency and/or secondary access; require visible street name signage; and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. In addition, Los Angeles County and responsible emergency service agencies including the Los Angeles County Fire Department have emergency access and design standards that are based on the size and intensity of development. At the project level, design would meet all applicable emergency access and design standards and adequate emergency access would be provided. It is possible that during the construction phase of transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access to and within the FFTOD Specific Plan Area. Final transportation and mobility improvements are not anticipated to result in inadequate emergency access, and any effects on emergency access would be temporary in nature. Impacts would be less than significant.

## 14. Utilities and Service Systems

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR

evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact USS-4:** *The project would not 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.*

In 2014, the Los Angeles County Board of Supervisors adopted a Roadmap to a Sustainable Waste Management Future program. This roadmap outlines the process by which Los Angeles County can implement strategies to reduce solid waste generation in unincorporated areas and through Los Angeles County operations. The Florence-Firestone community is part of this program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, impacts would be less than significant.

- **Impact USS-5:** *The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

All solid waste-generating activities in Los Angeles County are subject to the requirements set forth in AB 939, which requires diversion of a minimum of 50 percent of construction and demolition debris. In addition, after 2020, development projects pursuant to the FFTOD Specific Plan will be required to divert 75 percent of solid waste pursuant to AB 341. Additionally, the Florence-Firestone community is part of the Los Angeles County Roadmap to a Sustainable Waste Management Future program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, existing landfills would be able to accommodate solid waste generated by buildout of the FFTOD Specific Plan and impacts to solid waste management facilities would be less than significant. Disposal of waste generated from implementation of the FFTOD Specific Plan would be consistent with all state regulations and the policies in the Los Angeles County Integrated Waste Management Plan. Impacts would be less than significant.

## 4.2 IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

Los Angeles County finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the Final EIR. These findings are based on the discussion of impacts in the detailed issue area analyses and cumulative impacts in Chapter 3 Environmental Analysis of the Draft EIR. An explanation of the rationale for each finding is presented below.

## 1. Air Quality

**Impact AQ-3:** *The project would expose sensitive receptors to substantial pollutant concentrations*.

As discussed in Section 3.2 Air Quality of the Draft EIR criteria air pollutant emissions associated with construction and operation of the FFTOD Specific Plan have the potential to exceed the SCAQMD thresholds of significance. Because implementation of the FFTOD Specific Plan would result in exceedances of the SCAQMD reactive organic gasses (ROG) and nitrogen oxides ($NO_x$) thresholds for construction and/or operation, the FFTOD Specific Plan could contribute to regional health effects associated with ozone, NOx and nitrogen dioxide ($NO_2$), and particulate matter (PM) emissions. However, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible. The SCAQMD has established conservative screening criteria (based on site-specific information) that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds (LSTs) and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. An LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level environmental analysis. Because potential redevelopment could occur close to existing sensitive receptors, the development that would be accommodated by the FFTOD Specific Plan has the potential to expose sensitive receptors to substantial pollutant concentrations of criteria pollutants. Therefore, this impact is potentially significant.

Additionally, heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with construction could generate diesel PM (DPM), which the CARB has identified as a toxic air contaminant (TAC). The exact duration and location of construction for development within the FFTOD Specific Plan Area with respect to sensitive receptors cannot be determined at the time of the program-level analysis. Therefore, it is conservatively assumed that certain construction activities would result in the exposure of sensitive receptors to substantial TAC concentrations. Similarly, due to uncertainty associated with specific development within each land use type identified within the FFTOD Specific Plan, it is possible that development within the FFTOD Specific Plan Area could generate substantial TAC emissions as a result of long-term operations. It is also possible that sensitive receptors could be located at distances from stationary sources that would expose them to substantial TAC concentrations. Therefore, this impact is considered potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-7 would reduce impacts related to substantial pollutant concentrations to a less than significant level. Emissions would be substantially reduced as a result of implementation of MM AQ-1 through MM AQ-3 and MM AQ-7. Implementation of MM AQ-4 would ensure that future development that could generate localized emissions during construction and operations would evaluate and mitigate emissions to ensure that sensitive receptors are not exposed to substantial localized concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known. MM AQ-1, MM AQ-5, and MM AQ-6 would reduce impacts to sensitive receptors associated with construction-related mobile emissions from construction equipment and operational TAC sources. In addition, implementation of MM AQ-6 would ensure that future development that could generate TAC emissions during construction and operations would evaluate and mitigate TAC emissions to ensure that sensitive receptors are not exposed to substantial TAC concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known.

**MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project

representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

**MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, $PM_{10}$-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection;
- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

**MM AQ-3** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings.

**MM AQ-4** For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;

- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**MM AQ-5** When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future.

**MM AQ-6** For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.

Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with

thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.

Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:

- Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;
- Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;
- Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing “No Idling” signs;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;
- Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet;
- Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;
- Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;

- Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;
- Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Rerouting construction trucks away from congested streets or sensitive receptor areas;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;
- Establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible;

- Using haul trucks with on-road engines instead of off-road engines;
- Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;
- Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and
- Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site.

**MM AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM AQ-1 through MM AQ-7 are feasible, finds that these mitigation measures will reduce the impacts related to substantial pollutant concentrations to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 2. Cultural Resources

**Impact CUL-2:** *The project may cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.*

Future development projects pursuant to implementation of the FFTOD Specific Plan could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The FFTOD Specific Plan Area is considered potentially sensitive for archaeological resources. Therefore, ground disturbance is considered to have a high potential for uncovering archaeological resources.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM CUL-2 would reduce impacts to archaeological resources to a less than significant level.

**MM CUL-2:** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be

avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM CUL-2 is feasible, finds that this mitigation measure will reduce the impact related to archaeological resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact CUL-3:** *The project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

Ground disturbance from future development projects pursuant to implementation of the FFTOD Specific Plan could damage fossils buried in soils. Abundant fossils occur in the older Quaternary alluvial deposits in the FFTOD Specific Plan Area. These deposits have produced numerous important fossil specimens. Therefore, the FFTOD Specific Plan Area contains significant, nonrenewable, paleontological resources that are considered to have high sensitivity.

Mitigation Measure

Implementation of Programmatic Mitigation Measure CUL-3 would reduce impacts to paleontological resources to a less than significant level.

**MM CUL-3:** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by

qualified paleontological personnel to have low potential to contain fossil resources.

If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM CUL-3 is feasible, finds that this mitigation measure will reduce the impact related to paleontological resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 3. Greenhouse Gases

**Impact GHG-1:** *The project may generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

The amortized construction-related total and net increase of GHG emissions that are associated with the buildout of the FFTOD Specific Plan (i.e., 2.55 metric tons of carbon dioxide equivalent [MT CO2e]) would exceed the local service population efficiency 2035 target of 2.36 MT $CO_2e$. Therefore, the FFTOD Specific Plan's cumulative contribution to the long-term GHG emissions in the state would be considered potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure AQ-7 would reduce impacts related to greenhouse gases to a less than significant level.

**MM AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM AQ-7 is feasible, finds that this mitigation measure will reduce the impacts related to greenhouse gases to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 4. Hazards and Hazardous Materials

**Impact HAZ-2:** *The project may create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.*

The demolition of buildings has the potential to expose and disturb asbestos containing materials (ACMs) and lead-based paint (LBP). Demolition can cause encapsulated ACMs (if present) to become friable; they are considered a carcinogen once airborne. Demolition of the existing buildings and structures can also release lead into the air if LBP is not properly removed and handled. Such releases could pose significant risks to people living and working in and around the project site as well as to project construction workers. Abatement of all ACM and LBP encountered during any future building demolition would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and SCAQMD.

Cal/OSHA regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, as well as the safe demolition of buildings containing LBP or other lead materials. In addition, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of CCR Title 8, Section 1532.1 (Lead), which establishes exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. The potential exposure of construction workers to ACMs or LBP is a potentially significant impact.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HAZ-1 would reduce impacts related to ACMs or LBP to a less than significant level.

**MM HAZ-1** Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HAZ-1 is feasible, finds that this mitigation measure will reduce the impacts related to a release of hazardous materials into the environment to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact HAZ-4:** *The project may be situated on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 which may create a potentially significant hazard to the public or the environment as a result.*

Lists of hazardous materials sites found on lists compiled pursuant to Government Code Section 65962.5 that occur within or in the vicinity of the FFTOD Specific Plan Area are provided in Table 3.7-1 and Table 3.7-2 of the Draft EIR. A list of 116 sites within the FFTOD Specific Plan Area that have varying degrees of known contamination or reasons to investigate further is provided in Table 3.7-1. These sites include state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. The list also includes sites that are being investigated for suspected but unconfirmed contamination. A list of the 15 sites within the FFTOD Specific Plan Area that could affect groundwater quality is provided in Table 3.7-2. Future redevelopment of individual properties within the FFTOD Specific Plan Area could have unknown recognized environmental conditions related to soils, groundwater, and vapors/gases that could create a significant hazard to the public or the environment.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HAZ-2 would reduce impacts related to hazardous materials sites to a less than significant level.

**MM HAZ-2** Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II

ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.

Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.

Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. The County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HAZ-2 is feasible, finds that this mitigation measure will reduce the impacts related to hazardous materials sites to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 5. Hydrology and Water Quality

**Impact HWQ-5:** *The project may substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner that would create or contribute to runoff water and exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

The FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. However, although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of

capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HYD-1 would reduce impacts to drainage capacity to a less than significant level.

**MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HYD-1 is feasible, finds that this mitigation measure will reduce the impacts related to drainage capacity to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 6. Noise

**Impact NOI-1:** *The project may result in the 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.*

As future development projects pursuant to the implementation of the FFTOD Specific Plan are proposed adjacent to—and in the immediate vicinity of—the LA Metro A Line (Blue) Stations, the noise generated by trains traveling through the FFTOD Specific Plan

Area could, depending on distance, potentially expose new residential uses to excessive rail noise. The Federal Transit Authority (FTA)'s Screening Distance for Noise Assessments should be considered whenever siting these new uses in proximity to the rail alignment. For light rail transit, the screening distance for noise assessment is 350 feet for proposed construction with an unobstructed line of sight to the alignment and 175 feet for those with an obstructed line of sight. Because the FFTOD Specific Plan aims to focus residential development within these distances of existing LA Metro A Line stations, there is potential for the project to expose future noise-sensitive land uses to excessive noise levels and is thus potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure NOI-1 would reduce impacts related to excessive noise to a less than significant level.

**MM NOI-1** At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:

- Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County' exterior noise standards.
- For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM NOI-1 is feasible, finds that this mitigation measure will reduce the impacts related to noise to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact NOI-2:** *The project may result in the generation of excessive groundborne vibration or groundborne noise levels.*

As future development projects would be spread over the FFTOD Specific Plan's 15-year build-out period and construction events are short-term in nature, it is anticipated that there would be an infrequent amount of vibration events at sensitive land use receptors. However, depending on how close an actual receptor location is to a construction site, the type of construction equipment and the type of receptor building (e.g., older residential buildings, modern commercial buildings), the vibration levels at a receptor location could exceed the vibration threshold for structural damage. As such, vibration impacts during construction associated with the FFTOD Specific Plan could be potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure NOI-2 would reduce impacts related to vibration to a less than significant level.

**MM NOI-2** At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM NOI-2 is feasible, finds that this mitigation measure will reduce the impacts related to vibration to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 7. Tribal Cultural Resources

**Impact TCR-1:** *The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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 listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).*

**Impact TCR-2:** *The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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 PRC Section 5024.1*

In accordance with AB 52 and SB 18 requirements, Los Angeles County sent invitation letters to representatives of the nine Native American contacts provided by the Native American Heritage Commission (NAHC) on March 11, 2021, formally inviting tribes to consult with Los Angeles County on the project. The intent of the consultations is to provide an opportunity for interested Native American contacts to work with Los Angeles County during the project planning process to identify and protect tribal cultural resources. Los Angeles County received two responses via email: one response from the Fernandeno Tatavium Band of Mission Indians noted that the FFTOD Specific Plan Area is outside the Fernandeno Tatavium Band of Mission Indians ancestral Tribal boundaries and deferred consultation for the Project to members of the Gabrieleno Indian Tribe; the other response, from the Gabrieleno Band of Mission Indians – Kizh Nation, declined to consult at the time because no immediate ground disturbance would be taking place; however the tribal contact requested to be notified regarding ground disturbance of future development projects. No other tribes responded to Los Angeles County's notification letter.

There are no known tribal cultural resources in the FFTOD Specific Plan Area, but ground-disturbing activities have the potential to cause a substantial adverse change in the significance of tribal cultural resources of a California Native American tribe. Each future development project in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes (which would include follow up with the Gabrieleno Band of Mission Indians – Kizh Nation). Where significant impacts to tribal cultural resources are identified, future development projects would be required to either avoid impacts or implement feasible mitigation measures to reduce impacts.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM CUL-1 through MM CUL-3 would reduce impacts related to tribal cultural resources to less than significant levels.

**MM CUL-1** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI

Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

**MM CUL-2:** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources,

including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

**MM CUL-3:** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate

Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM CUL-1 through MM CUL-3 are feasible, finds that these mitigation measures will reduce the impacts related to tribal cultural resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 8. Utilities and Service Systems

**Impact USS-1:** *The project may 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*

Any future development project having a direct connection to the sewer system would require a sewer analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades. Additionally, any future development project having a direct connection to the Hooper Avenue Drain or that is tributary to the Glen Avenue Drain would

require a drainage analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades. Also, new development or redevelopments would be responsible for upgrades and undergrounding of electrical transmission lines as determined by Southern California Edison (SCE) in coordination with California Public Utilities Commission (CPUC) and Los Angeles County Public Works after building plan submittal.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM USS-1 through MM USS-3 and MM HYD-1 would reduce impacts related to water supply, sewer, stormwater drainage, and electricity to less than significant levels.

**MM USS-1** Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.

The Golden State Water Company Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations.

**MM USS-2** Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity.

**MM USS-3** New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and

more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.

CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." The following are "Public Interest" criteria:

- Eliminate an unusually heavy concentration of overhead lines
- Involve a street or road with a high volume of public traffic
- Benefit a civic or public recreation area or area of unusual scenic interest
- Be listed as an arterial street or major collector as defined by the governor's OPR Guidelines

Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year "borrow forward" if required), and the creation of a utility underground district.

The following areas deserve some consideration for a Rule 20A undergrounding process:

- Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit.
- Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit.
- Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area.

- Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area.

**MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM USS-1 through MM USS-3 and MM HYD-1 are feasible, finds that these mitigation measures will reduce the impacts related to utilities and service systems to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact USS-2:** *The project may have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.*

While demand for water supply would increase, this anticipated increase would be slightly offset by decreased demand based on conversion of existing industrial uses to mixed use format development. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under build-out of the FFTOD Specific Plan. Increases in residential density would result in increased potential water usage including potable water and fire prevention demand. To service this, the water facility upgrades described in Section 3.16 Utilities and Service Systems of the Draft EIR would be recommended if increased density develops at the locations noted; all other installed water facilities appear to be sufficient for current and proposed buildout.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM USS-1 (listed above) would reduce impacts related to water supply to a less than significant level.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM USS-1 is feasible, finds that this mitigation measure will reduce impacts related to water supply to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact USS-3:** *The project may result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

A preliminary analysis was performed using available information that shows that the existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition. Several locations are exceptions that may require upgrading based on the level of density/intensity realized in the vicinity. Individual project applicants/developers would need to prepare a sewer analysis, that is part of an individual infrastructure assessment, and consult with Los Angeles County Public Works and Consolidated Sewer Maintenance District (CSMD) regarding future sewer facilities or upgrade considerations. The CSMD would evaluate all development that would occur and conduct its own site-specific analysis of changes to the service trunk and necessary sewer infrastructure upgrades. Additionally, new sewer laterals would be required for new buildings.

Mitigation Measures

Implementation of Programmatic Mitigation Measure USS-2 (listed above) would reduce impacts related to wastewater to a less than significant level.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM USS-2 is feasible, finds that this mitigation measure will reduce impacts related to wastewater to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

# 4.3 SIGNIFICANT UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible, or mitigation would not lessen impacts to less than significant. The following impact would remain significant and unavoidable:

1. **Air Quality**

**Impact AQ-1:** *The project would conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD).*

Despite furthering the regional transportation and planning objectives included within the RTP/SCS and air quality management plan (AQMP), the FFTOD Specific Plan would represent a substantial increase in emissions compared to existing conditions and would exceed SCAQMD's regional operational significance thresholds. As a result, the FFTOD Specific Plan could potentially exceed the assumptions in the AQMP and would not be considered consistent with the AQMP. Therefore, impacts related to conflicts with or obstructing implementation of applicable air quality plans of the SCAQMD would be potentially significant.

Mitigation Measure

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional mitigation measures to reduce these air quality impacts to below a level of significance. Therefore, this impact is significant and unavoidable.

**MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

**MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, $PM_{10}$-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling

dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection;

- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

**MM AQ-3** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings.

**MM AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional mitigation measures to reduce these air quality impacts to below a level of significance. Impact AQ-1 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

**Impact AQ-2:** *The project would result in a cumulatively considerable net increase of criteria pollutants (VOC, NOx, PM10, and PM 2.5) for which the project region is nonattainment (O3) under an applicable federal or state ambient air quality standard.*

Construction activities associated with the FFTOD Specific Plan could potentially exceed the SCAQMD regional thresholds for volatile organic compounds (VOC), NOx, particulate matter with a diameter of 10 microns or less ($PM_{10}$), and particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$). Additionally, the operational phase of the FFTOD Specific Plan at buildout (and potentially overlapping construction and operational activities) would generate air pollutant emissions that exceed SCAQMD's regional significance thresholds for all criteria air pollutant emissions, except sulfur oxides ($SO_x$). Emissions of VOC, NOx, carbon monoxide (CO), $PM_{10}$, and $PM_{2.5}$ that exceed the SCAQMD regional threshold would cumulatively contribute to the ozone, $PM_{10}$, and $PM_{2.5}$ nonattainment designation of the Southern California Air Basin (SCAB).

