June 2024 | Draft Program Environmental Impact Report
State Clearinghouse No. **2023110409**

# LOS ANGELES COUNTY WESTSIDE AREA PLAN

for the County of Los Angeles

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# Abbreviations and Acronyms

## ABBREVIATIONS AND ACRONYMS

| | |
|---|---|
| AAQS | ambient air quality standards |
| AB | Assembly Bill |
| ACM | asbestos-containing materials |
| ADT | average daily traffic |
| amsl | above mean sea level |
| AQMP | air quality management plan |
| AST | aboveground storage tank |
| BAU | business as usual |
| bgs | below ground surface |
| BHCSD | Baldwin Hills Community Standards District |
| BMP | best management practices |
| CAA | Clean Air Act |
| CAFE | corporate average fuel economy |
| CalARP | California Accidental Release Prevention Program |
| CalEEMod | California Emissions Estimator Model |
| CalEMA | California Emergency Management Agency |
| Cal/EPA | California Environmental Protection Agency |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CALGreen | California Green Building Standards Code |
| Cal/OSHA | California Occupational Safety and Health Administration |
| CalRecycle | California Department of Resources, Recycling, and Recovery |
| Caltrans | California Department of Transportation |
| CAP | Climate Action Plan |
| CARB | California Air Resources Board |
| CBC | California Building Code |
| CCAA | California Clean Air ActCCR California Code of Regulations |
| CDE | California Department of Education |
| CDFW | California Department of Fish and Wildlife |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CERCLA | Comprehensive Environmental Response, Compensation and Liability Act |

# Abbreviations and Acronyms

| | |
|---|---|
| CFC | California Fire Code |
| cfs | cubic feet per second |
| CGS | California Geologic Survey |
| CMP | congestion management program |
| CNDDB | California Natural Diversity Database |
| CNEL | community noise equivalent level |
| CO | carbon monoxide |
| $CO_2e$ | carbon dioxide equivalent |
| Corps | US Army Corps of Engineers |
| CSO | combined sewer overflows |
| CSTP | Community Safety Traffic Plan |
| CUPA | Certified Unified Program Agency |
| CWA | Clean Water Act |
| dB | decibel |
| dBA | A-weighted decibel |
| DPM | diesel particulate matter |
| DRP | Los Angeles County Department of Regional Planning |
| DTSC | Department of Toxic Substances Control |
| EIR | environmental impact report |
| EPA | United States Environmental Protection Agency |
| EPCRA | Emergency Planning and Community Right-to-Know Act |
| FEMA | Federal Emergency Management Agency |
| FHWA | Federal Highway Administration |
| FTA | Federal Transit Administration |
| GHG | greenhouse gases |
| GWP | global warming potential |
| HCM | Highway Capacity Manual |
| HMA | Hillside Management Areas |
| HQTA | high quality transit area |
| HVAC | heating, ventilating, and air conditioning system |
| IPCC | Intergovernmental Panel on Climate Change |
| KHSRA | Kenneth Hahn State Recreation Area |
| $L_{dn}$ | day-night noise level |

# Abbreviations and Acronyms

| | |
|---|---|
| $L_{eq}$ | equivalent continuous noise level |
| LBP | lead-based paint |
| LCFS | low-carbon fuel standard |
| LID | low-impact development |
| LOS | level of service |
| LST | localized significance thresholds |
| $M_W$ | moment magnitude |
| MCL | maximum contaminant level |
| MEP | maximum extent practicable |
| mgd | million gallons per day |
| MMT | million metric tons |
| MPO | metropolitan planning organization |
| MT | metric ton |
| MWD | Metropolitan Water District of Southern California |
| NAHC | Native American Heritage Commission |
| NEPA | National Environmental Policy Act |
| $NO_X$ | nitrogen oxides |
| NPDES | National Pollution Discharge Elimination System |
| $O_3$ | ozone |
| OES | California Office of Emergency Services |
| PEIR | Program Environmental Impact Report |
| PM | particulate matter |
| POTW | publicly owned treatment works |
| ppm | parts per million |
| PPV | peak particle velocity |
| PW | Los Angeles County Department of Public Works |
| RCRA | Resource Conservation and Recovery Act |
| REC | recognized environmental condition |
| RMP | risk management plan |
| RMS | root mean square |
| RPS | renewable portfolio standard |
| RTP/SCS | Regional Transportation Plan/Sustainable Communities Strategy |
| RWQCB | Regional Water Quality Control Board |

# Abbreviations and Acronyms

| | |
|---|---|
| SB | Senate Bill |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SEA | Significant Ecological Area |
| SIP | state implementation plan |
| SLM | sound level meter |
| SoCAB | South Coast Air Basin |
| $SO_X$ | sulfur oxides |
| SQMP | stormwater quality management plan |
| SRA | source receptor area [or state responsibility area] |
| SSC | Species of Special Concern |
| SUSMP | standard urban stormwater mitigation plan |
| SWP | State Water Project |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Resources Control Board |
| TAC | toxic air contaminants |
| TNM | transportation noise model |
| tpd | tons per day |
| TRI | toxic release inventory |
| TTCP | traditional tribal cultural places |
| USFWS | United States Fish and Wildlife Service |
| USGS | United States Geological Survey |
| UST | underground storage tank |
| UWMP | urban water management plan |
| V/C | volume-to-capacity ratio |
| VdB | velocity decibels |
| VHFHSZ | very high fire hazard severity zone |
| VMT | vehicle miles traveled |
| VOC | volatile organic compound |
| WQMP | water quality management plan |
| WSA | water supply assessment |
| WSAP | Westside Area Plan |

# Abbreviations and Acronyms

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# 1. Executive Summary

This executive summary provides an overview of the proposed Westside Area Plan (WSAP or proposed Project) and the potential environmental impacts of implementing the proposed Project. In accordance with State California Environmental Quality Act (CEQA) Guidelines Section 15123, this summary identifies: "1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; 2) areas of controversy known to the Lead Agency including issues raised by agencies and the public; and 3) issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects."

## 1.1 INTRODUCTION

This Draft Program Environmental Impact Report (PEIR) addresses the environmental effects associated with the implementation of the proposed WSAP. CEQA requires that local government agencies consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers.

This Draft PEIR has been prepared pursuant to the requirements of CEQA and the County of Los Angeles (County) CEQA procedures. The County, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on County technical personnel from other departments and review of all technical subconsultant reports.

Data for this Draft PEIR derive from on-site field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (aesthetics, agricultural resources, air quality, biological resources, cultural resources, geological resources, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, utilities and service systems, and wildfire).

## 1.2 ENVIRONMENTAL PROCEDURES

This Draft PEIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed project, as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.

2. Identify ways to avoid or reduce environmental damage.

3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.