While buildout of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions, emissions associated with construction and operation of future development of the FFTOD Specific Plan could exceed or contribute substantially to an existing or projected air quality violation. Therefore, implementation of the FFTOD Specific Plan would result in a significant impact because it would significantly contribute to the nonattainment designations of the SCAB. This impact would be potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 (listed above) would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. Implementation of MM AQ-1 through MM AQ-3 would substantially reduce PM and ozone precursor emissions to levels below the SCAQMD thresholds of significance; however, emissions estimates of the overlapping construction and operational activities would continue to exceed the SCAQMD thresholds of significance. Therefore, it is conservatively assumed that construction-related emissions could exceed significance thresholds and, this is impact is significant and unavoidable. Implementation of MM AQ-7 would ban fireplaces in new residential development, and thereby reduce operational emissions of VOC, NOx, and PM. Mitigated emissions are substantially reduced compared to the unmitigated estimates. However, although implementation of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions emission estimates, the operational emissions would continue to exceed the SCAQMD thresholds of significance. In addition, because the specific development projects within the FFTOD Specific Plan Area cannot be

defined at the time of this analysis, precise effectiveness and feasibility of additional measures cannot be determined for individual future projects, and operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures available to address this impact. Therefore, this impact is significant and unavoidable.

Finding: Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures to reduce these air quality impacts to below a level of significance. Impact AQ-2 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

## 2. Cultural Resources

**Impact CUL-1:** *The project may potentially cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.*

Identified historic structures and sites that are eligible or potentially eligible for National Register of Historic Places (NRHP) listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

In addition to the historic resources identified in the Draft EIR, there are numerous other residential and commercial buildings within the FFTOD Specific Plan Area that are older than 50 years (or could reach 50 years and become wroth of consideration during the planning period for the FFTOD Specific Plan). As these structures have not been comprehensively surveyed and evaluated, it is possible that they may be eligible as historic resources if other criteria apply, such as significant associations with important events, people, or have high architectural merit. Therefore, future development projects pursuant to implementation of the FFTOD Specific Plan could adversely affect other historical resources not identified in the Draft EIR. The impact to a historical resource is considered significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. There are no additional mitigation measures to reduce this impact to historical resources to below a level of significance. This is considered a significant unavoidable adverse impact.

**MM CUL-1** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and

specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

Finding: Implementation of Programmatic Mitigation Measure MM CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. There are no additional mitigation measures to reduce this impact to historical resources to below a level of significance. Impact CUL-1 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

# 5.0 ALTERNATIVES TO THE PROPOSED PROJECTS

## 5.1 ALTERNATIVES CONSIDERED AND WITHDRAWN

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, greenhouse gas emissions, land use and planning, noise, population and housing, public services, recreation, transportation, and utilities and service systems. Without a site specific analysis, impacts on aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources cannot be evaluated. Therefore, another location would not avoid or substantially lessen the effects of the proposed project.

As part of the Los Angeles County General Plan Update, Los Angeles County identified several urban and suburban areas with access to major transit and commercial corridors as priority policy areas for infill development. Alternative sites were not selected for evaluation because the primary purpose of the project is to implement the Los Angeles County General Plan 2035 TOD Program, which is intended to focus on the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, there are three LA Metro A Line Stations (the Slauson, Florence, and Firestone Stations) and the purpose of the project cannot be met by focusing on alternative sites. The FFTOD Specific Plan Area was identified as one of the priority areas for the TOD Program as it is well suited for higher density housing and a mix of uses surrounding existing major commercial, employment, and civic activity nodes served by high-quality transit. The Specific Plan can leverage the community of Florence-Firestone's assets, connecting uses and activities, and attracting future investment. The LA Metro Stations' (Slauson, Florence, and Firestone Stations) proximity to major job centers and regional destinations spanning downtown Los Angeles to Long Beach creates many opportunities for improving the built environment and overall community that other locations would not be able to provide.

Overall, the purpose of the FFTOD Specific Plan is to create a land use and zoning policy tool to enable more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations, and reduce vehicle miles traveled by cars. The Specific Plan development standards and strategies are designed to balance TOD development with community benefits that support a wide range of residents, workers, and small business owners. The land use and mobility concepts focus on improving the connection between the community and the three LA Metro transit stations.

Finding: Los Angeles County finds that an alternative location for the proposed project is infeasible and/or would not meet most project objectives, for the reasons detailed in Section 4.0 Alternatives of the Draft EIR.

## 5.2 ALTERNATIVES FURTHER EVALUATED

The Draft EIR analyzed the following three alternatives:

- Alternative 1: No Project/Development in Accordance with Existing Zoning
- Alternative 2: Firestone TOD Modified Land Use
- Alternative 3: Slauson TOD Focused

Community-wide information regarding dwelling units, population, population per household, nonresidential square footage, and employment projections for each of the alternatives is provided in Table 5.2-1

**Table 5.2-1: FFTOD Specific Plan Area Future Condition (2035)**

| | Units (Households) | Population | Population / Household | Nonresidential Square Feet | Total Employment |
|---|---|---|---|---|---|
| **Proposed Project** | 25,532 | 100,423 | 3.9 | 1,497,753 | 11,408 |
| **Alternative 1: No Project/Development in Accordance with Existing Zoning** | 14,911 | 66,072 | 4.4 | 2,061,510 | 9,591 |
| **Alternative 2: Firestone TOD Modified Land Use** | 25,596 | 101,308 | 4.0 | 1,546,348 | 11,520 |
| **Alternative 3: Slauson TOD Focused** | 22,848 | 91,253 | 4.0 | 1,169,894 | 10,651 |

### 1. Alternative 1: No Project/Development in Accordance with Existing Zoning

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 1 would reduce impacts to public services, recreation, and utilities and service systems. Impacts to transportation would be greater and impacts to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain. The alternative would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system.

The implementation of this alternative would result in less environmental impacts compared to the proposed project and would not be able to achieve as many of the project objectives as the FFTOD Specific Plan. This alternative would not result in changes to existing zoning or meet the objectives of enabling more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone), or reduce vehicle miles traveled because these improvements would not be comprehensively and cohesively implemented in accordance with a uniform design guideline such as the proposed FFTOD Specific Plan.

Finding: Los Angeles County finds that Alternative 1: No Project/Development in Accordance with Existing Zoning, is infeasible because although it would result in less environmental impacts compared to the proposed project for a number of environmental resource categories, it would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system and it would meet fewer of the project objectives and would not realize all the benefits of implementation of the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

**2. Alternative 2: Firestone TOD Modified Land Use**

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 2 would not reduce any impacts and would have greater impacts to air quality, greenhouse gases, noise, recreation, and utilities and service systems. Impacts to aesthetics, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain.

The implementation of this Alternative would result in slightly greater environmental impacts compared to the proposed project. This Alternative would meet all of the objectives of the proposed project including the provision of a transit-oriented development in the project area and provision of an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements and would allow for expanded density through the implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street.

Finding: Los Angeles County finds that Alternative 2: Firestone TOD Modified Land Use, is infeasible because it would result in slightly greater environmental impacts compared to the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

**3. Alternative 3: Slauson TOD Focused**

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 3 would reduce impacts to air quality, cultural resources, greenhouse gases, noise, public services, recreation, and utilities and service systems. Alternative 3 would not have any impacts greater than the proposed project. Impacts to aesthetics, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain but be reduced compared to the proposed project.

The implementation of this Alternative would result in less environmental impacts compared to the proposed project. Alternative 3 would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. This Alternative would meet most of the objectives of providing a transit oriented development in the FFTOD Specific Plan Area and providing an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements.

Finding: Los Angeles County finds that Alternative 3: Slauson TOD Focused, is infeasible because although it is environmentally superior to the proposed project, it would meet fewer of the project objectives and would not realize all the benefits of implementation of the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

# 6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency's statement is referred to as a "Statement of Overriding Considerations." The following sections provide a description of the project's significant and unavoidable adverse impacts and the justification for adopting a statement of overriding considerations.

## 6.1 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Pursuant to Public Resources Code Section 21081(b) and Guidelines Section 15093, Los Angeles County has balanced the benefits of the proposed project against the following unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures with respect to these impacts: (1) air quality; and (2) cultural resources. Los Angeles County also has examined alternatives to the proposed project, none of which both meets the project objectives to the same extent as the proposed project and is environmentally preferable to the proposed project.

Los Angeles County declares that it has adopted mitigation measures to reduce all of the proposed project's environmental impacts to an insignificant level, other than the following:

1. **<u>Air Quality</u>**

   **Impact AQ-1**

   Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. However, impact AQ-1 would remain significant and unavoidable.

   **Impact AQ-2**

   Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. However, impact AQ-2 would remain significant and unavoidable.

**2. Cultural Resources**

**Impact CUL-1**

Programmatic Mitigation Measure CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. Impact CUL-1 would remain significant and unavoidable.

# 7.0 CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the proposed project that outweigh the proposed project's unavoidable adverse effects and provides specific reasons for considering the proposed project acceptable even though the Final EIR has indicated that there will be significant impacts to air quality and cultural resources. Accordingly, this Statement of Overriding Considerations regarding potentially significant adverse environmental impacts resulting from the proposed project, as set forth below, has been prepared. Pursuant to CEQA Guidelines §15093(c), the Statement of Overriding Considerations will be included in the record of the project approval and will also be noted in the Notice of Determination. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the proposed project.

**Provides Employment Opportunities for Highly Skilled Workers:**

FFTOD Specific Plan implementation will provide employment opportunities for a highly skilled workforce during both the construction and operation phases. Buildout of the FFTOD Specific Plan is estimated to generate 2,734 new jobs over existing conditions. Construction of future development projects pursuant to implementation of the FFTOD Specific Plan would also generate employment. Construction would involve multiple projects over an approximately 15-year buildout period; thus, construction employment is not estimated here. The construction effort of all future development projects would involve development of net increases of about 12,110 residential units and 1,183,013 square feet of nonresidential land uses.

**Reduce Vehicle Miles Traveled:**

Implementation of FFTOD Specific Plan would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline, which is consistent with goals to reduce passenger VMT in SCAG's 2020-2045 RTP/SCS.

**Sustainability:**

A key component of the FFTOD Specific Plan is transforming the current circulation network, which largely supports vehicular travel, into a network that places a higher priority on transit, pedestrian, and bicycle mobility, as well as programmatic improvements to support complete streets and improve parking conditions. Streetscape improvements are intended to transform the auto-oriented streetscape into more sustainable, multimodal design. They include elements such as wider sidewalks, bicycle and transit facilities and amenities, landscaping and street trees, and lighting.

**Implements the Objectives Established for the Proposed Project:**

The FFTOD Specific Plan provides comprehensive direction for the development of the Specific Plan Area by establishing transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County TOD Program of the Los Angeles County 2035 General Plan. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

Overall, the purpose of the FFTOD Specific Plan is to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility. The FFTOD Specific Plan facilitates increased housing opportunities and employment-generating uses proximate to the Slauson, Florence, and Firestone TOD station areas to take advantage of the significant local and regional transit services already provided in the area. The proposed pedestrian, bicyclist, and transit-focused improvements throughout the FFTOD Specific Plan Area would help create an opportunity for redevelopment of unique high-quality transit areas in the Florence-Firestone community.

Thus, FFTOD Specific Plan implementation would achieve the five objectives established for the proposed project:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

**Conclusion**

In balancing the benefits of the overall project described above with the proposed project's unavoidable and significant adverse environmental impacts, Los Angeles County finds that the proposed project's benefits individually and collectively outweigh the unavoidable adverse

impacts, such that these impacts are acceptable. Los Angeles County further finds that substantial evidence presented in the Final EIR supports adopting the Final EIR despite the proposed project's potential adverse impacts.

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Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Slauson Station TOC Specific Plan, aka Florence-Firestone TOD Specific Plan

# Mitigation Monitoring and Reporting Program

December 2021

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# MITIGATION MONITORING AND REPORTING PROGRAM

# 1.0 INTRODUCTION

## 1.1 PURPOSE OF MITIGATION MONITORING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to monitor mitigation measures outlined in the Draft Environmental Impact Report (Draft EIR), State Clearinghouse No. 2021030300. The MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code. Section 21081.6 states:

a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:

    1. The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate, or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so, requested by the lead or responsible agency, prepare, and submit a proposed reporting or monitoring program.

    2. The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

## 1.2 EIR SUMMARY

### 1.2.1 Project location

The proposed FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west

by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

## 1.2.2 Project Description

The FFTOD Specific Plan would establish transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5-mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit-oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

## 1.3 ENVIRONMENTAL IMPACTS

### 1.3.1 Impacts Considered Less Than Significant

The Draft EIR identified various thresholds from the CEQA Guidelines among a number of environmental categories that would not be significantly impacted by the FFTOD Specific Plan and therefore did not require mitigation. Impacts to the following environmental resources were found to be less than significant:

- Aesthetics
- Energy
- Geology and Soils
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Transportation

### 1.3.2 Potentially Significant Impacts that Can Be Mitigated, Avoided, or Substantially Lessened

The following were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures:

- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Tribal Cultural Resources
- Utilities and Service Systems

### 1.3.3 Unavoidable Significant Adverse Impacts

The following impacts were identified as Significant and Unavoidable in the Draft EIR:

- Air Quality
- Cultural Resources

# 2.0 MITIGATION MONITORING REQUIREMENTS

## 2.1 LOS ANGELES COUNTY

Los Angeles County is responsible for implementation of the MMRP, with the Los Angeles County Department of Regional Planning (DRP) as lead in coordination. The MMRP will be used by Los Angeles County staff responsible for ensuring compliance with mitigation measures associated with the proposed FFTOD Specific Plan. Monitoring will consist of review of appropriate documentation, such as plans, or reports prepared by the party responsible for implementation or by field observation of the mitigation measure during implementation.

As discussed in the Draft EIR, this EIR is a program EIR prepared in accordance with CEQA Guidelines Section 15168. Although the legally required contents of a program EIR are the same as for a project EIR, program EIRs are typically more conceptual than project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, later activities in the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, many later activities may be within the program EIR's scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a lead agency relies on a program EIR for a later activity, it must incorporate feasible mitigation measures and alternatives from the program EIR into the later activities (Guidelines Section 15168[c][3]). If a later activity would have effects outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis.

The mitigation measures described in this document are for a program-level decision (referred to as "programmatic mitigation measures") and are intended to be used to avoid, minimize, or reduce potentially significant environmental impacts of future development projects pursuant to implementation of the FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from this EIR. As part of these second-tier environmental reviews, the individual project applicants, in coordination with Los Angeles County, will use the programmatic mitigation measures identified in this program document as starting points to determine their applicability to a specific project and to develop additional or more specific mitigation measures (as necessary) for significant adverse impacts identified in the project-specific analysis associated with their specific location and type of action. The CEQA monitoring process includes review, guidance, and reporting components. For second tier documents individual project applicants, in coordination with Los Angeles County, will note which applicable programmatic mitigation measures are being adopted and used and explain why others are not. Individual project applicants will, in coordination with Los Angeles County, provide a schedule for implementing the adopted mitigation measures and for reviewing the implementation of those measures.

Table 2.1-1 (Mitigation Monitoring and Reporting Program) identifies the programmatic mitigation measures by resource area. The table also identifies other mitigation monitoring requirements, including action(s) required, timing of monitoring activity, and the responsible and monitoring agency or party.

**Table 2.1-1: Mitigation Monitoring and Reporting Program (MMRP)**

| # | Environmental Factor | Mitigation | Action Required | When Monitoring to Occur | Responsible Agency or Party | Monitoring Agency or Party |
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| 3.1 | Aesthetics | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.2 | Air Quality | **MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.<br><br>Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.<br><br>Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449. | Use of Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower; Maintenance of a list of all operating equipment with make, model, and number; restriction of non-essential idling of construction equipment to 5 minutes or less. | Prior to issuance of building permit and throughout construction (during normal construction site inspections) | Project Engineer and Construction Contractor | Los Angeles County |
| 3.2 | Air Quality | **MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.<br><br>• Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;<br>• During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, PM10-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;<br>• During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection; | Compliance with SCAQMD Rule 403 | Throughout construction (during normal construction site inspections) | Project Engineer and Construction Contractor | Los Angeles County |

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| | | | • During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and<br>• During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour. | | | | |
| 3.2 | Air Quality | **MM AQ-3** | Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings. | Use of water-based or "super-compliant" low VOC paints | Prior to issuance of building permit | Project Engineer and Construction Contractor | Los Angeles County |
| 3.2 | Air Quality | **MM AQ-4** | For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:<br>• Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;<br>• Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);<br>• Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;<br>• Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;<br>• Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;<br>• Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;<br>• Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);<br>• Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and<br>• Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations. | Localized criteria pollutant emissions modeling | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| 3.2 | Air Quality | **MM AQ-5** | When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future. | Compliance with CARB's Handbook guidance with regard to sources of TAC emissions. | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.2 | Air Quality | **MM AQ-6** | For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.<br><br>Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.<br><br>Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:<br><br>• Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;<br>• Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;<br>• Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing "No Idling" signs;<br>• Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);<br>• Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;<br>• Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;<br>• Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy; | Site-specific TAC emissions analysis | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| | | • Evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet;<br>• Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;<br>• Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;<br>• Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;<br>• Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;<br>• Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and<br>• Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.<br><br>If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:<br><br>• Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;<br>• Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);<br>• Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;<br>• Rerouting construction trucks away from congested streets or sensitive receptor areas;<br>• Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;<br>• Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;<br>• Establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible;<br>• Using haul trucks with on-road engines instead of off-road engines;<br>• Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;<br>• Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and | | | | |

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| | | | • Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site. | | | | |
| 3.2 | Air Quality | **MM AQ-7** | Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit. | Fireplace restriction | Prior to issuance of building permit | Property Owner/Developer | Los Angeles County |
| 3.3 | Cultural Resources | **MM CUL-1** | For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.<br><br>The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.<br><br>While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress. | Historical resources assessment and SOI Standards for treatment and HABS documentation (as applicable) | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| 3.3 | Cultural Resources | **MM CUL-2** | Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.<br><br>Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County's approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.<br><br>During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. | Phase I cultural resources inventory and if prehistoric or historic subsurface cultural resources are discovered | As part of second-tier environmental review of an individual future development project<br><br>Upon discovery of prehistoric or historic subsurface cultural resources during future ground-disturbing activities of a project | Applicant/Developer<br><br>Construction contractor and qualified archaeologist. | Los Angeles County |