4. Disclose to the public reasons for agency approval of projects with significant environmental effects.

5. Foster interagency coordination in the review of projects.

6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis, and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

The County has determined that a program-level EIR (a PEIR) is the appropriate level of environmental review for the WSAP. As provided in CEQA Guidelines Section 15168, a PEIR may be prepared on a series of actions that may be characterized as one large project. Use of a PEIR provides the County (as lead agency) with the opportunity to consider broad policy alternatives and program wide mitigation measures and provides the County with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis. According to CEQA Guidelines Section 15168(a), a PEIR may be prepared for a series of actions that can be characterized as one large project and are related:

(1) Geographically,

(2) As logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The proposed Project involves the implementation of an area plan (the WSAP), which would serve as a policy document for the Westside Planning Area (Planning Area). Site-specific and project-level details of future discretionary projects that may occur as a result of the implementation of the proposed Project cannot be known at the time of preparation of this PEIR. The PEIR approach provides the appropriate level of analysis for the nature of the proposed Project and the broad scale of impacts that would result from the WSAP and its associated policies.

### 1.2.1 PEIR Format

**Chapter 1. Executive Summary:** Summarizes the background and description of the proposed Project, the format of this PEIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

**Chapter 2. Introduction:** Describes the purpose of this PEIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final PEIR certification.

**Chapter 3. Project Description:** A detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this PEIR.

**Chapter 4. Environmental Setting:** A description of the physical environmental conditions in the vicinity of the project as they existed at the time the notice of preparation was published, from local and regional perspectives. These provide the baseline physical conditions from which the lead agency determines the significance of the project's environmental impacts.

**Chapter 5. Environmental Analysis:** Twenty environmental topics including in Appendix G of the CEQA Guidelines are analyzed in individual sections that discuss: the existing environmental setting; the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse effects of the project; the level of impact significance before mitigation; the mitigation measures for the proposed Project; the level of significance after mitigation is incorporated; and the potential cumulative impacts of the proposed Project and other reasonably foreseeable development in the area.

**Chapter 6. Significant Unavoidable Adverse Impacts:** Identifies the significant unavoidable adverse impacts of the proposed Project.

**Chapter 7. Alternatives to the Proposed Project:** Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project/Existing General Plan Alternative, Housing Element Residential Units Only Alternative, and No Commercial Development Alternative.

**Chapter 8. Impacts Found Not to Be Significant**: Briefly describes the potential impacts of the proposed Project that were determined not to be significant and were therefore not discussed in detail in this PEIR.

**Chapter 9. Significant Irreversible Changes Due to the Proposed Project:** Describes the significant irreversible environmental changes associated with the proposed Project.

**Chapter 10. Growth-Inducing Impacts of the Project:** Describes the ways in which the proposed Project would cause increases in employment or population that could result in new physical or environmental impacts.

**Chapter 11. Organizations and Persons Consulted and Report Preparation:** Lists the people who prepared this PEIR for the proposed Project.

**Appendices:** The appendices for this document comprise these supporting documents:

- Appendix A: Notice of Preparation and Scoping Meeting Comments
- Appendix B: Air Quality and Greenhouse Gas Emissions Modeling
- Appendix C: Westside Area Plan Biological Resources
- Appendix D: Historic Context Statement
- Appendix E: Cultural Resources Sensitivity Maps
- Appendix F: Westside Area Plan Vehicle Miles Traveled (VMT) Analysis Memorandum

- Appendix G: Paleontological Assessment Memorandum for the Westside Area Plan
- Appendix H: Noise and Vibration Impact Assessment for the Westside Area Plan
- Appendix I: WSAP Opportunities Sites Land Use and Zoning Definitions

## 1.2.2 Type and Purpose of This Draft PEIR

This Draft PEIR has been prepared to satisfy the requirements for a Program EIR (or PEIR). Although the legally required contents of a PEIR are the same as those of a Project EIR, PEIRs are typically more conceptual and may contain a more general or qualitative discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a PEIR may be prepared on a series of actions that may be characterized as one large project. Use of a PEIR provides the County (as lead agency) with the opportunity to consider broad policy alternatives and program wide mitigation measures and provides the County with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis.

Agencies prepare PEIRs 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 PEIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the PEIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities may be within the PEIR's scope, and additional environmental documents may not be required (Guidelines § 15168[c]). When a lead agency relies on a PEIR for a subsequent activity, it must incorporate feasible mitigation measures and alternatives from the PEIR into the subsequent activities (Guidelines § 15168[c][3]). If a subsequent activity would have effects outside the scope of the PEIR, 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 PEIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines encourage the use of PEIRs, citing five advantages:

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR;
- Focus on cumulative impacts that might be slighted in a case-by-case analysis;
- Avoid continual reconsideration of recurring policy issues;

- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them;
- Reduce paperwork by encouraging the reuse of data (through tiering). (Guidelines § 15168[h])

## 1.3 PROJECT LOCATION

The Planning Area, located in the southwest part of the County, is one of 11 planning areas identified in the General Plan. Figure 3-1, *Regional Map*, shows the location of the Planning Area in the County. The Planning Area includes the following unincorporated communities: Ladera Heights, View Park, and Windsor Hills; Marina del Rey; Ballona Wetlands; and Westside Islands, which includes West Los Angeles (LA) /Sawtelle Veterans Affairs (VA), West Fox Hills, Franklin Canyon, and Gilmore Island. Collectively, these communities are referred to as the Planning Area. The Planning Area and its associated communities are identified on Figure 3-2, *Project Location Map*.

Marina del Rey, Ballona Wetlands, and West LA/Sawtelle VA are not anticipated to undergo substantive changes as a result of the proposed Project. Therefore, the WSAP focuses primarily on Ladera Heights, View Park, and Windsor Hills and West Fox Hills. However, the entire Planning Area is discussed throughout this Draft PEIR.

## 1.4 PROJECT SUMMARY

The WSAP (proposed Project) is a community-based plan that focuses on land use and policy issues to address the unique characteristics, needs, and resident objectives for the Planning Area. It is a long-range policy document that will guide long-term growth of the unincorporated communities in the Planning Area through its goals, policies, and implementation actions. The proposed Project would amend the General Plan to establish both areawide and community-specific goals and policies to address local land use concerns and issues. It will also implement Land Use Policy Map and Zoning Ordinance updates based on policies, programs, and action items defined by the General Plan's recently adopted and State-certified 2021-2029 Housing Element as well as changes to facilitate additional housing opportunities and ensure consistency between zoning and land use designations.

The WSAP will include the following elements: land use, mobility, conservation and open space, public services and facilities, economic development, and historic preservation. A primary goal of the WSAP is to augment existing County-adopted land use policies to address community needs and prioritize issues that are central to the lives of community members. Overarching goals of the WSAP will aim to revitalize primary commercial corridors and centers while maintaining the character of existing residential neighborhoods; provide opportunities for the development of affordable housing; concentrate and support mixed-use development in an urban form that reduces vehicle travel and promotes access by walking, bicycling, and transit; improve access to parks and trail connectivity; identify culturally significant landmarks and amplify community identity; and improve pedestrian and traffic safety.

The WSAP identifies 12 Opportunity Sites and the Inglewood Oil Fields (refer to Table 3-1, *Land Use and Zoning Change Summary*, of this Draft PEIR) in the Planning Area (specific to the Ladera Heights, View Park, and Windsor Hills and West Fox Hills). These sites are locations in which residential and mixed-use land use and

zoning changes are proposed, which would allow for increased development densities to implement targets set forth in the Housing Element apart from the Inglewood Oil Field. The Inglewood Oil Field is within the Baldwin Hills Community Standards District (BHCSD), which prohibits new oil wells and production and designates existing uses as "non-conforming," anticipating their phased removal and reuse in the future. The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

**General Plan Amendment No. RPPL2023002433.** The General Plan Amendment would establish the Westside Area Plan as part of the County General Plan. It defines goals and policies for the unincorporated communities of Ladera Heights, View Park, and Windsor Hills and West Fox Hills. The WSAP would add a total of 6,757 residential dwelling units, yielding 6,489 households[1] and 244,000 square feet of non-residential use to these communities. The WSAP includes the following:

- Areawide goals and policies with respect to: Land Use, Mobility, Conservation and Open Space, Public Services and Facilities, Historic Preservation, and Economic Development.
- Action-oriented programs implementing the areawide goals and policies.
- Chapters presenting additional locally defined goals, policies, and implementation programs that are specific to neighborhoods, addressing planning issues unique to these areas that are not addressed through areawide goals, policies, and programs.
- The WSAP would provide for land use changes on identified opportunity sites that would result in increased residential and mixed-use densities totalling 6,489 households and 244,000 square feet of non-residential use to these communities. Updates to the General Plan Land Use Policy Map would:
  - Incorporate land use designations and densities for sites identified to accommodate the Regional Housing Assessment (RHNA) allocation in the adopted 2021-2029 Housing Element.
  - Incorporate designations to accommodate land uses proposed in developing the WSAP.
  - Maintain consistency between zoning and land use policy. In addition to the identified Opportunity Sites, the WSAP Land Use Policy Map would modify designations for properties to reflect their current use and/or density where these, and the densities for sites identified by the Housing Element, deviate from those depicted by the current General Plan Policy Map.

**Zone Change No. RPPL2023002450.** The zone change would update the zoning map for the Planning Area to maintain consistency with the Land Use Policy Map and incorporate proposed rezoning identified in the Housing Element to meet the RHNA goals for County. Table 3-1, *Land Use and Zoning Change Summary*,

[1] Based on the project's proposed densities and intensities, buildout of the WSAP is anticipated to result in up to 6,757 residential dwelling units. However, based on the County's occupancy rate of 96 percent, 6,489 units are anticipated to be populated. Occupied residential dwelling units are referred to herein as "households." The 6,489 households were used as the basis for technical analysis in this PEIR., which analyzes the realistic operational conditions of the proposed Project.

identifies the location, existing land use and zoning designations, and the proposed land use and zoning designations for the identified opportunity sites.

**Advanced Planning Case No. RPPL2023002448.** Title 22 (Planning and Zoning) of the County code would establish a Planning Area Standards District specifying development standards applicable to all unincorporated communities in the Planning Area and would include community-specific standards.

## 1.5 SUMMARY OF PROJECT ALTERNATIVES

Three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the proposed Project. An EIR must identify an "environmentally superior" alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed Project and determined to be environmentally superior, neutral, or inferior. Section 7.7 identifies the Environmentally Superior Alternative. The preferred land use alternative (proposed Project) is analyzed in detail in Chapter 5 of this Draft PEIR.

### 1.5.1 No-Project/Existing General Plan Alternative

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate the specific alternative of "no project" along with its impact. The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As specified in Section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the No Project Alternative (Alternative 1) will be the continuation of the plan, policy, or operation into the future. Therefore, the No Project Alternative, as required by the State CEQA Guidelines, would analyze the effects of not adopting and implementing the WSAP.

Future development under the No Project Alternative would continue to be guided by the County's existing General Plan land use—which does not include the recently adopted Housing Element Update—and zoning designations. The No Project Alternative would result in the continuation of existing conditions and planned development within the Planning Area. No land use or zoning amendments would be processed under this alternative. Implementation of Alternative 1 would result in similar impacts for the majority of issue areas as identified for the Project, with the exception of GHG emissions and wildfire.

### 1.5.2 Housing Element Residential Units Only Alternative

The Housing Element Growth Alternative (Alternative 2) would implement only the residential component of the recently adopted Housing Element. The Housing Element identifies that the Regional Housing Needs Allocation (RHNA) allocation for the Planning Area is 4,972 units, yielding 4,773 households, to meet the broader unincorporated Countywide target of 89,232 units. This alternative represents an approximately 26 percent reduction in residential units (which includes 6,757 units) and 6,489 households compared to the

proposed Project that is included in the WSAP. The identified 12 Opportunity Sites[2] in the WSAP would be the same as the proposed Project, just at reduced densities than proposed by land use and zoning changes. The goals, policies, and implementation strategies in the WSAP would otherwise remain as currently proposed.

By limiting the development within the Planning Area to only the RHNA-allocated units, it would be reasonable to assume that the proposed Project's impacts would be generally reduced by 26 percent under Alternative 2 as they relate to the residential component and would avoid all impacts related to the proposed Project's commercial component. Alternative 2 would achieve the proposed Project's objectives but on a reduced scale compared to the Project since it would allow for fewer housing choices and would fail to meet objectives as they relate to mixed-use development, local economic growth, and prosperity of businesses due to the elimination of the commercial component. Alternative 2 was included for further analysis as an approach to meet the County's RHNA allocation with the goal of decreasing the severity of the proposed Project's environmental impacts.

### 1.5.3 No Commercial Rezone or Land Use Changes Alternative

The No Commercial Rezone or Land Use Changes Alternative (Alternative 3) would implement only the residential component of the proposed Project, which includes 6,757 residential dwelling units, yielding 6,489 households, and would eliminate the 244,000 square feet of non-residential uses that are currently included in the WSAP. By limiting development within the Planning Area to only the residential component, it would be reasonable to assume that all the impacts related to the proposed Project's commercial component would be avoided. The identified 12 Opportunity Sites and Inglewood Oil Field in the WSAP would be the same as the proposed Project. Alternative 3 would achieve the proposed Project's objectives as they relate to housing opportunities but would fail to meet objectives as they relate to mixed-use development, local economic growth, and prosperity of businesses due to the elimination of the commercial component. Alternative 3 was included for further analysis as an approach to exceeding the County's RHNA allocation for the Planning Area with the goal of decreasing the proposed Project's environmental impacts.

## 1.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed Project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this Draft PEIR adequately describes the environmental impacts of the project.

2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.

3. Whether the proposed land use changes are compatible with the character of the existing area.

[2] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSS, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.

5. Whether there are other mitigation measures that should be applied to the project besides the Mitigation Measures identified in the Draft PEIR.