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| 3.3 | Cultural Resources | **MM CUL-3** | Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.<br><br>If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.<br><br>Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.<br><br>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.<br><br>A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place. | Ground-disturbing activities in native soils or sediments at 5 feet or below ground surface<br><br>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage<br><br>Preparation of monitoring and mitigation report of findings and significance | Ground-disturbing activities in native soils or sediments at 5 feet or below ground surface | Construction contractor and qualified paleontologist/ paleontological monitor | Los Angeles County |
| 3.4 | Energy | No programmatic mitigation measures are required. | | n/a | n/a | n/a | n/a |

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| 3.5 | Geology and Soils | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.6 | Greenhouse Gases | Refer to Programmatic Mitigation Measure MM AQ-7. | n/a | n/a | n/a | n/a |
| 3.7 | Hazards and Hazardous Materials | **MM HAZ-1** Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant. | ACM and LBP inspection/survey | Prior to issuance of a demolition permit | Applicant/Developer | Los Angeles County |
| 3.7 | Hazards and Hazardous Materials | **MM HAZ-2** Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.<br><br>Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.<br><br>Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed. | Phase I ESA | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.8 | Hydrology and Water Quality | **MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements. | Site-specific infrastructure assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County Public Works |

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| 3.9 | Land Use and Planning | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.10 | Noise | **MM NOI-1** At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:<br>• Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County' exterior noise standards.<br>• For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment. | Preparation of acoustical assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.10 | Noise | **MM NOI-2** At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment. | Preparation of a vibration assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.11 | Population and Housing | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.12 | Public Services | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.13 | Recreation | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.14 | Transportation | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.15 | Tribal Cultural Resources | Refer to Programmatic Mitigation Measures MM CUL-1 through MM CUL-3. | n/a | n/a | n/a | n/a |
| 3.16 | Utilities and Service Systems | **MM USS-1** Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.<br>The Golden State Water Company Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations. | Site-specific infrastructure assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| 3.16 | Utilities and Service Systems | **MM USS-2** | Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity. | Site-specific infrastructure assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County Public Works |
| 3.16 | Utilities and Service Systems | **MM USS-3** | New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.<br><br>Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.<br><br>CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." The following are "Public Interest" criteria:<br><br>• Eliminate an unusually heavy concentration of overhead lines;<br>• Involve a street or road with a high volume of public traffic;<br>• Benefit a civic or public recreation area or area of unusual scenic interest; and<br>• Be listed as an arterial street or major collector as defined by the governor's OPR Guidelines<br>Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year "borrow forward" if required), and the creation of a utility underground district.<br><br>The following areas deserve some consideration for a Rule 20A undergrounding process:<br><br>• Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit;<br>• Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit;<br>• Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area; and | Coordination with SCE, CPUC, and Los Angeles County Public Works regarding undergrounding of electrical distribution lines | Following building plan submittal | Applicant/Developer | Los Angeles County Public Works |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | • Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area. | | | | |

# 3.0 REPORT PREPARATION

## 3.1 LIST OF PREPARERS

### 3.1.1 Lead Agency

Los Angeles County Department of Regional Planning

*320 W. Temple Street, Los Angeles, CA 90012, Phone: (213) 974-6316*

Patricia Hachiya, *Supervising Regional Planner*

Richard Marshalian, *Senior Regional Planner*

### 3.1.2 MMRP Consultants

AECOM

*300 S. Grand Avenue, 9th Floor, Los Angeles, CA 90071, Phone: (213) 593-8100*

Susan Ambrosini, *Project Director*

Nicholle Wright, *Project Manager*

Rachel Lindt, *Deputy Project Manager*

Nathan Counts, *CEQA Lead*

Allie Beauregard, *Environmental Planner*

Trina Meiser, *Architectural Historian*

Monica Wilson, *Cultural Planner*

Paola Pena, *Air Quality Specialist*

Chris Kaiser, *Noise Specialist*

Kelsey Tranel, *Technical Editing and Word Processing*

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**SUMMARY OF PROCEEDINGS**
**REGIONAL PLANNING COMMISSION**
**FLORENCE-FIRESTONE TRANSIT ORIENTED DISTRICT SPECIFIC PLAN**
**PROJECT NO. 2020-003127-(2)**
**ADVANCE PLANNING CASE NO. RPPL2020009556**
**GENERAL PLAN AMENDMENT NO. RPPL2021002373**
**ENVIRONMENTAL ASSESSMENT NO. RPPL2020009523**

On January 19, 2022, the Regional Planning Commission (Commission) conducted a duly-noticed public hearing to consider the Florence-Firestone Transit Oriented District Specific Plan (Project), which includes a new Specific Plan, establishment of nine new zones, changes to zoning and land use throughout the unincorporated community of Florence-Firestone, changes to the Florence-Firestone Community Plan, rescinding of the existing Florence-Firestone Community Standards District, and adoption of the design and development standards of Chapter 4 of the Specific Plan.

After the staff presentation, the Commission expressed support for increased housing density along corridors that are accessible to transit, in that it would support access to employment and job centers. Two testifiers expressed concern over parking and density issues being exacerbated by the Project's proposed land use and zoning changes.

The Commission inquired whether the Project addresses infrastructure to support the increased densities or impacts to emergency response times. Staff responded that there are plans to prepare a capital improvement plan for the Metro Planning Area, which includes Florence-Firestone, and that the forthcoming Safety Element Update addresses emergency response at the regional level.

The Commission closed the public hearing and recommended approval of the Project, with staff's proposed changes.

**VOTE:**

Concurring: Commissioners Duarte-White, Hastings, Louie, Moon

Dissenting: None

Abstaining: None

Action Date: January 19, 2022

**FINAL RESOLUTION**
**COUNTY OF LOS ANGELES**
**REGIONAL PLANNING COMMISSION**
**PROJECT NO. 2020-003127-(2)**
**ADVANCE PLANNING CASE NO. RPPL2020009556**
**GENERAL PLAN AMENDMENT NO. RPPL2021002373**
**ENVIRONMENTAL ASSESSMENT NO. RPPL2020009523**

**WHEREAS**, pursuant to Article 6 of Chapter 3 of Division 1 of Title 7 of the California Government Code ("Government Code") the County of Los Angeles ("County") is authorized to adopt amendments to its General Plan ("General Plan") and elements thereof; and

**WHEREAS**, pursuant to Chapter 22.198 of the Los Angeles County Code ("County Code"), the County is authorized to adopt zone changes; and

**WHEREAS**, pursuant to Article 1 of Chapter 4 of Division 1 of Title 7 of the California Government Code (commencing with Section 65800) and Chapter 22.244 of the County Code, the County is authorized to adopt amendments to Title 22 of the County Code (Planning and Zoning); and

**WHEREAS**, the County Regional Planning Commission ("Commission") has conducted a duly noticed public hearing on January 19, 2022, to consider the following:

1. Project No. 2020-003127 is an amendment to the General Plan and Title 22 of the County Code (Title 22) to establish the Florence-Firestone Transit Oriented District (FFTOD) Specific Plan (Project) for the unincorporated community of Florence-Firestone. Land use and zoning categories for 953.06 acres in Florence-Firestone will be redesignated to encourage more affordable housing opportunities, economic development, pedestrian and other multi-modal access around transit stations and within the community; address industrial/residential incompatibility; and implement the Housing Element;

2. General Plan Amendment No. RPPL2021002373 is a proposed amendment to the General Plan to add the FFTOD Specific Plan into the General Plan and update the Florence-Firestone Community Plan;

3. Advance Planning Case No. RPPL2020009556 is the repeal and replacement of the existing Florence-Firestone Community Standards District (CSD) with Chapter 4 of the FFTOD Specific Plan, which comprises of development standards to encourage active transportation and community serving uses, as well as development standards for scale and massing, building orientation, building architectural elements, circulation, parking, exterior lighting, and private and publicly accessible open space.

**WHEREAS**, the Regional Planning Commission finds as follows:

1. The proposed Specific Plan area covers the unincorporated area of Florence-Firestone. This community is one of the most densely populated unincorporated communities in unincorporated Los Angeles County, with an area of 3.6 square miles and an estimated population of 61,983 (2020 Census). It is surrounded by the City of Los Angeles to the north, south, and west, and shares a boundary with the City of Huntington Park and the City of South Gate, and the unincorporated community of Walnut Park. The community includes three Metro A (formerly Blue) Line light rail stations known as Slauson Station, Florence Station, and Firestone Station;

2. The Project was initiated in 2019 to facilitate more opportunities for affordable housing, transit-oriented development, active transportation, and access to transit in Florence-Firestone, and is partially funded by grants from the State Department of Transportation and the State Department of Housing and Community Development;

3. The Project is informed by a number of background reports on existing conditions and needs assessments on transportation, demographics, land use, characteristics and socioeconomic conditions from an equity lens. The studies identified areas of opportunity, typical commercial activities, and market trends;

4. The proposed FFTOD Specific Plan is an implementation tool of the General Plan, and consistent with and supportive of the goals and policies of the General Plan. The Specific Plan supports policies within the Land Use, Mobility, Air Quality, Noise, Public Services / Facilities, and Economic Development Elements. The Specific Plan is also consistent with and supportive of the goals and policies of the Florence Firestone Community Plan. However, the Project will update themes, policies, and goals in the Community Plan, and includes edits for consistency;

5. The Project will make changes to the General Plan Land Use Policy Map for Florence-Firestone to support more opportunities for affordable housing, encourage transit-oriented development and promote active transportation, improve access to transit, reduce vehicle miles traveled (VMT) by cars, streamline the review of future development projects, and meet the Regional Housing Needs Assessment (RHNA) needs from the Housing Element;

6. The Project proposes to expand the number of properties designated as Mixed-Use in existing commercial corridors and industrial areas, particularly around the Slauson Station. The Project also increases residential densities, particularly around the Slauson Station and the Florence Station. Intensification of density was focused particularly around the Slauson Station area in consideration of the soon to be constructed West Santa Ana Branch Metro Line that will connect Downtown Los Angeles through southeast Los Angeles County at the Slauson Station. As the southern part of the community is more vulnerable to displacement, only minor land

use changes are proposed in areas near the Firestone Station to help facilitate the development of missing middle housing types, such as duplexes and triplexes;

7. The FFTOD Specific Plan will map nine new zones to implement TOD concepts identified in the FFTOD Specific Plan, support increased density consistent with land use changes, and address displacement risk. The nine new zones are MU-1 (Mixed-Use 1), MU-2 (Mixed-Use 2), MU-3 (Mixed-Use 3), MU-T (Mixed-Use Transit), RLM-1 (Residential-Low-Medium 1), RLM-2 (Residential-Low-Medium 2), RM (Residential Medium), and RSS (Residential Slauson Station). The residential zones and mixed-use zones include development standards, such as open space, setbacks, and height restrictions to address community concerns with bulk and design. The rezoning, in part, implements the Housing Element by creating site capacity to meet the County's RHNA goals;

8. Informed by Figure 5-27 of the General Plan, which identifies "Industrial Flex Districts" in Florence-Firestone, the FFTOD Specific Plan maps a new Industrial Mix (IX) zone to provide more flexibility for uses the industrial area along the Slauson corridor. The FFTOD Specific Plan also rezones properties along Wilmington Avenue around the Slauson Station and Florence Station and in the southeast portion of the community, from M-1 and M-2 to IX, to address land use compatibility issues where residences are adjacent to industrial uses;

9. The Project rescinds and replaces the Florence-Firestone CSD with Chapter 4 of the Specific Plan (Florence-Firestone Zones and Development Standards). The regulations contained within Chapter 4 establish the nine new zones and include standards for the following sections: Community-Wide Development Standards, TOD Mixed-Use Zones, TOD Residential Zones, TOD Industrial Mix Zones, Circulation and Parking Standards, and Countywide Zones. It also includes standards to support community-serving commercial uses, and establishes a frontage zone on private property in select areas to increase the width of sidewalks. Together, they work to encourage active transportation, support outdoor dining, and create a welcoming, pedestrian environment. Furthermore, the regulations also address scale and massing, building orientation, building architectural elements, circulation, parking, exterior lighting, and private and publicly accessible open space;

10. In August 2020, staff held a multi-jurisdictional coordination meeting with the cities of Huntington Park, Los Angeles, and Vernon and with Metro to provide a project overview and discuss how best to coordinate planning efforts. In October 2020, staff conducted an online town hall meeting to introduce the Project, and in November 2020, conducted a series of focus group meetings and community partner conversations. In December 2020, staff held an online community mapping activity. Finally, in February 2021, staff held a community orientation webinar, and a follow up partner jurisdiction coordination meeting;

11. To supplement online engagement, hard copies of a TOD Planning Guide with accompanying community feedback worksheets were distributed to the community with the help of County libraries and community partners during February 2021. In all, staff received over 150 worksheet responses from community members. Outreach also included online briefings and surveys to youths in the community, who were able to share feedback as well. In addition, a public scoping meeting for the Environmental Impact Report ("EIR") was held on March 25, 2021 to provide project information and solicit public comments;

12. A Programmatic EIR was prepared in compliance with the California Environmental Quality Act (CEQA) and the County environmental guidelines. The draft Specific Plan and Draft EIR were publicly released on September 21, 2021. In conjunction with the release of the draft documents, newsletters and notices emailed to community stakeholders to share information about the project and a newspaper notice was filed;

13. The Program EIR identified that the Project would result in less than significant impacts to the following areas: Aesthetics, Energy, Geology and Soils, Land Use and Planning, Population and Housing, Public Services, Recreation, and Transportation. The following were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures: Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Tribal Cultural Resources, and Utilities and Service Systems. However, impacts to Air Quality and Cultural Resources were determined to be significant and unavoidable, requiring a Statement of Overriding Considerations;

14. The Project has environmental, economic, and social benefits that outweigh the unavoidable adverse environmental impacts of the short-term impacts on air quality and impacts to cultural resources due to the potential to encounter previously unrecorded or unknown resources during construction of improvements required by the Specific Plan, for by-right development, or activities that are subject to ministerial review or statutorily exempt from CEQA. Implementation of the Project supports attainment of State, regional, and County goals for GHG reduction, reduction of VMT, encouraging housing and economic development opportunities, and addressing industrial and residential incompatibility;

15. Pursuant to the provisions of Sections 22.222.180 of the County Code, a public hearing notice was published in local and regional newspapers, La Opinion and Press Telegram on December 7, 2021. The public hearing notice and materials were posted on the Department's website on December 15, 2021, sent via email, and promoted through social media;

16. On January 19, 2022, the Commission conducted a duly-noticed public hearing (virtually via Zoom). After hearing public comments, the Commission closed the public hearing, and voted unanimously to recommend to the Board of Supervisors certification of the Final EIR and approval of the Project with changes recommended by staff.

**THEREFORE, BE IT RESOLVED THAT** the Regional Planning Commission recommends to the Board of Supervisors of the County of Los Angeles ("Board") as follows:

1. That the Board hold a public hearing to consider adopting the Florence-Firestone Transit Oriented District Specific Plan, Project No. 2020- 003127-(2), which includes Advance Planning Case No. RPPL2020009556 and General Plan Amendment No. RPPL2021002373 to change land use designationsand zoning in the community of Florence-Firestone, add the FFTOD Specific Planto the General Plan, rescind the existing Florence-Firestone Community Standards District and replace it with Chapter 4 of the Specific Plan, and amending portions of the Florence-Firestone Community Plan;

2. That the Board certify the Final Program EIR, Environmental Plan No. RPPL 2020009523, and find that it has been prepared in compliance with CEQA and the State and local agency guidelines related thereto;

3. That the Board determine that where significant adverse environmental effects of the project, as described in the Final Program EIR, have not been reduced to a level of less than significant, the benefits of the Florence-Firestone Transit Oriented District Specific Plan, such as specific social, economic, legal, technological, or other considerations outweigh the environmental effects of the project as stated in the CEQA Findings of Fact and Statement of Overriding Considerations(attached) for the project; and

4. That the Board adopt Project No. 2020-003127 and determine that it is compatible with and supportive of the goals and policies of the General Plan.

I hereby certify that the forgoing resolution was adopted by a majority of the voting members of the Regional Planning Commission of the County of Los Angeles on January 19, 2022.

Elida Luna

Elida Luna, Interim Secretary
County of Los Angeles
Regional Planning Commission

APPROVED AS TO FORM:

By Elaine Lemke

Elaine Lemke, Assistant County Counsel

EXECUTIVE OFFICE
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

PUBLIC NOTICE OF THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

Celia Zavala, Executive Officer-
Clerk of the Board of Supervisors
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012

**NOTICE OF PUBLIC HEARING CONCERNING**

**FLORENCE-FIRESONE TRANSIT ORIENTED DISTRICT (FFTOD) SPECIFIC PLAN**
**aka SLAUSON STATION TOD**

**PROJECT NO. 2020-003127-(2)**
**ADVANCE PLANNING PROJECT NO. RPPL2020009556-(2)**
**GENERAL PLAN AMENDMENT NO. RPPL2021002373-(2)**
**ENVIRONMENTAL ASSESSMENT NO. RPPL2020009523-(2)**
**STATE CLEARINGHOUSE NUMBER 2021030300-(2)**

Notice is hereby given that the Board of Supervisors will conduct a public hearing on the matter referenced above on **Tuesday, March 15, 2022 at 9:30 a.m.**, in Room 381B of the Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012. Interested persons will be given an opportunity to testify. **Please note that due to the COVID-19 pandemic, a virtual public hearing may be held.** Please visit http://bos.lacounty.gov/Board-Meeting/Board-Agendas for details on how to listen to the virtual meeting and/or address the Board. Written comments may be submitted to the address above, attention: Public Hearing Section or e-mailed to PublicHearing@bos.lacounty.gov with the Project No. in the "Subject". Project status can be obtained online at: http://bos.lacounty.gov/Board-Meeting/Public-Hearings or you may also call (213) 974-1426.

**Location:** Unincorporated community of Florence-Firestone

**General Description of Proposal:** The proposed Florence-Firestone Transit Oriented District **(**FFTOD) Specific Plan will implement the County General Plan 2035 (General Plan) TOD Program to create transit-accessible housing development; increase job-generating uses and economic activity; develop a safe and attractive transportation network; increase walking, bicycling, and transit ridership; streamline the environmental review process for future development projects in the community by proposing new zoning categories and standards that would also include setback and parking standards to address mobility issues in the community, primarily within the 0.5-mile TOD area of the three Metro A Line stations, that include development standards and design guidelines appropriate for meeting the planned density and intensity established by the General Plan Land Use Designations; and will also update goals and policies of the Florence-Firestone Community Plan, and zoning categories for sites identified for the Regional Housing Needs Assessment (RHNA) by the Housing Element update (HEU). In addition to establishing new zoning categories, the Project would amend and incorporate the standards of the Florence-Firestone Community Standards District (FFCSD) into the FFTOD Specific Plan. The Board will also consider the certification of the Environmental Impact Report (EIR) which includes the Final EIR and Draft EIR.