6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

## 1.7 AREAS OF CONTROVERSY

Prior to the preparation of this Draft PEIR, the County issued a Notice of Preparation (NOP) in accordance with Section 15082 of the CEQA Guidelines. The 30-day public review period began on November 16, 2023, and concluded on December 15, 2023. Nine comments letters were received in response to the NOP, which are provided in Appendix A. In addition, the County held a virtual Scoping Meeting on November 30, 2023, in which verbal comments were provided by those in attendance. A summary of the NOP comment letters is provided in Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*. Information regarding the meeting was made available through the County's website at https://planning.lacounty.gov/long-range-planning/westside-area-plan/documents-and-reports/. At the conclusion of the presentation, attendees of the webinar were able to provide comments and questions about the proposed Project to the County and the CEQA consultants during the questions and answers portion of the meeting. Several comments were raised during the scoping meeting regarding oil field operations, traffic congestion, and land use changes.

Based on the scoping process, the primary areas of controversy known to the County included potential impacts to:

- Land use changes and zoning updates (Section 5. 11, *Land Use and Planning*)
- Traffic congestion and vehicle miles traveled (VMT) (Section 5.17, *Transportation*)
- Cumulative density and traffic congestion (Section 5.14, *Population and Housing* and Section 5.17, *Transportation*)
- Hazards associated with the Inglewood Oil Field (Section 5.9, *Hazards and Hazardous Waste*)

## 1.8 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft PEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance after imposition of the mitigation measures is also presented.

# 1. Executive Summary

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**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **5.1 AESTHETICS** | | | |
| **Impact 5.1-1:** Would the proposed Project have a substantial adverse effect on a scenic vista? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.1-2:** Would the proposed Project be visible from or obstruct views from a regional riding, hiking, or multi-use trail? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.1-3:** Would the proposed Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.1-4:** Would the proposed 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 a publicly accessible vantage point.) | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.1-5:** Would the proposed Project create a new source of substantial shadows, light, or glare that would adversely affect day or nighttime views in the area? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.2 AGRICULTURE AND FORESTRY RESOURCES** | | | |
| **Impact 5.2-1:** Would the project 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 | No Impact | No mitigation measures are required. | No Impact |