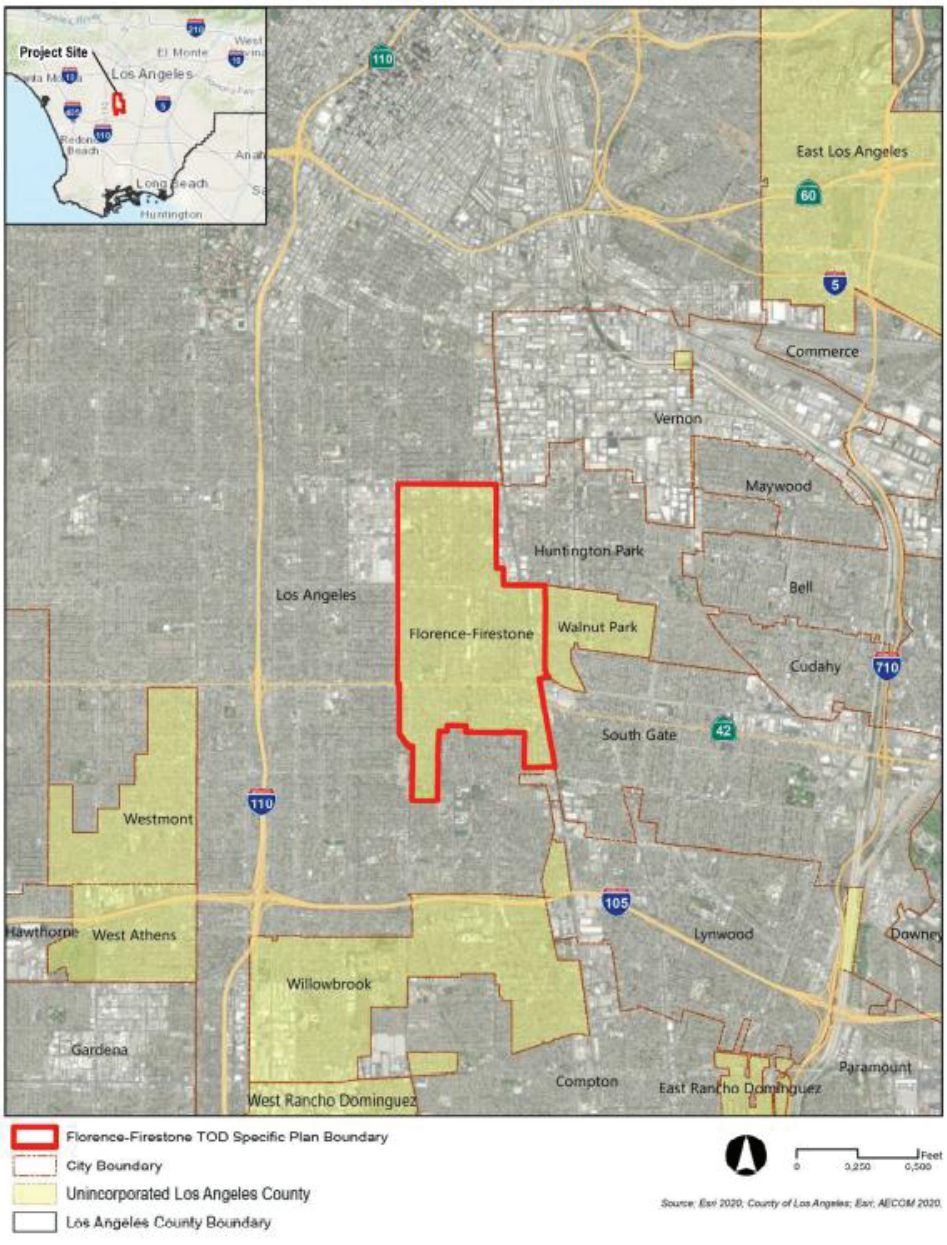
Contact the Department of Regional Planning, **Richard Marshalian at (213) 974-6316** between 7:30 a.m. and 5:30 p.m., Monday through Thursday (office is closed Fridays) or Rmarshalian@planning.lacounty.gov directly for questions or additional information. Selected materials are available at http://planning.lacounty.gov/fftod. **Si necesita más información en Español, por favor llame al (213) 974-6411.**

**PROJECT NO. 2020-003127-(2)**
**ADVANCE PLANNING PROJECT NO. RPPL2020009556-(2)**
**GENERAL PLAN AMENDMENT NO. RPPL2021002373-(2)**
**ENVIRONMENTAL ASSESSMENT NO. RPPL2020009523-(2)**
**STATE CLEARINGHOUSE NUMBER 2021030300-(2)**

If you need reasonable accommodations, such as assistive listening devices, agenda in Braille, interpreters, disability-related accommodations or other auxiliary aids, please contact the Executive Office of the Board at (213) 974-1411 or (213) 974-1707 (TTY), Monday through Friday from 8:00 a.m. to 5:00 p.m., at least three business days prior to the Board meeting. Later requests will be accommodated to the extent feasible. Máquinas de traducción estan disponibles o si necesita intérprete para las juntas del Condado de Los Angeles, por favor llame al (213) 974-1426, de lunes a viernes de 8:00 a.m. a 5:00 p.m., con tres días de anticipación.

CELIA ZAVALA
EXECUTIVE OFFICER OF THE
BOARD OF SUPERVISORS

**PROJECT VICINITY MAP**



# EXHIBIT F

# CEQA FINDINGS OF FACT REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE FLORENCE-FIRESTONE TOD SPECIFIC PLAN

## STATE CLEARINGHOUSE NO. 2021030300

# 1.0 BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA.

# 2.0 PROJECT SUMMARY

## 2.1 PROJECT LOCATION

The proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

## 2.2 PROJECT DESCRIPTION

The FFTOD Specific Plan would establish transit oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as

part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5 mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

## 2.3 PROJECT OBJECTIVES

The project objectives are to:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

The FFTOD Specific Plan objectives were identified by the TOD Program and the Florence-Firestone Community Plan in collaboration with Caltrans.

## 2.4 ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the Los Angeles County (the lead agency for the proposed project) CEQA Guidelines, Los Angeles County conducted an extensive environmental review of the proposed project.

- Los Angeles County issued a Notice of Preparation (NOP) and Initial Study for the proposed project on March 15, 2021. The public review period extended from March 15, 2021 to April 14, 2021.
- Los Angeles County held an online scoping meeting for the proposed project on March 25, 2021 via Zoom.
- Based upon the Initial Study and Environmental Checklist Form, Los Angeles County staff determined that a Draft EIR (Draft EIR) should be prepared for the proposed project. The scope of the Draft EIR was determined based on Los Angeles County's Initial Study, comments received in response to the NOP, and comments received at the scoping meeting conducted by Los Angeles County.
- Los Angeles County prepared a Draft EIR, which was made available for a 45-day public review period beginning September 21, 2021 and ending November 5, 2021.
- Los Angeles County prepared a Final EIR (Final EIR), including the Responses to Comments to the Draft EIR, the Findings of Fact, and the Statement of Overriding Considerations. The Final EIR/Response to Comments contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents.
- Los Angeles County held public hearings on the proposed project, including a Regional Planning Commission hearing on January 19, 2022, and a County Board of Supervisors Hearing on March 15, 2022.

## 2.5 RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by Los Angeles County in conjunction with the proposed project
- The Final EIR
- The Draft EIR
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR
- The Mitigation Monitoring and Reporting Program
- The reports and technical memoranda included or referenced in the Response to Comments
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR
- The Resolutions adopted by Los Angeles County in connection with the proposed project, and all documents incorporated by reference therein
- Matters of common knowledge to Los Angeles County, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

## 2.6 CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for Los Angeles County's actions related to the proposed project are at the Los Angeles County Department of Regional Planning (DRP), 320 West Temple Street, Room 1356, Los Angeles, CA 90012. The DRP is the custodian of the administrative record for the proposed project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the DRP. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

# 3.0 FINDINGS OF FACTS AND OVERRIDING CONSIDERATIONS

Los Angeles County, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the Draft EIR and Final EIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
    1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
    2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
    3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.
(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
(e) Compensating for the impact by replacing or providing substitute resources or environments.

# 4.0 FINDINGS AND FACTS REGARDING IMPACTS

## 4.1 IMPACTS DETERMINED NOT TO BE SIGNIFICANT

### 4.1.1 INITIAL STUDY AND SECTION 5.0, OTHER CEQA CONSIDERATIONS, OF THE DRAFT EIR

The proposed project was found to have either no impact or a less-than-significant impact on the following environmental issue areas, as determined in Section 5.0 Other CEQA Considerations of the Draft EIR and the Initial Study (Appendix A of the Draft EIR). Below is a brief discussion stating the reasons why various possible significant effects of a project were determined not significant and therefore not discussed in detail in Section 3.0 of the Draft EIR.

- **Aesthetics:**
    - *The FFTOD Specific Plan would not have a substantial adverse effect on a scenic vista.* There are no designated scenic highways, significant ridgelines, or other identified scenic resources in the FFTOD Specific Plan Area. As a result, impacts to scenic vistas related to implementation of the FFTOD Specific Plan would be less than significant.
    - *The FFTOD Specific Plan would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail.* According to the Trails Map by the Los Angeles County Department of Parks and Recreation, no Los Angeles County trails are in the FFTOD Specific Plan Area. Therefore, the project would not be visible or obstruct views from a regional trail, and no impact would occur.
    - *The FFTOD Specific Plan would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.* Based on a review of the California Department of Transportation Scenic Highways Program, no state scenic highways are in the FFTOD Specific Plan Area. The closest scenic highway to the FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. Therefore, the FFTOD Specific Plan Area is not visible from this highway, and the project would not result in impacts to scenic resources within view of a state scenic highway. The project would not damage scenic resources and no impact would occur.

- **Agriculture and Forestry:**
    - *The FFTOD Specific Plan would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.* According to the California Important Farmland Finder maintained by the California Department of Conservation, the majority of the FFTOD Specific Plan Area is designated as Urban and Built-Up Land. There is an area of Unique Farmland at the southern boundary of the FFTOD Specific Plan Area west of Compton Avenue and south of 91st Street. The FFTOD Specific Plan would include zone changes for existing residential parcels adjacent to this area of Unique Farmland. However, the FFTOD Specific Plan would not convert the Unique Farmland to a nonagricultural use. Therefore, the impact would be less than significant.
    - *The FFTOD Specific Plan would not conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.* There are no existing Williamson Act contracts in this part of Los Angeles County, and there are no designated agricultural resource areas in the FFTOD Specific Plan Area. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.
    - *The FFTOD Specific Plan would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 [g]), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104[g]).* The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not in an area zoned for forest land, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. Therefore, implementation of the project would not conflict with or cause rezoning of forest land or timberland, and no impact would occur.
    - *The FFTOD Specific Plan would not result in the loss of forest land or conversion of forest land to nonforest use.* The FFTOD Specific Plan Area is not zoned for forest land, nor does it contain any forests. Therefore, implementation of the project would not result in the loss of forest land or conversion of forest land to nonforest use, and no impact would occur.
    - *The FFTOD Specific Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use.* Although the FFTOD Specific Plan includes zone changes for existing residential parcels adjacent to an area of Unique Farmland, it does not propose converting the Unique Farmland to nonagricultural use. In addition, the changes associated with the FFTOD Specific Plan would not be expected to result in future conversion of this farmland to nonagricultural use, because the farmland would remain in the same context of agricultural activities

in an electrical transmission right-of-way that is surrounded by urban development. Therefore, the impact would be less than significant.

- **Biological Resources:**
  - *The FFTOD Specific Plan would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).* The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and lacks natural, vegetated areas (such as creeks or channels) that could support sensitive natural communities or native habitat for sensitive species. The proposed FFTOD Specific Plan provides for infill development in an already highly disturbed urban environment. Any occurrence of a sensitive species in the FFTOD Specific Plan Area is expected to be an incidental occurrence, such as during foraging. It is anticipated that some trees would likely be removed to accommodate construction of development projects, which has the potential to impact nesting birds if future development occurs during the nesting season. By law, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to protect migratory and nesting birds. As such, impacts to nesting birds would be less than significant.
  - *The FFTOD Specific Plan would not have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, nonjurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.* According to the National Wetlands Inventory managed by the USFWS, no riparian habitat or nonjurisdictional wetlands are in the FFTOD Specific Plan Area. In addition, the FFTOD Specific Plan Area lacks natural, vegetated areas that could support sensitive natural communities or native habitat for sensitive species. No impact would occur.
  - *The FFTOD Specific Plan would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.* There are no state or federally protected wetlands in the FFTOD Specific Plan Area, which is heavily urbanized. The closest mapped wetland to the FFTOD Specific Plan Area is Compton Creek, approximately 1.3 miles south of the FFTOD Specific Plan Area. Therefore, the project would have no impact on wetlands.
  - *The FFTOD Specific Plan would not 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.* The FFTOD Specific Plan Area is heavily urbanized and does not present suitable habitat to support the movement of native or migratory fish. Existing trees and vegetation in

the FFTOD Specific Plan Area may be used as habitat by migratory birds. However, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with state and federal regulations that protect migratory wildlife, including the MBTA and California Fish and Game Code. Therefore, impacts would be less than significant.

- *The FFTOD Specific Plan would not convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).* According to the DRP's Distribution of Oak Species in Los Angeles County Map, there is no occurrence of oak woodlands or other unique native woodlands in or near the FFTOD Specific Plan Area, as the area is developed with urban land uses. Therefore, no impact would occur to oak woodlands or native woodlands.
- *The FFTOD Specific Plan would not conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (Los Angeles County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (Los Angeles County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (Los Angeles County Code, Title 22, Ch. 102), Specific Plans (Los Angeles County Code, Title 22, Ch. 22.46), Community Standards Districts (Los Angeles County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (Los Angeles County General Plan, Figure 9.3).* The only applicable local policy or ordinance protecting biological resources for the FFTOD Specific Plan Area is the Los Angeles County Oak Tree Ordinance (County Code of Ordinances Sections 22.56.2050 et seq.), which prohibits anyone from damaging or removing oak trees without a permit from DRP. Although no occurrence of oak woodlands or other unique native woodlands occur in or near the FFTOD Specific Plan Area, existing landscaping in the FFTOD Specific Plan Area may include oak trees. However, future proposed development under the FFTOD Specific Plan would be required to adhere to the Oak Tree Ordinance, which requires permit applicants to submit a site plan and an oak tree report. As a result, the project would not conflict with any local plans or policies protecting biological resources, and impacts would be less than significant.
- *The FFTOD Specific Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan.* According to the Habitat Conservation Database managed by the USFWS, the FFTOD Specific Plan Area is not in any adopted Habitat Conservation Plan area. In addition, based on the California Natural Community Conservation Plans Map created by CDFW, the FFTOD Specific Plan Area is not in any Natural Community Conservation Plan area. No impact would occur.

- **Geology and Soils:**
    - *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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 active fault trace.* The California Earthquake Hazards Zone Application Map issued by the California Geological Survey shows no active faults or Alquist Priolo Earthquake Fault Zones in the FFTOD Specific Plan Area. The closest known fault is the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area. Due to the distance between the FFTOD Specific Plan Area and the nearest active fault, future development pursuant to implementation of the FFTOD Specific Plan is unlikely to experience ground rupture. The impact would be less than significant.
    - *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.* Future development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the provisions of the California Building Code, which are imposed on development projects by Los Angeles County during the building plan check and development review process. Compliance with the requirements of the California Building Code would ensure that impacts related to the hazards associated with strong seismic ground shaking would be less than significant.
    - *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.* The FFTOD Specific Plan Area has a flat topography. In addition, according to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is not in or near a landslide zone. Therefore, no impact would occur.
    - *The FFTOD Specific Plan would not have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater.* The FFTOD Specific Plan Area is served by a public sanitary sewer system. Future developments pursuant to implementation of the FFTOD Specific Plan would include connections to sanitary sewers and would not use on site wastewater treatment systems. No impact would occur.
    - *The FFTOD Specific Plan would not Conflict with the Hillside Management Area Ordinance (Los Angeles County Code, Title 22, Ch.22.104).* The FFTOD Specific Plan Area has a flat topography and is not subject to the Hillside Management Area Ordinance.
- **Hazards and Hazardous Materials:**
    - *The FFTOD Specific Plan would not be in 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. The project would not result in a safety hazard or excessive noise for people residing or*

*working in the project area.* According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or within 2 miles of a public or public use airport. The nearest public use airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the area and no impact would occur.

- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in a high fire hazard area with inadequate access.* According to the Fire Hazard Severity Zones Map prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the FFTOD Specific Plan Area is not in or near a Very High Fire Hazard Severity Zone. Therefore, there would be no impact to people or structures in a high fire hazard area with inadequate access.
- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in an area with inadequate water and pressure to meet fire flow standards.* The FFTOD Specific Plan Area is not in a Very High Fire Hazard Severity Zone. Furthermore, the Florence-Firestone community is served by Fire Station 16 at 8010 Compton Avenue. The Los Angeles County Fire Department requires adequate water and pressure to service an area, and adequate water and pressure to meet fire flow standards would be continued with buildout of the FFTOD Specific Plan. Therefore, the impact would be less than significant.
- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the Project is not in proximity to land uses that have the potential for dangerous fire hazard.* The FFTOD Specific Plan Area is presently heavily urbanized with industrial and commercial land uses that inherently have some fire hazard potential. However, these existing uses primarily consist of retail store, shopping center, and auto service commercial uses with nearby residential uses that are typical of an urban setting and would not be considered a dangerous fire hazard. Additionally, the proposed FFTOD Specific Plan zones would consider uses suitable for employment near residential areas as well as the creation of transitions between industrial uses that would serve to limit exposure of people to certain land uses. Therefore, a less than significant impact would occur to people or structures in proximity to land uses that have the potential for fire hazard.
- *The FFTOD would not propose a use that would constitute a potentially dangerous fire hazard.* The FFTOD Specific Plan would address land use and zoning changes and provide recommendations for mobility improvements that support housing density and employment in proximity to the LA Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. It would include light industrial and commercial

land uses that may use or manufacture products/materials that could present some fire hazard. However, the FFTOD Specific Plan Area is already heavily urbanized with industrial and commercial land uses that also inherently have some fire hazard potential. The majority of the existing industrial uses in the FFTOD Specific Plan Area are light manufacturing, with a small amount of heavy manufacturing, with industrial uses primarily clustered along industrial corridors with auto related uses. The proposed Industrial Flex zone would maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for employment near residential areas. The Mixed-Use Zoning Categories (MU-1, MU-2, MU-3, and MU-T) would create an employment-focused, high-intensity mixed-use transit district that allows for the creation of transitions between industrial uses. The Industrial Flex zone would allow for the creation of transitions between employment uses and residential to encourage less noxious uses and focus on light industrial, neighborhood-serving commercial and office uses. Therefore, future development in these zones would not constitute a potentially dangerous fire hazard or increase the potential for dangerous fire hazards as they would consist of typical urban land uses, similar to existing conditions. The impact would be less than significant.

- **Hydrology and Water Quality:**
  - *The FFTOD Specific Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows which would expose existing housing or other insurable structures in a federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding.* The Federal Emergency Management Agency (FEMA) Flood Map Service Center, managed by the Department of Homeland Security, indicates that the FFTOD Specific Plan Area is in an area of minimal flood hazard. In addition, DRP's GIS-NET Public Map shows no streams or rivers in the FFTOD Specific Plan Area. Therefore, future development pursuant to implementation of the FFTOD Specific Plan would not impede or redirect flood flows and would not expose existing housing to flood hazards. The impact would be less than significant.
  - *The FFTOD Specific Plan would not otherwise place structures in federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.* The FFTOD Specific Plan Area is designated as an area of minimal flood hazard. Future development pursuant to implementation of the FFTOD Specific Plan would not place structures in the federal 100-year flood hazard or Los Angeles County Capital floodplain areas. The impact would be less than significant.

- *The FFTOD Specific Plan would not conflict with the Los Angeles County Low Impact Development Ordinance (Los Angeles County Code, Title 12, Ch. 12.84).* All designated, nondesignated, street and road construction, and single-family hillside home projects in the Unincorporated Areas of Los Angeles County, including in the Florence-Firestone community, are required to comply with the Low Impact Development (LID) Standards Manual. A comprehensive LID plan and analysis demonstrating compliance with the LID Standards Manual must be submitted for review and approval by the Director of Public Works. Future redevelopment and infill development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the ordinance as applicable. No impact would occur.
- *The FFTOD Specific Plan would not use on-site wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).* The FFTOD Specific Plan Area is served by existing public sanitary sewers. No wastewater treatment systems are proposed in the FFTOD Specific Plan Area. Additionally, the FFTOD Specific Plan Area does not contain geological limitations or surface water such as rivers and lakes. Therefore, no impact related to use of wastewater treatment systems in these areas would occur.
- *The FFTOD Specific Plan would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.* The FFTOD Specific Plan Area is designated as an area of minimal flood hazard. The Los Angeles County Tsunami Inundation Maps created by the California Department of Conservation show that the FFTOD Specific Plan Area is not in a tsunami inundation zone. In addition, the Dam Locations Map created by the Los Angeles County Public Works show no dams or reservoirs in or near the area, indicating that the FFTOD Specific Plan Area is not in a seiche zone. Because the FFTOD Specific Plan Area is not in any of the aforementioned zones, no impact related to the risk of release of pollutants due to inundation would occur.

- **Land Use and Planning:**
  - *The FFTOD Specific Plan would not physically divide an established community.* Implementation of the FFTOD Specific Plan would include land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the LA Metro A Line Station area (i.e., Slauson, Florence, and Firestone Stations). These improvements would make it easier for bicyclists and pedestrians to access these stations and enhance commercial development focused on serving the local community. Redevelopment and infill development of parcels in the FFTOD Specific Plan Area would result in additional housing units and promote multi-modal connectivity and increase access to transit within the community. Therefore, implementation of the project would not physically divide an established community. A less than significant impact would occur.

- *The FFTOD Specific Plan would not conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas.* DRP defines Hillside Management Areas (HMAs) as areas with 25 percent or greater natural slopes, and Significant Ecological Areas (SEAs) as areas with irreplaceable biological resources. According to DRP's GIS-NET Public database, no HMAs or SEAs are in or near the FFTOD Specific Plan Area. Therefore, the project would not conflict with the goals and policies of the General Plan related to HMAs or SEAs and no impact would occur.

- **Mineral Resources:**
  - *The FFTOD Specific Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.* According to the Generalized Mineral Land Classification Map of Los Angeles County – South Half issued by the California Geological Survey, the majority of the FFTOD Specific Plan Area is designated as Mineral Resource Zone (MRZ) 1, which indicates that no significant mineral deposits are present, or that there is little likelihood for their presence. The northern portion of the FFTOD Specific Plan Area, from Slauson Avenue until approximately E 62nd Street, is designated MRZ-2, which indicates that the area contains significant mineral deposits or high likelihood exists for their presence. However, that portion of the FFTOD Specific Plan Area is currently heavily urbanized with residential and industrial uses. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that are incompatible with mining. In addition, no active mines are in or near the FFTOD Specific Plan Area. Therefore, a less than significant impact would occur related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
  - *The FFTOD Specific Plan would not 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 General Plan does not specify areas of significant availability of a locally important mineral resource recovery site in the FFTOD Specific Plan Area. The FFCP also does not specify such mineral resource recovery areas. Although a portion of the FFTOD Specific Plan Area is designated as MRZ-2 the land is already built out with urban land uses incompatible with mining. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that would also be incompatible with mining. Therefore, the project would not result in the substantial 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 impact would be less than significant.

- **Noise:**
  - *The FFTOD Specific Plan would not be in the vicinity of a private airstrip or 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. The project would not expose people residing or working in the project area to excessive noise levels.* According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or a private airstrip, or within 2 miles of a public airport or public use airport. The closest airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. The project would not expose people residing or working in the FFTOD Specific Plan Area to excessive noise levels from aircraft. No impact would occur.

- **Recreation**:
  - *The FFTOD Specific Plan would not interfere with regional trail connectivity.* According to the Los Angeles County Department of Parks and Recreation's Trails Map, there are no Los Angeles County trails in the FFTOD Specific Plan Area. The project would not interfere with regional open space connectivity, and no impacts would occur.
- **Wildfire:**
  - *The FFTOD Specific Plan would not be located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project would not substantially impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors; 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; 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; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.* According to the California Fire Hazard Severity Zone Map prepared by CAL FIRE, the FFTOD Specific Plan Area is not within or near a Very High Fire Hazard Severity Zone within a Local Responsibility Area or a State Responsibility Area. Therefore, no impacts related to high fire hazard severity zones would occur.

## 4.1.2 SECTION 3.0 OF THE DRAFT EIR

This section identifies impacts of the project determined in the Draft EIR to be less than significant without implementation of programmatic mitigation measures.

### 1. Aesthetics

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no

changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact AES-1:** *The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality.*

Implementation of the FFTOD Specific Plan would establish transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian friendly and community serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three LA Metro A (Blue) Line Stations in the community (Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit oriented development pattern.

The FFTOD Specific Plan includes Guiding Principles and Concepts for each station and that serve as the approach to land use, urban design building standards, and mobility improvements. Zone regulations intended to guide development and decision making to achieve the vision and guiding principles of the FFTOD Specific Plan provide a detailed list of allowed land uses, permit requirements, and objective development standards for each zone in the FFTOD Specific Plan Area. Urban design standards of the FFTOD Specific Plan would provide a comprehensive approach to high quality design for the physical design of the FFTOD Specific Plan Area and would serve to upgrade and improve the aesthetic appearance of existing buildings, open space areas, and other site improvements through architectural and landscape improvements to enhance the overall visual character of the FFTOD Specific Plan Area.

The FFTOD Specific Plan also includes recommended strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The FFTOD Specific Plan would implement the Los Angeles County Transit Oriented District Toolkit (2019) and proposes to enhance the “frontage zone” portion of sidewalks in specific locations. In addition, major improvements have been identified to improve access to the LA Metro A Line Stations in the FFTOD Specific Plan Area with a focus on pedestrian accessibility.

Overall, development in accordance with the FFTOD Specific Plan would not degrade the existing visual character of the highly urbanized Florence-Firestone community. Redevelopment of existing and/or new buildings would be designed based on the FFTOD Specific Plan's urban design guidelines and include architectural and landscaping details that complement and enhance the overall quality of the community. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP. Impacts would be less than significant.

- **Impact AES-2:** *The project would not create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area.*

The FFTOD Specific Plan Area is a highly urbanized environment, and there are a number of existing sources of nighttime illumination. Buildout of the FFTOD Specific Plan would alter and intensify land uses and their related lighting sources throughout the FFTOD Specific Plan Area by introducing new building (interior and exterior), security, sign, street, parking lights. In addition to new mobility and transit amenities (lighted shelters, wayfinding signage) and lighting to increase the accessibility, safety, and convenience of multimodal travel, the project would introduce sources of aesthetic lighting and glare in the form of glazing and building materials.

The FFTOD Specific Plan includes development standards related to lighting and building materials that would reduce light and glare impacts generated by the project. In general, all outdoor lighting systems, including architectural lighting, shall not aim directly at the open sky, off site, or onto adjacent uses. Blinking, flashing, and oscillating lights are prohibited, and warm white lights shall be used where possible. Colored lights shall be avoided and only be used if they are part of a comprehensive architectural lighting theme of commercial areas or establishments. All parking structures must screen night lighting to avoid uplighting, spillover, and glare on nearby properties. Future development projects shall be required to comply with the specific development standards for lighting of their respective zones. Generally, all lighting and lighting fixtures shall be designed to complement buildings, be of an appropriate scale, avoid creating glare, and provide adequate light over walkways and parking areas to foster pedestrian safety.

Overall, development in accordance with the FFTOD Specific Plan would introduce new sources of light and glare. However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with the FFTOD Specific Plan would be typical of the surrounding area and what is expected for an urban, transit-oriented

community. Adherence to the FFTOD Specific Plan standards, Los Angeles County Code, and California Building Energy Efficiency Standards would reduce project-generated lighting and glare impacts to less-than-significant levels.

## 2. Air Quality

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact AQ-4:** *The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

Future development under the FFTOD Specific Plan is assumed to include mixed-use, residential, retail, commercial service, and industrial uses. New industrial uses would be required to be in compliance with South Coast Air Quality Management District (SCAQMD) Rule 402, Nuisance. Likewise, existing facilities are required to be in compliance with SCAQMD Rule 402 to prevent nuisances on sensitive land uses. In addition, the FFTOD Specific Plan includes land use regulations and development standards for TOD zones, which for mixed use communities for example, denote that operations shall not create objectionable and/or obnoxious dust, light, matter, mud, noise, odor, refuse, smoke, steam, vibration, maintenance needs of grounds or buildings, or other nuisance(s). Therefore, impacts related to other emissions, such as those leading to odors, would be less than significant.

## 3. Cultural Resources

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact CUL-4:** *The project would not disturb any human remains, including those interred outside of formal cemeteries.*

The FFTOD Specific Plan Area is developed and has previously been subjected to substantial ground disturbance, which likely already resulted in the discovery of subsurface materials such as human remains. Nevertheless, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. California Health and Safety Code Sections 7050.5, 7051, and 7054 requires that if human remains are discovered, disturbance of the site halt and remain halted until the coroner has investigated and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to their authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the Native American Heritage Commission by phone within 24 hours pursuant to Section 5097 of the California PRC. Therefore, compliance with these regulations would ensure impacts to discovery of human remains are less than significant.

## 4. Energy

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact ENE-1:** *The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.*

Energy-requiring activities range from equipment operation during construction, to building operations, to transportation during all phases of the FFTOD Specific Plan implementation; Fuel, electricity, and natural gas consumption associated with these activities was estimated and presented within Tables 3.4-1 through 3.4-5 of the Draft EIR. Fuel consumed during construction would be temporary in nature and would not represent a significant demand on available fuel, beyond normal construction fuel usage. There are no known project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable

construction sites in Los Angeles County. Operational transportation would be the greatest energy consuming factor associated with implementation of the FFTOD Specific Plan. The FFTOD Specific Plan provides for employment-generating land uses as well as a range of housing options and implements land use and transportation planning strategies that would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands. Building operations would account for approximately 26 percent of the energy consumption for the FFTOD Specific Plan Area. Compliance with existing regulations, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities would be more energy efficient than existing, average, similar-use buildings, as energy efficiency requirements have become more stringent over time. Considering this information, the FFTOD Specific Plan would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy and this impact is considered less than significant.

- **Impact ENE-2:** *The project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.*

Implementation of the FFTOD Specific Plan would result in the development of new land uses that would induce new demand for electricity and natural gas, as well as induce additional vehicle miles traveled that would result in the consumption of fossil fuels. However, design and construction of buildings would comply with the most recently adopted California Building Energy Efficiency Standards Code and California Green Building Standards Code (CALGreen), and the Los Angeles County CAP and OurCounty Sustainability Plan. This would ensure that future development would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance roofs and walls, and high efficacy lighting. Therefore, implementation of the FFTOD Specific Plan would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. This impact is less than significant.

## 5. Geology and Soils

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact GEO-1:** *The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: seismic-related ground failure, including liquefaction.*

Because Southern California is a seismically active area that can produce a high acceleration of seismic shaking, there is potential for exposure of people or structures to liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area. However, conforming to the CBC and Los Angeles County Building Code would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. Therefore, future implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading.

- **Impact GEO-2:** *The project would not result in substantial soil erosion or the loss of topsoil.*

Although the FFTOD Specific Plan Area is in a developed urban area, future construction activities may include excavation, grading, and other soil-disturbing activities that could result in soil erosion or loss of topsoil during rain or high-wind events. However, for projects disturbing more than 1 acre of ground surface, the Construction General Permit requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would include erosion control and sediment control best management practices (BMPs) such as sandbags and covering soil stockpiles, which would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Compliance with the Construction General Permit and BMPs identified in the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit requirements would ensure less-than-significant impacts related to erosion and topsoil during construction of specific developments in the FFTOD Specific Plan Area. Additionally, as part of compliance with the LID Standards, any specific future development project under the FFTOD Specific Plan qualifying as a new development or a redevelopment project would be designed to reduce off-site runoff, promote rainwater harvesting, and reduce erosion and hydrologic impacts downstream. The presence of vegetation on landscaped areas would also reduce the ability of soil to be eroded and lost by wind erosion. Impacts related to erosion and topsoil loss during operation of proposed development would be less than significant.

- **Impact GEO-3:** *The project would not be situated on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*

Development in accordance with the FFTOD Specific Plan requires conformance with the California Building Code (CBC) and Los Angeles County Building Code that would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. Therefore, the implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to liquefaction and liquefaction-induced lateral spreading.

Adherence to CBC and Los Angeles County Building Code requirements would include the preparation of a geotechnical investigation by a state licensed geotechnical engineer. The most effective, feasible, and economical site preparation measures recommended in the report would be incorporated into the site design in accordance with the building requirements. Therefore, the potential for unstable soils to adversely affect proposed structures and improvements resulting in settlement, subsidence, or collapse would be less than significant.

- **Impact GEO-4:** *The project would not create substantial or indirect risks to life or property related to expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994).*

Highly expansive soils swell when they absorb water and shrink as they dry and can damage building foundations and roads. Most of the soils on the project site are loamy fine sand, and thus could be expansive. However, future development projects (new development or redevelopment) pursuant to the FFTOD Specific Plan would be required to comply with applicable ordinances set forth by CBC and Los Angeles County and the most recent building and seismic codes in effect at the time of project design. Compliance with the CBC and Los Angeles County Building Code would ensure that FFTOD Specific Plan implementation would not substantially increase hazards from expansive soils.

## 6. Greenhouse Gases

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact GHG-2:** *The project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.*

The FFTOD Specific Plan would not conflict with applicable plans adopted for the purpose of reducing greenhouse gas (GHG) emissions, which include California Air Resource Board (CARB)'s Scoping Plan, Southern California Association of Governments (SCAG)'s 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) also known as Connect SoCal, and the Los Angeles County Community Climate Action Plan (CCAP).

The FFTOD Specific Plan and its objectives would directly support the goals of Assembly Bill (AB) 32 and Senate Bill (SB) 32 targeted by the CARB Scoping Plan. For example, the State's 2017 Scoping Plan update includes vehicle miles traveled (VMT) reduction goals that call for promotion of land use and community design that reduce VMT, transit-oriented development, and complete street design policies that prioritize transit, biking, and walking. As discussed in Section 3.14 Transportation of the Draft EIR, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. In addition, the FFTOD Specific Plan would comply with the most current Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) requirements. The CALGreen requirements include mandatory measures for all new building construction, which would result in energy conservation, and make a major contribution in meeting the State's goals established by AB 32 and SB 32 for reduction in GHG emissions. Further, future buildings constructed over the lifetime of the project would be subject to the future triannual updates to the Building and Energy Efficiency Standards, which will ultimately require zero net energy construction.

The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce vehicles miles traveled by cars, and streamline the environmental

review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. The FFTOD Specific Plan includes strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The recommended mobility infrastructure improvements identified support transit, pedestrian, and bicycle mobility, and improve parking conditions. Additionally, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. As such, the FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population, which is consistent with regional goals to reduce passenger VMT.

A consistency analysis with the FFTOD Specific Plan to the applicable measures in the Los Angeles County CCAP is provided in Table 3.6-7 Consistency with the Unincorporated Los Angeles County CCAP of the Draft EIR. As identified in the table, the FFTOD Specific Plan would be consistent with the measures in the CCAP.

Therefore, the FFTOD Specific Plan would not obstruct implementation of the CARB Scoping Plan, would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS, and would not conflict with the CCAP. Impacts are considered less than significant.