# 1. Executive Summary

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| California Resources Agency, to nonagricultural use? | | | |
| **Impact 5.2-2:** Would the project conflict with the 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])? | No Impact | No mitigation measures are required. | No Impact |
| **Impact 5.2-3:** Would the project result in the loss of forest land or conversion of forest land to non-forest use? | No Impact | No mitigation measures are required. | No Impact |
| **Impact 5.2-4:** Would the project 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 non-forest use? | No Impact | No mitigation measures are required. | No Impact |
| **5.3 AIR QUALITY** | | | |
| **Impact 5.3-1:** Would the Project conflict with or obstruct implementation of the applicable air quality plan? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.3-2:** Would construction of the Project result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard? | Potentially Significant | AQ-1 In accordance with South Coast Air Quality Management District (South Coast AQMD) Rule 403, the County shall require the following measures to be taken during the construction of all future development projects to reduce the amount of dust and other sources of particulate matter:<br>■ Water exposed soils at least three times daily and maintain equipment and vehicle engines in good condition and in proper tune.<br>■ Wash off trucks leaving development sites and water down all construction areas. | Significant and Unavoidable |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | ■ Replace ground cover on construction sites if it is determined that the site will be undisturbed for lengthy periods.<br>■ Reduce speeds on unpaved roads to less than 15 miles per hour.<br>■ Halt all grading and excavation operations when wind speeds exceed 25 miles per hour.<br>■ Properly maintain diesel-powered on-site mobile equipment.<br>■ Install particulate filters on off-road construction equipment.<br>■ Sweep streets at the end of the day if substantial visible soil material is carried over to the adjacent streets.<br>■ Cover all trucks hauling dirt, sand, soil or other loose material to and from the site.<br>■ Limit truck construction traffic to non-peak times of the morning or afternoon.<br>■ Use surfactants and other chemical stabilizers to suppress dust at construction sites.<br>■ Use wheel washers for construction equipment.<br>AQ-2 The County shall require that applicants for new development projects incorporate the following to reduce air pollutant emissions during construction activities:<br>■ Use construction equipment rated by the United States Environmental Protection Agency as having Tier 4 Final (model year 2008 or newer) or stricter emission limits for engines between 50 and 750 horsepower. If Tier 4 Final equipment is not available, the applicant shall provide documentation or demonstrate its unavailability to the County of Los Angeles prior to the issuance of any construction permits.<br>■ During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the County of Los Angeles. The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site. | |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | ■ Use paints with a VOC content that meets the South Coast Air Quality Management District Super Compliant architectural coatings standard of 10 grams per liter (g/L) or less for coating building architectural surfaces.<br>■ Use paints with a VOC content of 50 g/L or less for parking areas and surfaces.<br>These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the County and shall be verified by the County's Planning Department.<br><br>Policies identified in the WSAP would minimize long-term air quality impacts. However, no additional feasible mitigation measures have been identified that would reduce long-term emissions associated with future residential and commercial land use to less than significant levels. | |
| **Impact 5.3-3:** Would construction of the Project expose sensitive receptors to substantial pollutant concentrations? | Potentially Significant | Implement mitigation measure AQ-1 and AQ-2. | Significant and Unavoidable |
| **Impact 5.3-4:** Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.4 BIOLOGICAL RESOURCES** | | | |
| **Impact 5.4-1:** Would the Project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| **Impact 5.4-2:** Would the Project Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | Less Than Significant | No mitigation measures are required. | | Less Than Significant |
| **Impact 5.4-3:** Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | Less Than Significant | No mitigation measures are required. | | Less Than Significant |
| **Impact 5.4-4:** Would the Project convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10 percent 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.)? | Less Than Significant | No mitigation measures are required. | | Less Than Significant |
| **Impact 5.4-5:** Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites? | Potentially Significant | BIO-1 | Construction, ground-disturbing activities, and vegetation removal for future projects resulting from the WSAP shall avoid activities during the general avian nesting season of February 15 through September 15. If construction of future projects that contain or are immediately adjacent to suitable nesting habitat must occur during the general avian nesting season, a pre-construction clearance survey shall be conducted within seven days prior to the start of construction activities to determine if any active nests or nesting activity is occurring on or within 500 feet of the project. If no sign of nesting activity is observed, construction may proceed without potential impacts to nesting birds. If an active nest is observed during the preconstruction clearance survey, an adequate buffer shall be established around the active nest depending on sensitivity of the species and proximity to project impact areas. Typical buffer distances include up to 300-feet for passerines and up to | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| | | | 500-feet for raptors but can be modified as deemed appropriate by a monitoring biologist. On-site construction monitoring may also be required, if recommended by a qualified biologist, to ensure that no direct or indirect impacts occur to the active nest. Project activities may encroach into the buffer only at the discretion of the monitoring biologist. The buffer shall remain in place until the nest is no longer active as determined by the monitoring biologist. | |
| **Impact 5.4-6:** Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | Less Than Significant | No mitigation measures are required. | | Less Than Significant |
| **Impact 5.4-7:** Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan. | Less Than Significant | No mitigation measures are required. | | Less Than Significant |
| **5.5 CULTURAL RESOURCES** | | | | |
| **Impact 5.5-1:** Development of the project could impact an identified historic resource. | Potentially Significant | CUL-1 | Prior to demolition or alteration of buildings and/or structures or the construction of aboveground infrastructure with potentially significant impacts on historic architectural resources, the project proponent shall retain an architectural historian meeting the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (codified in 36 Code of Federal Regulations [CFR] Part 61; 48 Federal Register 44738–44739) (Qualified Architectural Historian) to conduct a historic resources assessment of affected properties. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a review of other pertinent archives and sources; a pedestrian field survey; recordation of all identified historic architectural resources on California Department of Parks and Recreation (DPR) 523 forms; evaluation of resources which may be eligible for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment for | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| | | | each future project facilitated by WSAP measures and actions. If a historic architectural resource is found eligible by the Qualified Architectural Historian, then the Qualified Architectural Historian shall coordinate with the project proponent and County to ensure the project is constructed in conformance with the Secretary of the Interior's Standards. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to historic resources assessments and Secretary of the Interior's Standards plan reviews). | |
| **Impact 5.5-2:** Development of the project could impact archaeological resources. | Potentially Significant | CUL-2 | Prior to conducting construction activities that would involve ground disturbance, future project proponents shall retain an archaeologist meeting the minimum PQS set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 Federal Register 44738–44739) (Qualified Archaeologist) to conduct an archaeological resources assessment. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a Sacred Lands File search at the California Native American Heritage Commission (NAHC); geoarchaeological review including a focused assessment of land use history and any available geotechnical data to assess the potential for subsurface archaeological resources; a pedestrian field survey in instances where ground surface is exposed; recordation of all identified archaeological resources on DPR 523 forms; evaluation of resources affected by the project for eligibility for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment. Resources that do not qualify as historical resources shall be considered by the Qualified Archaeologist for qualification as unique archaeological resources as defined in Public Resources Code Section 21083.2(g). The technical report also shall provide recommendations as to whether additional studies are warranted to further identify or evaluate archaeological resources (i.e., Extended Phase I boundary delineation, Phase II testing and evaluation) and if archaeological monitoring and Native American monitoring of ground disturbing activities is warranted (e.g., in areas where there is a higher potential to encounter buried resources). Prior to the initiation of field work for any Extended Phase I or | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| | | | Phase II investigation, the Qualified Archaeologist shall prepare a work plan outlining the investigation's objectives, goals, and methodology. When developing a work plan for Native American resources, the County shall consult with local Native American tribes. If archaeological/Native American monitoring is warranted, the Qualified Archaeologist shall determine the locations and duration of monitoring and reporting requirements. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to archaeological resources assessments, Extended Phase I and Phase II reports, and monitoring reports). | |
| | | CUL-3 | For projects with ground-disturbing activities that may encounter potentially significant archaeological resources, the Qualified Archaeologist shall implement a cultural resources sensitivity training program. The Qualified Archaeologist, or their designee, shall instruct all construction personnel of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, applicable laws protecting archaeological resources, and confidentiality of discoveries. Native American monitor(s) shall be invited to participate in presenting tribal perspectives as part of the training curriculum. In the event that construction crews are phased, additional trainings shall be conducted for new construction personnel. The project proponent or its contractors shall ensure construction personnel are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County. | |
| | | CUL-4 | In the event archaeological resources are encountered during construction of a future project, the project proponent shall cease all activity within 50 feet of the find. The discovery shall be evaluated for significance by the Qualified Archaeologist. When assessing significance and developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. If the Qualified Archaeologist determines that the resource is significant—i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5(a) or for unique archaeological resource in Public Resources Code Section 21083.2(g)—the Qualified Archaeologist shall | |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| | | | provide a method for avoidance and preservation in place, which shall be the preferred manner of mitigating impacts. If avoidance is infeasible, the Qualified Archaeologist shall develop a Phase III Archaeological Resources Data Recovery and Treatment Plan consistent with Mitigation Measure CUL-5. The Qualified Archaeologist also shall determine, based on the initial assessment of the discovery, whether the 50-foot buffer may be reduced. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to Extended Phase I, Phase II, and Phase III reports). | |
| | | CUL-5 | Treatment of Archaeological Resources. If the assessment conducted under Mitigation Measure CUL-2 or Mitigation Measure CUL-4 identifies significant archaeological resources—i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5(a) or for unique archaeological resource in Public Resources Code Section 21083.2(g)—then avoidance and preservation in place shall be the preferred manner of mitigating impacts. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If avoidance and preservation in place of significant archaeological resources is determined by the County to be infeasible, then the Qualified Archaeologist shall prepare a Phase III Archaeological Resources Data Recovery and Treatment Plan. The plan shall include: a detailed research design; justification for data recovery or other treatment methods depending on the nature of the resource's eligibility; excavation methodology; and, reporting and curation requirements. When developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. All Phase III reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center. | |
| | | CUL-6 | Disposition of Native American archaeological materials shall be determined by the County in coordination with local California Native American tribes. Disposition of materials may include curation at an accredited or nonaccredited repository, onsite or offsite reburial, and/or donation to a local tribe or public, nonprofit institution with a research interest in the materials, or local school or historical society in the area for educational purposes. The | |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| | | | County shall consider tribal preferences when making a determination of disposition of Native American archaeological materials. Disposition of Native American human remains and associated funerary objects or grave goods (i.e., artifacts associated with human remains) shall be determined by the landowner in consultation with the County and the Most Likely Descendant. The project proponent shall curate all significant historic period archaeological material, or portions thereof at the discretion of the Qualified Archaeologist, at a repository accredited by the American Association of Museums that meets the standards outlined in 36 CFR Section 79.9. If no accredited repository accepts the collection, then the project proponent may curate it at a nonaccredited repository as long as it meets the minimum standards set forth in 36 CFR Section 79.9. If neither an accredited nor a nonaccredited repository accepts the collection, then the project proponent may offer the collection to a public, nonprofit institution with a research interest in the materials, or to a local school or historical society in the area for educational purposes. | |
| **Impact 5.5-3:** Grading activities could potentially disturb human remains. | Potentially Significant | CUL-7 | If human remains are encountered, then the project proponent or its contractor shall immediately halt work within 50 feet of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which require that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition. If the County Coroner determines that the remains are Native American, then the County Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the most likely descendant (MLD). The MLD may, with the permission of the land owner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | analysis of human remains and items associated with Native American burials. The project proponent, County, and landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment. Until the project proponent, County, and landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices (e.g., the NAHC's "A Professional Guide for the Preservation and Protection of Native American Human Remains and Associated Grave Goods" [2022], which reiterates statutory requirements), and that further activities take into account the possibility of multiple burials. If the NAHC is unable to identify an MLD; or the MLD identified fails to make a recommendation; or the landowner rejects the recommendation of the MLD and the mediation provided for in Public Resources Code Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. | |
| **5.6 ENERGY** | | | |
| **Impact 5.6-1:** Implementation of the proposed Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.6-2:** The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency | Less Than Significant | No mitigation measures are required. | Less Than Significant |

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**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **5.7 GEOLOGY AND SOILS** | | | |
| **Impact 5.7-1:** Would the Project directly or indirectly cause a potential substantial adverse effect, including risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking, (iii) seismic-related ground failure, or (iv) landslides? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.7-2:** Would the project result in substantial soil erosion or the loss of topsoil? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.7-3:** Would the project be on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.7-4:** Would the project be on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial risks to life or property? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.7-5:** Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.7-4:** Would the project be on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial risks to life or property? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | | Level of Significance After Mitigation |
|---|---|---|---|---|
| **Impact 5.7-6:** Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | Potentially Significant | GEO-1 | For projects facilitated by the WSAP that involve ground disturbance, the project proponent shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to prepare a paleontological resources assessment report prior to the start of construction activities. The report shall include methods and results of the paleontological resources assessment, monitoring requirements (including depths, frequency, and reporting), and maps that outline where monitoring is required. Monitoring shall follow SVP Guidelines: no monitoring of ground-disturbing activities in units of Low Sensitivity or No Potential; monitoring of all ground-disturbing activities (with depths specified) in units of Low to High Significance; and at all depths in units of High Significance unless the Qualified Paleontologist's report identifies previous disturbances or the use of construction methods that do not warrant monitoring; and monitoring at the initiation of excavation in units of Undetermined Significance. The report also shall stipulate whether screen washing is necessary to recover small specimens following SVP Guidelines and determine whether unique geologic features are present on-site. If monitoring is conducted, then the Qualified Paleontologist shall prepare a final report summarizing monitoring results and submit it to the project proponent and the County. | Less Than Significant |
| | | GEO-2 | Prior to the start of ground-disturbing activities for projects facilitated by the WSAP with potentially significant impacts on paleontological resources, the Qualified Paleontologist or its designee shall conduct construction worker paleontological resources sensitivity training (or may be provided via digital recording) for all construction workers. Construction workers shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The project proponent shall ensure that construction workers are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County. | |
| | | GEO-3 | If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of | |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area determined by the paleontological monitor shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading/excavation contractor shall assist, where feasible, in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, nonprofit institution with a research interest in the material and with retrievable storage, such as the County Natural History Museum, if such an institution agrees to accept the fossils. Accompanying notes, maps, and photographs shall also be filed at the repository. If no institution accepts the fossil collection, it may be donated to a local school or other interested organization in the area for educational purposes. If construction workers discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure. Any salvage reports resulting from implementation of this measure shall be filed with the County Natural History Museum. | |
| **5.8 GREENHOUSE GAS EMISSIONS** | | | |
| **Impact 5.8-1:** Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG. | Less Than Significant | No mitigation measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **5.9 HAZARDS AND HAZARDOUS MATERIALS** | | | |
| **Impact 5.9.1:** Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.9-2:** 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 or waste into the environment? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.9-3:** Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of sensitive land uses | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.9-4:** Would the Project be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.9-5:** Would the Project be 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 result in a safety hazard or excessive noise for people residing or working in the project area? | No Impact | No mitigation measures are required. | No Impact |
| **Impact 5.9-6:** Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

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**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **Impact 5.9-7:** Would the Project 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; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within proximity to land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.10 HYDROLOGY AND WATER QUALITY** | | | |
| **Impact 5.10-1:** Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.10-2:** 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? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.10-3:** Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:(i) result in a substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of | Less Than Significant | No mitigation measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| polluted runoff, (iv) impede or redirect flood flows? | | | |
| **Impact 5.10-4:** 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? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.10-5:** Would the Project conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.10-6:** 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)? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.10-7:** In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.10-8:** Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.11 LAND USE AND PLANNING** | | | |
| **Impact 5.11-1:** Would the Project divide an established community? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.11-2:** Would the WSAP cause a significant environmental impact due to a conflict with any land use plan, policy, or | Less Than Significant | No mitigation measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| regulation adopted for the purpose of avoiding or mitigating an environmental impact? | | | |
| **Impact 5.11-3:** Would the Project conflict with the goals and policies of the General Plan related to Hillside Management Areas and Significant Ecological Areas? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.12 MINERAL RESOURCES** | | | |
| **Impact 5.12-1:** Would the Project 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? | No Impact | No mitigation measures are required. | No Impact |
| **Impact 5.12-2:** Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | No Impact | No mitigation measures are required. | No Impact |
| **5.13 NOISE** | | | |
| **Impact 5.13-1:** 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? | Potentially Significant | N-1 **Construction Noise.** Applicants for future development projects pursuant to implementation of the Westside Area Plan that are within 500 feet of sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the Los Angeles County Department of Public Health (LACDPH) for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the County Noise Ordinance standards (i.e., LACC 12.08.440). All noise-reduction measures approved by LACDPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:<br>■ Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors. | Significant and Unavoidable |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | ■ Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).<br>■ Limit non-essential idling of construction equipment to no more than five minutes per hour.<br>This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the County Noise Ordinance standards (i.e., LACC 12.08.440) for development projects within the Westside Area Plan. | |
| | | N-2 **Operational Noise**. Prior to issuance of a building permit for any future discretionary development projects within the Westside Area Plan that are located within 500 feet of sensitive receptors, project applicant shall submit a noise mitigation plan to LACDPH for review and approval. The noise mitigation plan shall be prepared by a sound engineer and be sufficient for LACDPH to make a determination of whether the project will be in compliance with all applicable County Noise standards and regulations. At minimum, the noise mitigation plan shall include the following information: a list of all electro-mechanical equipment (HVAC, refrigeration systems, generators, etc.) that will be installed at the project site; sound level that would be produced by each equipment; noise-reduction measures, as necessary; and sufficient predictive analysis of project operational noise impact. All noise-reduction measures approved by LACDPH shall be incorporated into the project building plans and be implemented during project construction. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:<br>■ Install permanent noise-occluding shrouds or screens on operating equipment.<br>■ Maintain all equipment and noise control features in accordance with the manufacturer's specifications.<br>■ Orient equipment vents and other sources of sound emissions away from noise-sensitive receptors and/or behind structures, containers, or natural features. | |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | ■ Increase distance between the operating equipment and the noise-sensitive receptor(s) of concern, to the maximum extent feasible.<br>■ Install portable sound-occluding barriers to attenuate noise between the source(s) and the noise-sensitive receptor(s).<br>This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes noise standards for commercial and mixed-use projects within the Westside Area Plan. | |
| | | N-3 **Construction Vibration.** For future development projects that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, and vibratory rollers) within 300 feet of sensitive receptors within the Westside Area Plan, project applicant shall submit a vibration impact evaluation to LACDPH for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the County's standard of 0.01 inches per second RMS vibration velocity [within the range of 1 to 100 Hz frequency]), project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by LACDPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction.<br>Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:<br>■ Jackhammer: 23 feet<br>■ Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet<br>■ Roller (for site ground compaction or paving): 75 feet<br>■ Impact pile-driving: 280 feet<br>This mitigation measure shall not apply and is superseded once a Countywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that | |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| | | ensures project construction groundborne vibration compliance with the County standard of 0.01 inches per second RMS vibration velocity [within the range of 1 to 100 Hz frequency]) for development projects within the Westside Area Plan. | |
| **Impact 5.13-2:** Would the project result in generation of excessive groundborne vibration or groundborne noise levels? | Potentially Significant | Implement mitigation measures N-1 and N-2. | Significant and Unavoidable |
| **Impact 5.13-3:** Would the 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, expose people residing or working in the project area to excessive noise levels? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.14 POPULATION AND HOUSING** | | | |
| **Impact 5.14-1:** Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.14-2:** Would the Project displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