## 7. Hazards and Hazardous Materials

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact HAZ-1:** *The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*

Demolition and construction activities would require transport, use, and disposal of hazardous materials. Operation of the FFTOD Specific Plan would include new or different land use designations that may involve the routine use of substances classified as hazardous materials including fuels, pesticides, paints, and other materials. Upon compliance with federal, state, and Los Angeles County regulatory requirements (e.g.,

U.S. Department of Transportation [DOT], California Division of Occupational Safety and Health [Cal/OSHA], and Los Angeles County Fire Department [LACoFD]), construction and operation activities of future development projects related to implementation of the FFTOD Specific Plan would not pose substantial hazards to the public or the environment, and impacts would be less than significant.

- **Impact HAZ-3:** *The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.*

FFTOD Specific Plan buildout would result in usage and storage of hazardous materials on site and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions. Project operation could emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur; impacts would be less than significant.

- **Impact HAZ-5:** *The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*

It is possible that during the construction phase of future transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access. Compliance with any requirements, such as a traffic management plan, deemed necessary for approval of the Los Angeles County Public Works Traffic and Lighting Division, would ensure impacts to emergency access would be less than significant.

## 8. Hydrology and Water Quality

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact HWQ-1:** *The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.*

Because each future development project pursuant to implementation of the FFTOD Specific Plan would be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements, BMPs would be in place to prevent potentially harmful materials from being accidentally spilled or improperly disposed of during construction activities. Future development projects disturbing more than 1 acre of ground surface would be required to develop a SWPPP as part of compliance with the Construction General Permit that implements BMPs designed to prevent water quality degradation. Projects disturbing less than 1 acre of ground surface during construction would not be required to prepare a SWPPP but would be required to implement the minimum BMPs required by the Los Angeles County MS4 permit, thereby protecting water quality. As a result, construction impacts related to water quality standards or waste discharge requirements from implementation of the FFTOD Specific Plan would be less than significant.

Future development in the FFTOD Specific Plan Area would include residential, mixed use, commercial, and industrial uses; pollutants associated with these land uses typically include sediments, trash, petroleum products, metals, and chemicals. Compliance with regulations and implementation of LID practices per Los Angeles Regional Water Quality Control Board (LARWQCB) requirements and Los Angeles County Public Works Green Infrastructure Guidelines would minimize pollutants being transported off site into downstream receiving waters, and projects implemented in accordance with the FFTOD Specific Plan would not violate water quality standards or waste discharge requirements.

The FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. Impacts would be less than significant.

- **Impact HWQ-2:** *The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.*

Implementation of the FFTOD Specific Plan would include infill and redevelopment that would result in population growth; thereby increasing demand on water supplies.

Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies that will serve the proposed FFTOD Specific Plan to substantially impact the groundwater aquifer. Buildout of the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system because of the area's developed condition, and because future development projects would be required to incorporate LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines. Based on the depths to groundwater in the FFTOD Specific Plan, excavation for development would not come into contact with groundwater or require dewatering during excavation activities to an extent that groundwater levels would be adversely affected. Furthermore, because groundwater is not present close to the ground surface, stormwater infiltration BMPs (as described in the County LID Standards Manual) would be technically feasible on site, the use of which could increase the amount of groundwater recharge in the FFTOD Specific Plan Area compared to existing conditions. Therefore, implementation of the FFTOD Specific Plan would result in less-than-significant impacts on the Central Groundwater Basin from groundwater use and would result in less-than-significant impacts to the existing recharge capabilities of the area overlying the Central Groundwater Basin.

- **Impact HWQ-3:** *The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off site.*

With implementation of erosion and sediment control BMPs, construction activities associated with future development projects pursuant to implementation of the FFTOD Specific Plan would result in less-than-significant erosion and siltation impacts. Because future development projects would be required to implement the County LID Standards Manual and Green Infrastructure Guidelines, implementation of development within the FFTOD Specific Plan Area would result in a less-than-significant erosion and siltation impact during operations.

- **Impact HWQ-4:** *The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site.*

The majority of the FFTOD Specific Plan Area is built out with urban land uses. Each future development project pursuant to implementation of the FFTOD Specific Plan would be required to have site-specific hydrology and hydraulic studies to determine capacity of the existing storm drain systems and project-specific impacts on such systems prior to approval by the Los Angeles County Public Works. As such, buildout of the FFTOD Specific Plan would not cause a substantial increase in stormwater runoff and would not result in flooding on- or off site with compliance of the Los Angeles County MS4 permit and site-specific allowable discharge rates. Impacts would be less than significant.

- **Impact HWQ-6:** *The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

Construction activities associated with the FFTOD Specific Plan would be required to comply with the NPDES permit that would include typical BMPs for erosion control, sediment control, and waste management. Operational activities associated with future development projects of the FFTOD Specific Plan would be required to meet MS4 permit requirements through compliance with the County LID Standards Manual. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for water agencies serving the FFTOD Specific Plan Area to substantially impact the groundwater aquifer. Therefore, implementation of the FFTOD Specific Plan would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

## 9. Land Use and Planning

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact LUP-1:** *The project would not 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.*

The FFTOD Specific Plan was developed in compliance with requirements of Government Code Sections 65450-65457 and outlines the regulatory, design, implementation, financing, and infrastructure framework to leverage transit investments in the Florence-Firestone Community. Per California State law, Specific Plans must be internally consistent with the jurisdiction's General Plan. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan; broader TOD and sustainability goals of Los Angeles County; and the FFCP. The FFTOD Specific Plan would also be consistent with and would not conflict with SCAG's regional planning goals and policies (i.e., the 2020-2045 RTP/SCS [Connect SoCal]). Therefore, implementation of the proposed project would not result in significant land use impacts.

## 10. Population and Housing

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact POP-1:** *The project would not 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).*

The population, housing, and employment projections with buildout of the FFTOD Specific Plan are greater than current projections identified by SCAG. This increase in population, housing, and employment projections is considered substantial. However, the FFTOD Specific Plan is consistent with SCAG's Connect SoCal goals for focusing higher-density development in transit-rich areas. The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMT, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. Furthermore, the

determination of whether the proposed growth represents a significant impact is whether the project would induce additional growth that would result in significant impacts to the environment.

The determination of whether the FFTOD Specific Plan would induce growth in the vicinity of the FFTOD Specific Plan Area or within Los Angeles County is based on whether the increase in population and housing in the FFTOD Specific Plan Area would increase the need for additional commercial or public services beyond the existing commercial or public services and the commercial services that would result as part of the project. In addition, a determination of inducement of growth is whether the increase in job growth in the FFTOD Specific Plan Area would increase the need for additional housing beyond the existing housing and the housing proposed as part of the project.

The exceedance of population and housing projection over an approximate 15-year period in the region is considered nominal because the growth within the FFTOD Specific Plan would represent 3 percent of Los Angeles County's incremental population growth and 3 percent of Los Angeles County's incremental residential growth. Furthermore, the FFTOD Specific Plan focuses on infill development within walking distance of the Metro A Line Slauson, Florence, and Firestone stations in an area that is presently completely built out, as described in Section 3.14 Transportation of the Draft EIR. The FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population. Therefore, the FFTOD Specific Plan would not induce substantial additional population and housing growth that would result in significant impacts to the environment.

The increase in jobs in the FFTOD Specific Plan Area represents 0.5 percent of the projected job growth in Los Angeles County for 2035. Furthermore, based on an average unemployment rate of 7.1 percent for Florence-Firestone and 5 percent for Los Angeles County (2016), it is reasonable to assume that there will be people living in Los Angeles County and the region available to fill the increase in jobs created in the FFTOD Specific Plan Area without a substantial amount of migration into the region that would require new housing beyond the available housing in the FFTOD Specific Plan Area, Los Angeles County, or region. Therefore, the increase in jobs would not induce additional growth that would result in significant impacts to the environment.

The FFTOD Specific Plan would not induce substantial unplanned population growth in an area, directly or indirectly. Impacts would be less than significant. Impacts would be less than significant.

- **Impact POP-2:** *The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.*

Buildout of the FFTOD Specific Plan would provide a net increase of 12,110 new residential dwelling units over existing conditions in the FFTOD Specific Plan Area. Future development projects pursuant to implementation of the FFTOD Specific Plan may result in temporary displacement of residents during construction activities. However, future development projects would occur sporadically at a parcel by parcel project level, the potential displacement of persons residing in an infill or redevelopment parcel would be short-term, and the project would result in a greater number of residential units to house residents of the area, including those that may be temporarily displaced. Therefore, impacts related to displacement of housing or people would be less than significant.

## 11. Public Services

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact PUB-1:** *The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.*

Buildout of the FFTOD Specific Plan would result in a net increase of approximately 42,518 additional people associated with approximately 12,110 net new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area. The increase in fire department staffing and equipment required to serve the buildout of the proposed Specific Plan would be accommodated by the existing fire stations, and new or physically altered fire protection facilities would not be required to serve the buildout of the Specific Plan. The Los Angeles Sheriff's

Department (LASD) calculates that buildout of the FFTOD Specific Plan would require approximately 42 additional deputies to serve the FFTOD Specific Plan Area. As future development occurs, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury, a portion of which would be allocated to the LASD to ensure adequate staffing and equipment are provided to adequately serve project-related increases in service-call demands.

Additionally, individual projects would require incorporation of fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code). These project design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits for each development project in the Specific Plan. Likewise, individual projects would also be reviewed by County and Sheriff Department staff prior to the developer's receipt of permits to ensure that appropriate security measures are included in each development (i.e., the general principles of Crime Prevention Through Environmental Design [CPTED]) and would be required to pay all applicable required law enforcement mitigation fees associated with the project. Impacts would be less than significant.

- **Impact PUB-2:** *The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered school, library, or other public facilities in order to maintain acceptable service ratios or other performance objectives.*

Buildout of the FFTOS Specific Plan is calculated to generate approximately 5,570 total students, consisting of 2,664 elementary school students, 1,211 middle school students, and 1,695 high school students. Projects developed under the Specific Plan would pay SB 50 school impact fees to the Los Angeles Unified School District (LAUSD). For every new residential development in the Specific Plan Area, developer fees would be collected and contributed towards LAUSD's funds to construct new or expand existing school facilities. Such fees are defined as full and complete mitigation for the impact of development projects on school facilities. Furthermore, school capacity and impact fee payment pursuant to implementation of the FFTOD Specific Plan would be assessed on a project-by-project basis. Impacts would be less than significant.

Buildout of the FFTOD Specific Plan is calculated to create a need for an additional 21,259 square feet of facility space, 116,925 collection items, and 43 public access computers. To minimize the impact of residential projects on library services, Los

Angeles County Library collects a one-time Library Facilities Mitigation Fee from developers at the time building permits are requested for all new residential dwellings located within the unincorporated areas of Los Angeles County served by Los Angeles County Library. The FFTOD Specific Plan is located in the Library's Planning Area 5-Southeast which requires $970 per dwelling unit. A calculated total of $11,746,700 of developer fees would be collected for development projects under the FFTOD Specific Plan based on 12,110 additional residential units. Use of such fees by Los Angeles County Library for construction of new and/or expanded library facilities would reduce project impacts on library facilities in the FFTOD Specific Plan Area. Impacts would be less than significant.

## 12. Recreation

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact REC-1:** *The project would not 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.*

Developers of residential units in the FFTOD Specific Plan Area would be required to provide the appropriate amount of parkland based on the proposed development size and allow public access to the parkland, or pay in-lieu fees that would go toward funding Los Angeles County acquisition of local park land or rehabilitation of existing recreational facilities. The FFTOD Specific Plan would also require developers provide publicly accessible open space based on the unit size or gross square feet depending on the development type.

As allowed by the Quimby Act and pursuant to the County Municipal Code, new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable Los Angeles County to maintain a ratio of three acres of local parkland for every 1,000 residents (Section 21.24.340). This provision ensures that when new residential subdivisions are developed, there is an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific

Plan and Los Angeles County Title 22. Therefore, the impact would be less than significant.

- **Impact REC-2:** *The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

It is likely that future developers of residential subdivisions in accordance with the FFTOD Specific Plan would pay in-lieu fees rather than provide new parkland to meet the Los Angeles County's local parkland standard, given the built-out nature of the FFTOD Specific Plan Area. In addition, there is no specific zone pertaining to park or open space use under the FFTOD Specific Plan. The FFTOD Specific Plan buildout would include pedestrian and bicycle infrastructure for mobility improvements. Pedestrian and bicycle infrastructure would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under the FFTOD Specific Plan. The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, the impact would be less than significant.

- **Impact REC-3:** *The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.*

Any new residential projects developed under the FFTOD Specific Plan would be required to fulfill parkland obligations to provide local park space and/or pay park facilities mitigation fees to Los Angeles County. Use of such fees for construction of new and/or expanded park facilities would reduce project impacts on park facilities. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific Plan. Therefore, the impact would be less than significant.

## 13. Transportation

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially

lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact TRA-1:** *The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.*

The FFTOD Specific Plan would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, including public transit, roadway, bicycle, or pedestrian facilities. Consistency analysis of the FFTOD Specific Plan with key guiding policy documents (i.e., Connect SoCal, the FFCP, the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County), which set the long-term direction of land use development and transportation in the region and for the Florence-Firestone community, is provided in Section 3.14 Transportation of the Draft EIR. This impact would be less than significant.

- **Impact TRA-2:** *The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).*

The FFTOD Specific Plan Scenario was analyzed using the SCAG 2016 RTP/SCS Travel Demand Forecast Model. Based on the results of the model analysis, the FFTOD Specific Plan scenario would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline. The study area demonstrates relative efficiency in terms of daily VMT per service population, compared to the Los Angeles County's South County Planning Area. The changes included in the FFTOD Specific Plan will further expand the ability for residents and employees to walk, bike, and take transit to complete the trips they need to make, resulting in greater VMT efficiency in terms of daily VMT per service population. These transportation and mobility improvements are included as project design features, but the Travel Demand Forecast Model is not sensitive to these improvements and therefore the VMT estimates do not reflect the actual VMT reduction benefits they may have. Overall, the FFTOD Specific Plan would not conflict with CEQA Guidelines section 15064.3, subdivision (b) related to VMT thresholds. This impact would be less than significant.

- **Impact TRA-3:** *The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*

The FFTOD Specific Plan does not propose any new roads or intersections. None of the transportation system improvements envisioned in the FFTOD Specific Plan would introduce new safety hazards or incompatible uses at intersections or along roadway segments, because most would be designed to improve safe circulation and access to the transit stations for all users. In addition, any new transportation facilities or improvements to facilities associated with the FFTOD Specific Plan would be constructed based on environmental analysis as well as future engineering review consistent with applicable Los Angeles County guidelines and practices, including—but not limited to—the California Manual on Uniform Traffic Control Devices, Caltrans Highway Design Manual, Los Angeles County Municipal Code, and best practices consistent with the Los Angeles County General Plan. Overall, the FFTOD Specific Plan would not substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant.

- **Impact TRA-4:** *The project would not result in inadequate emergency access.*

For the FFTOD Specific Plan Area, Los Angeles County will maintain a current evacuation plan; ensure that new and infill development is provided with adequate emergency and/or secondary access; require visible street name signage; and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. In addition, Los Angeles County and responsible emergency service agencies including the Los Angeles County Fire Department have emergency access and design standards that are based on the size and intensity of development. At the project level, design would meet all applicable emergency access and design standards and adequate emergency access would be provided. It is possible that during the construction phase of transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access to and within the FFTOD Specific Plan Area. Final transportation and mobility improvements are not anticipated to result in inadequate emergency access, and any effects on emergency access would be temporary in nature. Impacts would be less than significant.

## 14. Utilities and Service Systems

**Finding:** The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR

evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact USS-4:** *The project would not 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.*

In 2014, the Los Angeles County Board of Supervisors adopted a Roadmap to a Sustainable Waste Management Future program. This roadmap outlines the process by which Los Angeles County can implement strategies to reduce solid waste generation in unincorporated areas and through Los Angeles County operations. The Florence-Firestone community is part of this program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, impacts would be less than significant.

- **Impact USS-5:** *The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

All solid waste-generating activities in Los Angeles County are subject to the requirements set forth in AB 939, which requires diversion of a minimum of 50 percent of construction and demolition debris. In addition, after 2020, development projects pursuant to the FFTOD Specific Plan will be required to divert 75 percent of solid waste pursuant to AB 341. Additionally, the Florence-Firestone community is part of the Los Angeles County Roadmap to a Sustainable Waste Management Future program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, existing landfills would be able to accommodate solid waste generated by buildout of the FFTOD Specific Plan and impacts to solid waste management facilities would be less than significant. Disposal of waste generated from implementation of the FFTOD Specific Plan would be consistent with all state regulations and the policies in the Los Angeles County Integrated Waste Management Plan. Impacts would be less than significant.

## 4.2 IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

Los Angeles County finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the Final EIR. These findings are based on the discussion of impacts in the detailed issue area analyses and cumulative impacts in Chapter 3 Environmental Analysis of the Draft EIR. An explanation of the rationale for each finding is presented below.

## 1. Air Quality

**Impact AQ-3:** *The project would expose sensitive receptors to substantial pollutant concentrations*.

As discussed in Section 3.2 Air Quality of the Draft EIR criteria air pollutant emissions associated with construction and operation of the FFTOD Specific Plan have the potential to exceed the SCAQMD thresholds of significance. Because implementation of the FFTOD Specific Plan would result in exceedances of the SCAQMD reactive organic gasses (ROG) and nitrogen oxides ($NO_x$) thresholds for construction and/or operation, the FFTOD Specific Plan could contribute to regional health effects associated with ozone, NOx and nitrogen dioxide ($NO_2$), and particulate matter (PM) emissions. However, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible. The SCAQMD has established conservative screening criteria (based on site-specific information) that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds (LSTs) and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. An LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level environmental analysis. Because potential redevelopment could occur close to existing sensitive receptors, the development that would be accommodated by the FFTOD Specific Plan has the potential to expose sensitive receptors to substantial pollutant concentrations of criteria pollutants. Therefore, this impact is potentially significant.

Additionally, heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with construction could generate diesel PM (DPM), which the CARB has identified as a toxic air contaminant (TAC). The exact duration and location of construction for development within the FFTOD Specific Plan Area with respect to sensitive receptors cannot be determined at the time of the program-level analysis. Therefore, it is conservatively assumed that certain construction activities would result in the exposure of sensitive receptors to substantial TAC concentrations. Similarly, due to uncertainty associated with specific development within each land use type identified within the FFTOD Specific Plan, it is possible that development within the FFTOD Specific Plan Area could generate substantial TAC emissions as a result of long-term operations. It is also possible that sensitive receptors could be located at distances from stationary sources that would expose them to substantial TAC concentrations. Therefore, this impact is considered potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-7 would reduce impacts related to substantial pollutant concentrations to a less than significant level. Emissions would be substantially reduced as a result of implementation of MM AQ-1 through MM AQ-3 and MM AQ-7. Implementation of MM AQ-4 would ensure that future development that could generate localized emissions during construction and operations would evaluate and mitigate emissions to ensure that sensitive receptors are not exposed to substantial localized concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known. MM AQ-1, MM AQ-5, and MM AQ-6 would reduce impacts to sensitive receptors associated with construction-related mobile emissions from construction equipment and operational TAC sources. In addition, implementation of MM AQ-6 would ensure that future development that could generate TAC emissions during construction and operations would evaluate and mitigate TAC emissions to ensure that sensitive receptors are not exposed to substantial TAC concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known.

**MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project

representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

**MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, $PM_{10}$-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection;
- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

**MM AQ-3** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings.

**MM AQ-4** For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;

- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**MM AQ-5** When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future.

**MM AQ-6** For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.

Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with

thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.

Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:

- Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;
- Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;
- Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing “No Idling” signs;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;
- Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet;
- Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;
- Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;

- Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;
- Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Rerouting construction trucks away from congested streets or sensitive receptor areas;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;
- Establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible;

- Using haul trucks with on-road engines instead of off-road engines;
- Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;
- Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and
- Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site.

**MM AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM AQ-1 through MM AQ-7 are feasible, finds that these mitigation measures will reduce the impacts related to substantial pollutant concentrations to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 2. Cultural Resources

**Impact CUL-2:** *The project may cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.*

Future development projects pursuant to implementation of the FFTOD Specific Plan could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The FFTOD Specific Plan Area is considered potentially sensitive for archaeological resources. Therefore, ground disturbance is considered to have a high potential for uncovering archaeological resources.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM CUL-2 would reduce impacts to archaeological resources to a less than significant level.

**MM CUL-2:** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be

avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM CUL-2 is feasible, finds that this mitigation measure will reduce the impact related to archaeological resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact CUL-3:** *The project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

Ground disturbance from future development projects pursuant to implementation of the FFTOD Specific Plan could damage fossils buried in soils. Abundant fossils occur in the older Quaternary alluvial deposits in the FFTOD Specific Plan Area. These deposits have produced numerous important fossil specimens. Therefore, the FFTOD Specific Plan Area contains significant, nonrenewable, paleontological resources that are considered to have high sensitivity.

Mitigation Measure

Implementation of Programmatic Mitigation Measure CUL-3 would reduce impacts to paleontological resources to a less than significant level.

**MM CUL-3:** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by

qualified paleontological personnel to have low potential to contain fossil resources.

If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM CUL-3 is feasible, finds that this mitigation measure will reduce the impact related to paleontological resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 3. Greenhouse Gases

**Impact GHG-1:** *The project may generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

The amortized construction-related total and net increase of GHG emissions that are associated with the buildout of the FFTOD Specific Plan (i.e., 2.55 metric tons of carbon dioxide equivalent [MT CO2e]) would exceed the local service population efficiency 2035 target of 2.36 MT $CO_2e$. Therefore, the FFTOD Specific Plan's cumulative contribution to the long-term GHG emissions in the state would be considered potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure AQ-7 would reduce impacts related to greenhouse gases to a less than significant level.

**MM AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM AQ-7 is feasible, finds that this mitigation measure will reduce the impacts related to greenhouse gases to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 4. Hazards and Hazardous Materials

**Impact HAZ-2:** *The project may create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.*

The demolition of buildings has the potential to expose and disturb asbestos containing materials (ACMs) and lead-based paint (LBP). Demolition can cause encapsulated ACMs (if present) to become friable; they are considered a carcinogen once airborne. Demolition of the existing buildings and structures can also release lead into the air if LBP is not properly removed and handled. Such releases could pose significant risks to people living and working in and around the project site as well as to project construction workers. Abatement of all ACM and LBP encountered during any future building demolition would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and SCAQMD.

Cal/OSHA regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, as well as the safe demolition of buildings containing LBP or other lead materials. In addition, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of CCR Title 8, Section 1532.1 (Lead), which establishes exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. The potential exposure of construction workers to ACMs or LBP is a potentially significant impact.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HAZ-1 would reduce impacts related to ACMs or LBP to a less than significant level.

**MM HAZ-1** Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HAZ-1 is feasible, finds that this mitigation measure will reduce the impacts related to a release of hazardous materials into the environment to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact HAZ-4:** *The project may be situated on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 which may create a potentially significant hazard to the public or the environment as a result.*

Lists of hazardous materials sites found on lists compiled pursuant to Government Code Section 65962.5 that occur within or in the vicinity of the FFTOD Specific Plan Area are provided in Table 3.7-1 and Table 3.7-2 of the Draft EIR. A list of 116 sites within the FFTOD Specific Plan Area that have varying degrees of known contamination or reasons to investigate further is provided in Table 3.7-1. These sites include state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. The list also includes sites that are being investigated for suspected but unconfirmed contamination. A list of the 15 sites within the FFTOD Specific Plan Area that could affect groundwater quality is provided in Table 3.7-2. Future redevelopment of individual properties within the FFTOD Specific Plan Area could have unknown recognized environmental conditions related to soils, groundwater, and vapors/gases that could create a significant hazard to the public or the environment.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HAZ-2 would reduce impacts related to hazardous materials sites to a less than significant level.

**MM HAZ-2** Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II

ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.

Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.

Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. The County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HAZ-2 is feasible, finds that this mitigation measure will reduce the impacts related to hazardous materials sites to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 5. Hydrology and Water Quality

**Impact HWQ-5:** *The project may substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner that would create or contribute to runoff water and exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

The FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. However, although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of

capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HYD-1 would reduce impacts to drainage capacity to a less than significant level.

**MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HYD-1 is feasible, finds that this mitigation measure will reduce the impacts related to drainage capacity to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 6. Noise

**Impact NOI-1:** *The project may result in the 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.*

As future development projects pursuant to the implementation of the FFTOD Specific Plan are proposed adjacent to—and in the immediate vicinity of—the LA Metro A Line (Blue) Stations, the noise generated by trains traveling through the FFTOD Specific Plan

Area could, depending on distance, potentially expose new residential uses to excessive rail noise. The Federal Transit Authority (FTA)'s Screening Distance for Noise Assessments should be considered whenever siting these new uses in proximity to the rail alignment. For light rail transit, the screening distance for noise assessment is 350 feet for proposed construction with an unobstructed line of sight to the alignment and 175 feet for those with an obstructed line of sight. Because the FFTOD Specific Plan aims to focus residential development within these distances of existing LA Metro A Line stations, there is potential for the project to expose future noise-sensitive land uses to excessive noise levels and is thus potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure NOI-1 would reduce impacts related to excessive noise to a less than significant level.

**MM NOI-1** At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:

- Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County' exterior noise standards.
- For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM NOI-1 is feasible, finds that this mitigation measure will reduce the impacts related to noise to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact NOI-2:** *The project may result in the generation of excessive groundborne vibration or groundborne noise levels.*

As future development projects would be spread over the FFTOD Specific Plan's 15-year build-out period and construction events are short-term in nature, it is anticipated that there would be an infrequent amount of vibration events at sensitive land use receptors. However, depending on how close an actual receptor location is to a construction site, the type of construction equipment and the type of receptor building (e.g., older residential buildings, modern commercial buildings), the vibration levels at a receptor location could exceed the vibration threshold for structural damage. As such, vibration impacts during construction associated with the FFTOD Specific Plan could be potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure NOI-2 would reduce impacts related to vibration to a less than significant level.

**MM NOI-2** At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM NOI-2 is feasible, finds that this mitigation measure will reduce the impacts related to vibration to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 7. Tribal Cultural Resources

**Impact TCR-1:** *The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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 listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).*

**Impact TCR-2:** *The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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 PRC Section 5024.1*

In accordance with AB 52 and SB 18 requirements, Los Angeles County sent invitation letters to representatives of the nine Native American contacts provided by the Native American Heritage Commission (NAHC) on March 11, 2021, formally inviting tribes to consult with Los Angeles County on the project. The intent of the consultations is to provide an opportunity for interested Native American contacts to work with Los Angeles County during the project planning process to identify and protect tribal cultural resources. Los Angeles County received two responses via email: one response from the Fernandeno Tatavium Band of Mission Indians noted that the FFTOD Specific Plan Area is outside the Fernandeno Tatavium Band of Mission Indians ancestral Tribal boundaries and deferred consultation for the Project to members of the Gabrieleno Indian Tribe; the other response, from the Gabrieleno Band of Mission Indians – Kizh Nation, declined to consult at the time because no immediate ground disturbance would be taking place; however the tribal contact requested to be notified regarding ground disturbance of future development projects. No other tribes responded to Los Angeles County's notification letter.

There are no known tribal cultural resources in the FFTOD Specific Plan Area, but ground-disturbing activities have the potential to cause a substantial adverse change in the significance of tribal cultural resources of a California Native American tribe. Each future development project in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes (which would include follow up with the Gabrieleno Band of Mission Indians – Kizh Nation). Where significant impacts to tribal cultural resources are identified, future development projects would be required to either avoid impacts or implement feasible mitigation measures to reduce impacts.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM CUL-1 through MM CUL-3 would reduce impacts related to tribal cultural resources to less than significant levels.

**MM CUL-1** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI

Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

**MM CUL-2:** Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources,

including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

**MM CUL-3:** Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate

Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM CUL-1 through MM CUL-3 are feasible, finds that these mitigation measures will reduce the impacts related to tribal cultural resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

## 8. Utilities and Service Systems

**Impact USS-1:** *The project may 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*

Any future development project having a direct connection to the sewer system would require a sewer analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades. Additionally, any future development project having a direct connection to the Hooper Avenue Drain or that is tributary to the Glen Avenue Drain would

require a drainage analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades. Also, new development or redevelopments would be responsible for upgrades and undergrounding of electrical transmission lines as determined by Southern California Edison (SCE) in coordination with California Public Utilities Commission (CPUC) and Los Angeles County Public Works after building plan submittal.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM USS-1 through MM USS-3 and MM HYD-1 would reduce impacts related to water supply, sewer, stormwater drainage, and electricity to less than significant levels.

**MM USS-1** Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.

The Golden State Water Company Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations.

**MM USS-2** Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity.

**MM USS-3** New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and

more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.

CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." The following are "Public Interest" criteria:

- Eliminate an unusually heavy concentration of overhead lines
- Involve a street or road with a high volume of public traffic
- Benefit a civic or public recreation area or area of unusual scenic interest
- Be listed as an arterial street or major collector as defined by the governor's OPR Guidelines

Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year "borrow forward" if required), and the creation of a utility underground district.

The following areas deserve some consideration for a Rule 20A undergrounding process:

- Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit.
- Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit.
- Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area.

- Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area.

**MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM USS-1 through MM USS-3 and MM HYD-1 are feasible, finds that these mitigation measures will reduce the impacts related to utilities and service systems to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact USS-2:** *The project may have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.*

While demand for water supply would increase, this anticipated increase would be slightly offset by decreased demand based on conversion of existing industrial uses to mixed use format development. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under build-out of the FFTOD Specific Plan. Increases in residential density would result in increased potential water usage including potable water and fire prevention demand. To service this, the water facility upgrades described in Section 3.16 Utilities and Service Systems of the Draft EIR would be recommended if increased density develops at the locations noted; all other installed water facilities appear to be sufficient for current and proposed buildout.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM USS-1 (listed above) would reduce impacts related to water supply to a less than significant level.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM USS-1 is feasible, finds that this mitigation measure will reduce impacts related to water supply to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

**Impact USS-3:** *The project may result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

A preliminary analysis was performed using available information that shows that the existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition. Several locations are exceptions that may require upgrading based on the level of density/intensity realized in the vicinity. Individual project applicants/developers would need to prepare a sewer analysis, that is part of an individual infrastructure assessment, and consult with Los Angeles County Public Works and Consolidated Sewer Maintenance District (CSMD) regarding future sewer facilities or upgrade considerations. The CSMD would evaluate all development that would occur and conduct its own site-specific analysis of changes to the service trunk and necessary sewer infrastructure upgrades. Additionally, new sewer laterals would be required for new buildings.

Mitigation Measures

Implementation of Programmatic Mitigation Measure USS-2 (listed above) would reduce impacts related to wastewater to a less than significant level.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM USS-2 is feasible, finds that this mitigation measure will reduce impacts related to wastewater to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

# 4.3 SIGNIFICANT UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible, or mitigation would not lessen impacts to less than significant. The following impact would remain significant and unavoidable:

1. **Air Quality**

**Impact AQ-1:** *The project would conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD).*

Despite furthering the regional transportation and planning objectives included within the RTP/SCS and air quality management plan (AQMP), the FFTOD Specific Plan would represent a substantial increase in emissions compared to existing conditions and would exceed SCAQMD's regional operational significance thresholds. As a result, the FFTOD Specific Plan could potentially exceed the assumptions in the AQMP and would not be considered consistent with the AQMP. Therefore, impacts related to conflicts with or obstructing implementation of applicable air quality plans of the SCAQMD would be potentially significant.

Mitigation Measure

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional mitigation measures to reduce these air quality impacts to below a level of significance. Therefore, this impact is significant and unavoidable.

**MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

**MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, $PM_{10}$-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling

dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection;

- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

**MM AQ-3** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings.

**MM AQ-7** Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional mitigation measures to reduce these air quality impacts to below a level of significance. Impact AQ-1 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

**Impact AQ-2:** *The project would result in a cumulatively considerable net increase of criteria pollutants (VOC, NOx, PM10, and PM 2.5) for which the project region is nonattainment (O3) under an applicable federal or state ambient air quality standard.*

Construction activities associated with the FFTOD Specific Plan could potentially exceed the SCAQMD regional thresholds for volatile organic compounds (VOC), NOx, particulate matter with a diameter of 10 microns or less ($PM_{10}$), and particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$). Additionally, the operational phase of the FFTOD Specific Plan at buildout (and potentially overlapping construction and operational activities) would generate air pollutant emissions that exceed SCAQMD's regional significance thresholds for all criteria air pollutant emissions, except sulfur oxides ($SO_x$). Emissions of VOC, NOx, carbon monoxide (CO), $PM_{10}$, and $PM_{2.5}$ that exceed the SCAQMD regional threshold would cumulatively contribute to the ozone, $PM_{10}$, and $PM_{2.5}$ nonattainment designation of the Southern California Air Basin (SCAB).

While buildout of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions, emissions associated with construction and operation of future development of the FFTOD Specific Plan could exceed or contribute substantially to an existing or projected air quality violation. Therefore, implementation of the FFTOD Specific Plan would result in a significant impact because it would significantly contribute to the nonattainment designations of the SCAB. This impact would be potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 (listed above) would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. Implementation of MM AQ-1 through MM AQ-3 would substantially reduce PM and ozone precursor emissions to levels below the SCAQMD thresholds of significance; however, emissions estimates of the overlapping construction and operational activities would continue to exceed the SCAQMD thresholds of significance. Therefore, it is conservatively assumed that construction-related emissions could exceed significance thresholds and, this is impact is significant and unavoidable. Implementation of MM AQ-7 would ban fireplaces in new residential development, and thereby reduce operational emissions of VOC, NOx, and PM. Mitigated emissions are substantially reduced compared to the unmitigated estimates. However, although implementation of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions emission estimates, the operational emissions would continue to exceed the SCAQMD thresholds of significance. In addition, because the specific development projects within the FFTOD Specific Plan Area cannot be

defined at the time of this analysis, precise effectiveness and feasibility of additional measures cannot be determined for individual future projects, and operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures available to address this impact. Therefore, this impact is significant and unavoidable.

Finding: Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures to reduce these air quality impacts to below a level of significance. Impact AQ-2 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

## 2. Cultural Resources

**Impact CUL-1:** *The project may potentially cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.*

Identified historic structures and sites that are eligible or potentially eligible for National Register of Historic Places (NRHP) listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

In addition to the historic resources identified in the Draft EIR, there are numerous other residential and commercial buildings within the FFTOD Specific Plan Area that are older than 50 years (or could reach 50 years and become wroth of consideration during the planning period for the FFTOD Specific Plan). As these structures have not been comprehensively surveyed and evaluated, it is possible that they may be eligible as historic resources if other criteria apply, such as significant associations with important events, people, or have high architectural merit. Therefore, future development projects pursuant to implementation of the FFTOD Specific Plan could adversely affect other historical resources not identified in the Draft EIR. The impact to a historical resource is considered significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. There are no additional mitigation measures to reduce this impact to historical resources to below a level of significance. This is considered a significant unavoidable adverse impact.

**MM CUL-1** For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and

specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

Finding: Implementation of Programmatic Mitigation Measure MM CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. There are no additional mitigation measures to reduce this impact to historical resources to below a level of significance. Impact CUL-1 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

# 5.0 ALTERNATIVES TO THE PROPOSED PROJECTS

## 5.1 ALTERNATIVES CONSIDERED AND WITHDRAWN

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, greenhouse gas emissions, land use and planning, noise, population and housing, public services, recreation, transportation, and utilities and service systems. Without a site specific analysis, impacts on aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources cannot be evaluated. Therefore, another location would not avoid or substantially lessen the effects of the proposed project.

As part of the Los Angeles County General Plan Update, Los Angeles County identified several urban and suburban areas with access to major transit and commercial corridors as priority policy areas for infill development. Alternative sites were not selected for evaluation because the primary purpose of the project is to implement the Los Angeles County General Plan 2035 TOD Program, which is intended to focus on the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, there are three LA Metro A Line Stations (the Slauson, Florence, and Firestone Stations) and the purpose of the project cannot be met by focusing on alternative sites. The FFTOD Specific Plan Area was identified as one of the priority areas for the TOD Program as it is well suited for higher density housing and a mix of uses surrounding existing major commercial, employment, and civic activity nodes served by high-quality transit. The Specific Plan can leverage the community of Florence-Firestone's assets, connecting uses and activities, and attracting future investment. The LA Metro Stations' (Slauson, Florence, and Firestone Stations) proximity to major job centers and regional destinations spanning downtown Los Angeles to Long Beach creates many opportunities for improving the built environment and overall community that other locations would not be able to provide.