# 1. Executive Summary

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **5.15 PUBLIC SERVICES** | | | |
| ***FIRE PROTECTION AND EMERGENCY SERVICES*** | | | |
| **Impact 5.15-1:** Would the project introduce new structures and residents into the LACFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| ***POLICE PROTECTION*** | | | |
| **Impact 5.15-3:** Would the project introduce new structures and residents into the LASD service boundaries, thereby increasing the requirement for police protection facilities and personnel? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| ***SCHOOL SERVICES*** | | | |
| **Impact 5.15-5:** Would the project generate new students who would impact the school enrollment capacities of area schools? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| ***LIBRARY SERVICES*** | | | |
| **Impact 5.15-7:** Would the project generate new residents who would impact the library capabilities of the Planning Area? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.16 RECREATION** | | | |
| **Impact 5.16-1:** 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? | Less Than Significant | No migration measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **Impact 5.16-2:** Would the project include recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | Less Than Significant | No migration measures are required. | Less Than Significant |
| **Impact 5.16-3:** Would the project interfere with regional trail connectivity? | No Impact | No mitigation measures are required. | No Impact |
| **5.17 TRANSPORTATION** | | | |
| **Impact 5.17-1:** Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.17-2:** Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? | Potentially Significant | T-1 **VMT Reduction Projects.** The County will work with State, regional, and local agencies to reduce regional VMT. Land use policies in the WSAP to improve and/or expand transit service, bicycle and pedestrian facilities, and transportation projects will help the region to achieve the projected decreases in regional VMT. The County will also collaborate with State and other agencies to explore the feasibility of new programs for reducing VMT, such as VMT fees.<br>T-2 **TDM Strategies.** Implementation of TDM strategies, where feasible and necessary based on project- and site-specific considerations, may include but are not limited to those identified below:<br>1. Implement Commute Trip Reduction Marketing<br>2. Provide Ridesharing Program<br>3. Implement Subsidized or Discounted Transit Program<br>4. Provide End-of-Trip Bicycle Facilities<br>5. Provide Employer-Sponsored Vanpool<br>6. Limit Residential Parking Supply<br>7. Unbundle Residential Parking Costs from Property Cost<br>8. Implement Transit-Supportive Roadway Treatments | Significant and Unavoidable |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **Impact 5.17-3:** 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)? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.17-4:** Would the project Result in inadequate emergency access. | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.18 TRIBAL CULTURAL RESOURCES** | | | |
| **Impact 5.18-1:** The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). | Potentially Significant | Implement mitigation measures CUL-2 through CUL-6. | Less Than Significant |
| **Impact 5.18-2:** The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c). | Potentially Significant | Implement mitigation measures CUL-2 through CUL-6 | Less Than Significant |
| **5.19 UTILITIES AND SERVICE SYSTEMS** | | | |
| **Impact 5.19-1:** Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **Impact 5.19-2:** Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.19-3:** Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.19-4:** 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? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.19-5:** Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **5.20 WILDFIRE** | | | |
| **Impact 5.20-1:** Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.20-2:** Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

# 1. Executive Summary

**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation**

| Environmental Impact | Level of Significance Before Mitigation | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|---|
| **Impact 5.20-3:** Would the Project 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? | Less Than Significant | No mitigation measures are required. | Less Than Significant |
| **Impact 5.20-4:** Would the Project 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? | Less Than Significant | No mitigation measures are required. | Less Than Significant |

# 2. Introduction

## 2.1 PROJECT OVERVIEW

The County of Los Angeles (County), as Lead Agency pursuant to the California Environmental Quality Act (CEQA), is preparing a Draft Program Environmental Impact Report (PEIR) for the proposed Westside Area Plan (proposed Project or WSAP). The proposed Project is a community-based plan that is designed to focus on land use and policy issues that are specific to the unique characteristics and needs of the Westside Planning Area (Planning Area) and its communities. The WSAP includes area-wide and community-specific goals, policies, and implementation programs within six different elements. It includes specific updates to land use and zoning designations at identified Opportunity Sites in order increase residential density and commercial and mixed uses in existing commercial corridors, consistent with the County's certified 6th Cycle Housing Element 2021-2029.

## 2.2 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft PEIR has been prepared to satisfy CEQA and the CEQA Guidelines. An EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of a proposed project, and to indicate possible ways to reduce or avoid environmental damage through mitigation measures and project alternatives. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (Public Resources Code, Section 21067). The County of Los Angeles has the principal responsibility for approval of the WSAP. For this reason, the County of Los Angeles is the CEQA lead agency for this project. The intent of the Draft PEIR is to provide sufficient information on the potential environmental impacts of the proposed WSAP to allow the County of Los Angeles to make an informed decision regarding approval of the project.

This Draft PEIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Section 21000 et seq.)
- State Guidelines for the Implementation of CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations [CCR], Sections 15000 et seq.)

The overall purpose of this Draft PEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects associated with implementation of the proposed WSAP. This Draft PEIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

## 2.3 TYPE, PURPOSE, AND INTENDED USES OF THE PEIR

Although the legally required contents of a PEIR are the same as those of a Project EIR, PEIRs are typically more conceptual and may contain a more general or qualitative discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in CEQA Guidelines Section 15168, a PEIR may be prepared on a series of actions that may be characterized as one large project. Use of a PEIR provides the County (as lead agency) with the opportunity to consider broad policy alternatives and program wide mitigation measures and provides the County with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis. According to CEQA Guidelines Section 15168(a), a PEIR may be prepared for a series of actions that can be characterized as one large project and are related:

(1) Geographically,

(2) As logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

A PEIR is appropriate for the proposed Project because it satisfies Section 15168(a). The Project area includes the unincorporated areas of Westside Los Angeles County; and therefore, it is under the County's rules, regulations, plans, and other general criteria and it is carried out under one regulatory authority, the County. While the Planning Area includes a diverse array of existing land uses, the environmental effects of the WSAP can be mitigated in similar ways, as changes from the existing land use designations and zoning to the proposed land use designations and zoning are similar.