Overall, the purpose of the FFTOD Specific Plan is to create a land use and zoning policy tool to enable more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations, and reduce vehicle miles traveled by cars. The Specific Plan development standards and strategies are designed to balance TOD development with community benefits that support a wide range of residents, workers, and small business owners. The land use and mobility concepts focus on improving the connection between the community and the three LA Metro transit stations.

Finding: Los Angeles County finds that an alternative location for the proposed project is infeasible and/or would not meet most project objectives, for the reasons detailed in Section 4.0 Alternatives of the Draft EIR.

## 5.2 ALTERNATIVES FURTHER EVALUATED

The Draft EIR analyzed the following three alternatives:

- Alternative 1: No Project/Development in Accordance with Existing Zoning
- Alternative 2: Firestone TOD Modified Land Use
- Alternative 3: Slauson TOD Focused

Community-wide information regarding dwelling units, population, population per household, nonresidential square footage, and employment projections for each of the alternatives is provided in Table 5.2-1

**Table 5.2-1: FFTOD Specific Plan Area Future Condition (2035)**

| | Units (Households) | Population | Population / Household | Nonresidential Square Feet | Total Employment |
|---|---|---|---|---|---|
| **Proposed Project** | 25,532 | 100,423 | 3.9 | 1,497,753 | 11,408 |
| **Alternative 1: No Project/Development in Accordance with Existing Zoning** | 14,911 | 66,072 | 4.4 | 2,061,510 | 9,591 |
| **Alternative 2: Firestone TOD Modified Land Use** | 25,596 | 101,308 | 4.0 | 1,546,348 | 11,520 |
| **Alternative 3: Slauson TOD Focused** | 22,848 | 91,253 | 4.0 | 1,169,894 | 10,651 |

### 1. Alternative 1: No Project/Development in Accordance with Existing Zoning

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 1 would reduce impacts to public services, recreation, and utilities and service systems. Impacts to transportation would be greater and impacts to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain. The alternative would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system.

The implementation of this alternative would result in less environmental impacts compared to the proposed project and would not be able to achieve as many of the project objectives as the FFTOD Specific Plan. This alternative would not result in changes to existing zoning or meet the objectives of enabling more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone), or reduce vehicle miles traveled because these improvements would not be comprehensively and cohesively implemented in accordance with a uniform design guideline such as the proposed FFTOD Specific Plan.

Finding: Los Angeles County finds that Alternative 1: No Project/Development in Accordance with Existing Zoning, is infeasible because although it would result in less environmental impacts compared to the proposed project for a number of environmental resource categories, it would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system and it would meet fewer of the project objectives and would not realize all the benefits of implementation of the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

**2. Alternative 2: Firestone TOD Modified Land Use**

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 2 would not reduce any impacts and would have greater impacts to air quality, greenhouse gases, noise, recreation, and utilities and service systems. Impacts to aesthetics, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain.

The implementation of this Alternative would result in slightly greater environmental impacts compared to the proposed project. This Alternative would meet all of the objectives of the proposed project including the provision of a transit-oriented development in the project area and provision of an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements and would allow for expanded density through the implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street.

Finding: Los Angeles County finds that Alternative 2: Firestone TOD Modified Land Use, is infeasible because it would result in slightly greater environmental impacts compared to the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

**3. Alternative 3: Slauson TOD Focused**

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 3 would reduce impacts to air quality, cultural resources, greenhouse gases, noise, public services, recreation, and utilities and service systems. Alternative 3 would not have any impacts greater than the proposed project. Impacts to aesthetics, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain but be reduced compared to the proposed project.

The implementation of this Alternative would result in less environmental impacts compared to the proposed project. Alternative 3 would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. This Alternative would meet most of the objectives of providing a transit oriented development in the FFTOD Specific Plan Area and providing an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements.

Finding: Los Angeles County finds that Alternative 3: Slauson TOD Focused, is infeasible because although it is environmentally superior to the proposed project, it would meet fewer of the project objectives and would not realize all the benefits of implementation of the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

# 6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency's statement is referred to as a "Statement of Overriding Considerations." The following sections provide a description of the project's significant and unavoidable adverse impacts and the justification for adopting a statement of overriding considerations.

## 6.1 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Pursuant to Public Resources Code Section 21081(b) and Guidelines Section 15093, Los Angeles County has balanced the benefits of the proposed project against the following unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures with respect to these impacts: (1) air quality; and (2) cultural resources. Los Angeles County also has examined alternatives to the proposed project, none of which both meets the project objectives to the same extent as the proposed project and is environmentally preferable to the proposed project.

Los Angeles County declares that it has adopted mitigation measures to reduce all of the proposed project's environmental impacts to an insignificant level, other than the following:

1. **<u>Air Quality</u>**

   **Impact AQ-1**

   Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. However, impact AQ-1 would remain significant and unavoidable.

   **Impact AQ-2**

   Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. However, impact AQ-2 would remain significant and unavoidable.

**2. Cultural Resources**

**Impact CUL-1**

Programmatic Mitigation Measure CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. Impact CUL-1 would remain significant and unavoidable.

# 7.0 CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the proposed project that outweigh the proposed project's unavoidable adverse effects and provides specific reasons for considering the proposed project acceptable even though the Final EIR has indicated that there will be significant impacts to air quality and cultural resources. Accordingly, this Statement of Overriding Considerations regarding potentially significant adverse environmental impacts resulting from the proposed project, as set forth below, has been prepared. Pursuant to CEQA Guidelines §15093(c), the Statement of Overriding Considerations will be included in the record of the project approval and will also be noted in the Notice of Determination. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the proposed project.

**Provides Employment Opportunities for Highly Skilled Workers:**

FFTOD Specific Plan implementation will provide employment opportunities for a highly skilled workforce during both the construction and operation phases. Buildout of the FFTOD Specific Plan is estimated to generate 2,734 new jobs over existing conditions. Construction of future development projects pursuant to implementation of the FFTOD Specific Plan would also generate employment. Construction would involve multiple projects over an approximately 15-year buildout period; thus, construction employment is not estimated here. The construction effort of all future development projects would involve development of net increases of about 12,110 residential units and 1,183,013 square feet of nonresidential land uses.

**Reduce Vehicle Miles Traveled:**

Implementation of FFTOD Specific Plan would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline, which is consistent with goals to reduce passenger VMT in SCAG's 2020-2045 RTP/SCS.

**Sustainability:**

A key component of the FFTOD Specific Plan is transforming the current circulation network, which largely supports vehicular travel, into a network that places a higher priority on transit, pedestrian, and bicycle mobility, as well as programmatic improvements to support complete streets and improve parking conditions. Streetscape improvements are intended to transform the auto-oriented streetscape into more sustainable, multimodal design. They include elements such as wider sidewalks, bicycle and transit facilities and amenities, landscaping and street trees, and lighting.

**Implements the Objectives Established for the Proposed Project:**

The FFTOD Specific Plan provides comprehensive direction for the development of the Specific Plan Area by establishing transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County TOD Program of the Los Angeles County 2035 General Plan. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

Overall, the purpose of the FFTOD Specific Plan is to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility. The FFTOD Specific Plan facilitates increased housing opportunities and employment-generating uses proximate to the Slauson, Florence, and Firestone TOD station areas to take advantage of the significant local and regional transit services already provided in the area. The proposed pedestrian, bicyclist, and transit-focused improvements throughout the FFTOD Specific Plan Area would help create an opportunity for redevelopment of unique high-quality transit areas in the Florence-Firestone community.

Thus, FFTOD Specific Plan implementation would achieve the five objectives established for the proposed project:

- Enable more opportunities for affordable housing
- Encourage transit oriented development and promote active transportation
- Improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone)
- Reduce vehicle miles traveled
- Streamline the environmental review of future development projects

**Conclusion**

In balancing the benefits of the overall project described above with the proposed project's unavoidable and significant adverse environmental impacts, Los Angeles County finds that the proposed project's benefits individually and collectively outweigh the unavoidable adverse

impacts, such that these impacts are acceptable. Los Angeles County further finds that substantial evidence presented in the Final EIR supports adopting the Final EIR despite the proposed project's potential adverse impacts.

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Artist Credit: “Short Stories” Mural by Willie Middlebrook

# Slauson Station TOC Specific Plan, aka Florence-Firestone TOD Specific Plan

# Mitigation Monitoring and Reporting Program

December 2021

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# MITIGATION MONITORING AND REPORTING PROGRAM

# 1.0 INTRODUCTION

## 1.1 PURPOSE OF MITIGATION MONITORING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to monitor mitigation measures outlined in the Draft Environmental Impact Report (Draft EIR), State Clearinghouse No. 2021030300. The MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code. Section 21081.6 states:

a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:

    1. The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate, or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so, requested by the lead or responsible agency, prepare, and submit a proposed reporting or monitoring program.

    2. The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

## 1.2 EIR SUMMARY

### 1.2.1 Project location

The proposed FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west

by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

## 1.2.2 Project Description

The FFTOD Specific Plan would establish transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5-mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit-oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

## 1.3 ENVIRONMENTAL IMPACTS

### 1.3.1 Impacts Considered Less Than Significant

The Draft EIR identified various thresholds from the CEQA Guidelines among a number of environmental categories that would not be significantly impacted by the FFTOD Specific Plan and therefore did not require mitigation. Impacts to the following environmental resources were found to be less than significant:

- Aesthetics
- Energy
- Geology and Soils
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Transportation

### 1.3.2 Potentially Significant Impacts that Can Be Mitigated, Avoided, or Substantially Lessened

The following were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures:

- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Tribal Cultural Resources
- Utilities and Service Systems

### 1.3.3 Unavoidable Significant Adverse Impacts

The following impacts were identified as Significant and Unavoidable in the Draft EIR:

- Air Quality
- Cultural Resources

# 2.0 MITIGATION MONITORING REQUIREMENTS

## 2.1 LOS ANGELES COUNTY

Los Angeles County is responsible for implementation of the MMRP, with the Los Angeles County Department of Regional Planning (DRP) as lead in coordination. The MMRP will be used by Los Angeles County staff responsible for ensuring compliance with mitigation measures associated with the proposed FFTOD Specific Plan. Monitoring will consist of review of appropriate documentation, such as plans, or reports prepared by the party responsible for implementation or by field observation of the mitigation measure during implementation.

As discussed in the Draft EIR, this EIR is a program EIR prepared in accordance with CEQA Guidelines Section 15168. Although the legally required contents of a program EIR are the same as for a project EIR, program EIRs are typically more conceptual than project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, later activities in the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, many later activities may be within the program EIR's scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a lead agency relies on a program EIR for a later activity, it must incorporate feasible mitigation measures and alternatives from the program EIR into the later activities (Guidelines Section 15168[c][3]). If a later activity would have effects outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis.

The mitigation measures described in this document are for a program-level decision (referred to as "programmatic mitigation measures") and are intended to be used to avoid, minimize, or reduce potentially significant environmental impacts of future development projects pursuant to implementation of the FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from this EIR. As part of these second-tier environmental reviews, the individual project applicants, in coordination with Los Angeles County, will use the programmatic mitigation measures identified in this program document as starting points to determine their applicability to a specific project and to develop additional or more specific mitigation measures (as necessary) for significant adverse impacts identified in the project-specific analysis associated with their specific location and type of action. The CEQA monitoring process includes review, guidance, and reporting components. For second tier documents individual project applicants, in coordination with Los Angeles County, will note which applicable programmatic mitigation measures are being adopted and used and explain why others are not. Individual project applicants will, in coordination with Los Angeles County, provide a schedule for implementing the adopted mitigation measures and for reviewing the implementation of those measures.

Table 2.1-1 (Mitigation Monitoring and Reporting Program) identifies the programmatic mitigation measures by resource area. The table also identifies other mitigation monitoring requirements, including action(s) required, timing of monitoring activity, and the responsible and monitoring agency or party.

**Table 2.1-1: Mitigation Monitoring and Reporting Program (MMRP)**

| # | Environmental Factor | Mitigation | Action Required | When Monitoring to Occur | Responsible Agency or Party | Monitoring Agency or Party |
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| 3.1 | Aesthetics | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.2 | Air Quality | **MM AQ-1** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.<br><br>Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.<br><br>Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449. | Use of Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower; Maintenance of a list of all operating equipment with make, model, and number; restriction of non-essential idling of construction equipment to 5 minutes or less. | Prior to issuance of building permit and throughout construction (during normal construction site inspections) | Project Engineer and Construction Contractor | Los Angeles County |
| 3.2 | Air Quality | **MM AQ-2** Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce $PM_{10}$ and $PM_{2.5}$ emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.<br><br>• Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;<br>• During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186–compliant, PM10-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;<br>• During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection; | Compliance with SCAQMD Rule 403 | Throughout construction (during normal construction site inspections) | Project Engineer and Construction Contractor | Los Angeles County |

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| | | | • During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and<br>• During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour. | | | | |
| 3.2 | Air Quality | **MM AQ-3** | Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or "super-compliant" low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or "super-compliant" low VOC paints or materials that do not require the use of architectural coatings. | Use of water-based or "super-compliant" low VOC paints | Prior to issuance of building permit | Project Engineer and Construction Contractor | Los Angeles County |
| 3.2 | Air Quality | **MM AQ-4** | For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, $PM_{10}$, and $PM_{2.5}$) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:<br>• Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;<br>• Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);<br>• Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;<br>• Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;<br>• Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;<br>• Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;<br>• Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);<br>• Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and<br>• Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations. | Localized criteria pollutant emissions modeling | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| 3.2 | Air Quality | **MM AQ-5** | When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future. | Compliance with CARB's Handbook guidance with regard to sources of TAC emissions. | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.2 | Air Quality | **MM AQ-6** | For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.<br><br>Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.<br><br>Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:<br><br>• Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;<br>• Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;<br>• Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing "No Idling" signs;<br>• Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);<br>• Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;<br>• Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;<br>• Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy; | Site-specific TAC emissions analysis | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| | | • Evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet;<br>• Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;<br>• Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;<br>• Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;<br>• Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;<br>• Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and<br>• Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.<br><br>If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:<br><br>• Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;<br>• Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);<br>• Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;<br>• Rerouting construction trucks away from congested streets or sensitive receptor areas;<br>• Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;<br>• Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;<br>• Establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible;<br>• Using haul trucks with on-road engines instead of off-road engines;<br>• Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;<br>• Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and | | | | |

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| | | | • Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site. | | | | |
| 3.2 | Air Quality | **MM AQ-7** | Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit. | Fireplace restriction | Prior to issuance of building permit | Property Owner/Developer | Los Angeles County |
| 3.3 | Cultural Resources | **MM CUL-1** | For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.<br><br>The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.<br><br>While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress. | Historical resources assessment and SOI Standards for treatment and HABS documentation (as applicable) | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| 3.3 | Cultural Resources | **MM CUL-2** | Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.<br><br>Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County's approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.<br><br>During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. | Phase I cultural resources inventory and if prehistoric or historic subsurface cultural resources are discovered | As part of second-tier environmental review of an individual future development project<br><br>Upon discovery of prehistoric or historic subsurface cultural resources during future ground-disturbing activities of a project | Applicant/Developer<br><br>Construction contractor and qualified archaeologist. | Los Angeles County |

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| 3.3 | Cultural Resources | **MM CUL-3** | Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.<br><br>If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.<br><br>Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.<br><br>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.<br><br>A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place. | Ground-disturbing activities in native soils or sediments at 5 feet or below ground surface<br><br>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage<br><br>Preparation of monitoring and mitigation report of findings and significance | Ground-disturbing activities in native soils or sediments at 5 feet or below ground surface | Construction contractor and qualified paleontologist/ paleontological monitor | Los Angeles County |
| 3.4 | Energy | No programmatic mitigation measures are required. | | n/a | n/a | n/a | n/a |

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| 3.5 | Geology and Soils | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.6 | Greenhouse Gases | Refer to Programmatic Mitigation Measure MM AQ-7. | n/a | n/a | n/a | n/a |
| 3.7 | Hazards and Hazardous Materials | **MM HAZ-1** Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant. | ACM and LBP inspection/survey | Prior to issuance of a demolition permit | Applicant/Developer | Los Angeles County |
| 3.7 | Hazards and Hazardous Materials | **MM HAZ-2** Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.<br><br>Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.<br><br>Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed. | Phase I ESA | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.8 | Hydrology and Water Quality | **MM HYD-1** Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements. | Site-specific infrastructure assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County Public Works |

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| 3.9 | Land Use and Planning | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.10 | Noise | **MM NOI-1** At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:<br>• Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County' exterior noise standards.<br>• For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment. | Preparation of acoustical assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.10 | Noise | **MM NOI-2** At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment. | Preparation of a vibration assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |
| 3.11 | Population and Housing | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.12 | Public Services | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.13 | Recreation | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.14 | Transportation | No programmatic mitigation measures are required. | n/a | n/a | n/a | n/a |
| 3.15 | Tribal Cultural Resources | Refer to Programmatic Mitigation Measures MM CUL-1 through MM CUL-3. | n/a | n/a | n/a | n/a |
| 3.16 | Utilities and Service Systems | **MM USS-1** Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.<br>The Golden State Water Company Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations. | Site-specific infrastructure assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County |

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| 3.16 | Utilities and Service Systems | **MM USS-2** | Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity. | Site-specific infrastructure assessment | As part of second-tier environmental review of an individual future development project | Applicant/Developer | Los Angeles County Public Works |
| 3.16 | Utilities and Service Systems | **MM USS-3** | New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.<br><br>Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.<br><br>CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through "work credits" given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the "public interest." The following are "Public Interest" criteria:<br><br>• Eliminate an unusually heavy concentration of overhead lines;<br>• Involve a street or road with a high volume of public traffic;<br>• Benefit a civic or public recreation area or area of unusual scenic interest; and<br>• Be listed as an arterial street or major collector as defined by the governor's OPR Guidelines<br>Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful "public interest" determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year "borrow forward" if required), and the creation of a utility underground district.<br><br>The following areas deserve some consideration for a Rule 20A undergrounding process:<br><br>• Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit;<br>• Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit;<br>• Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area; and | Coordination with SCE, CPUC, and Los Angeles County Public Works regarding undergrounding of electrical distribution lines | Following building plan submittal | Applicant/Developer | Los Angeles County Public Works |

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| | | • Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area. | | | | |

# 3.0 REPORT PREPARATION

## 3.1 LIST OF PREPARERS

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