Once a PEIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document needs to be prepared. However, if the PEIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the PEIR scope and additional environmental documents may not be required (CEQA Guidelines Section 15168[c]). When a PEIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the PEIR into the subsequent activities (CEQA Guidelines Section 15168[c][3]). If a subsequent activity would have effects that were not examined in the PEIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR (CEQA Guidelines Section 15168[c][1]). In this case, the PEIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines encourages the use of PEIRs, citing five advantages in Section 15168(b):

(1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,

(2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,

(3) Avoid duplicative reconsideration of basic policy considerations,

(4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and

(5) Allow reduction in paperwork.

The proposed Project involves the implementation of an areawide plan (the WSAP), which would serve as a policy document for the Westside Planning Area. Site-specific and project-level details of future discretionary projects that may occur as a result of the implementation of the proposed Project cannot be known at the time of preparation of this PEIR. The PEIR approach provides the appropriate level of analysis for the nature of the proposed Project and the broad scale of impacts that would result from the WSAP and its associated policies.

## 2.4 NOTICE OF PREPARATION AND SCOPING MEETING

The County of Los Angeles determined that a PEIR would be required for this project and issued a Notice of Preparation (NOP) in accordance with Section 15082 of the CEQA Guidelines. The 30-day public review period began on November 16, 2023, and concluded on December 15, 2023. The NOP was distributed to the State Clearinghouse, public agencies, special districts, responsible and trustee agencies, and other interested parties; and was filed with the Los Angeles County Clerk. Printed copies of the NOP were available for public review at five library locations within the Planning Area. In addition, electronic copies were made available for download on the County's website at: https://planning.lacounty.gov/long-range-planning/westside-area-plan/documents-and-reports/.

The NOP process assists in determining the scope of the environmental issues to be addressed in the Draft PEIR. All issues considered to be Potentially Significant, Less than Significant and No Impact are addressed in this Draft PEIR.

Pursuant to Public Resources Code 21083.9 and CEQA Guidelines Section 15082(c), the lead agency is required to conduct at least one scoping meeting for projects of state-wide, regional, or area-wide significance. Thus, the County held a virtual scoping meeting on Thursday, November 30, 2023, from 5:30 p.m. to 7:00 p.m. A total of 26 members of the community attended the virtual scoping meeting. Comments received during the 30-day scoping period are summarized in Table 2-1, *Summary of Scoping Comments Received*. At the conclusion of the presentation, attendees of the scoping meeting were able to provide comments and questions about the Project to County staff and the project consultants during the question and answer portion of the meeting. Nine comment letters were received from agencies, organizations, and tribes in response to the NOP. All comment letters received, as well as comments received during the scoping meeting, are provided in Appendix A to this Draft PEIR.

# 2. Introduction

**Table 2-1 Summary of Scoping Comments Received**

| NOP | Commenting Agency/Person | Date | Comment Summary | Issue Addressed In: |
|---|---|---|---|---|
| Westside Area Plan | Native American Heritage Commission (NAHC) | 11/16/23 | • Recommends tribal consultation under Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18) pursuant to NAHC's recommendation for conducting cultural resources assessments.<br>• Provides guidance and recommendations on how to conduct tribal consultation pursuant to AB52 and SB18. | Section 5.18, *Tribal Cultural Resources* |
| | City of Beverly Hills Community Development Department | 11/21/23 | • Requests clarification for proposed changes related to Beverly Hills Island and Franklin Canyon. | Section 5.11, *Land Use and Planning* |
| | Carousel School | 11/30/23 | • Requests clarification for the proposed zoning map for West Fox Hills. | Chapter 3, *Project Description* and Section 5.11, *Land Use and Planning* |
| | Department of Transportation California State Transportation Agency (Caltrans) | 12/5/23 | • Recommends that a traffic safety impact analysis for any future development is prepared.<br>• Provides link for further information and emphasizes VMT as the standard transportation analysis metric. | Section 5.17, *Transportation* |
| | Gabrieleno Band of Mission Indians-Kizh Nation | 12/6/23 | • Requests tribal consultation for all future projects within the Planning Area.<br>• Provides summary of components of AB52 and SB18 and provides recommendations for conducting cultural resource assessments. | Section 5.18, *Tribal Cultural Resources* |
| | Los Angeles County Sanitation Districts (LACSD) | 12/12/23 | • Provides information regarding the sphere of influence for the LACSD which does not include a majority of the Planning Area.<br>• Request that all future projects within their service area are reviewed to ensure sufficient sewer capacity exists. | Section 5.19, *Utilities and Service Systems* |
| | Los Angeles County Metropolitan Transportation Authority (Metro) | 12/12/23 | • Provides recommendations and specific detail on transit services, facilities and key items to consider with transit-oriented development and on the scope and content of environmental information that should be included in the PEIR. | Section 5.17, *Transportation* |
| | Department of Toxic Substances Control (DTSC) | 12/14/23 | • Determined multiple active and nonactive mitigation and cleanup sites within the Planning Area.<br>• Requests the consideration of construction activities within the Planning Area and that information on project site areas are reviewed in EnviroStor for more information. | Section 5.10*, Hazards and Hazardous Materials* |
| | United Homeowners Association II(UHA) | 12/15/23 | • Requests clarification on the primary focus of the WSAP and any changes to land uses and policies.<br>• Expresses concern for fire safety since a portion of the planning area is in a Very High Fire Hazard Severity Zone. | Chapter 3, *Project Description* and Section 5.11, *Land Use and Planning* |

## 2.5 SCOPE OF THIS DRAFT PEIR

Preparation of the Draft PEIR follows and is informed by the scoping process. Article 9 of the CEQA Guidelines (CEQA Guidelines Sections 15120–15132) establishes the required contents of an EIR. These are summarized below.

(1) Table of contents or an index: A table of contents is provided.

(2) Summary: An executive summary is provided.

(3) Environmental Setting: The environmental setting is described from a regional and local perspective in Chapter 4, *Environmental Setting*.

(4) Project Description: A description of the Project is provided in Chapter 3, *Project Description*.

(5) Analysis of impacts of the proposed project: Potential impacts of the Project are described in Chapter 5, *Environmental Analysis*.

(6) Consideration and discussion of mitigation measures proposed to minimize potential significant impacts: Mitigation measures are proposed to minimize potential significant impacts (see, e.g., Table ES-1, Summary of Proposed Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation).

(7) Consideration and discussion of alternatives to the proposed project, including a No Project Alternative: The alternatives development screening process, alternatives rejected from detailed consideration, and the alternatives evaluated in detail in this Draft PEIR are described in Chapter 7, *Project Alternatives*.

(8) Organizations and persons consulted: Federal, state, and local agencies; Tribal entities and members; and organizations and individuals consulted pursuant to the preparation of this Draft PEIR are identified in Chapter 11, *Organizations and Persons Consulted*.

### 2.5.1 Potentially Significant Adverse Impacts

The Los Angeles County Department of Regional Planning determined that 20 environmental factors have potentially significant impacts if the proposed project is implemented. These are addressed in detail in Chapter 5, *Environmental Analysis*, of this Draft PEIR.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreations
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

### 2.5.2 Unavoidable Significant Adverse Impacts

This Draft PEIR identifies three significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The County must prepare a "statement of overriding considerations" before it can approve the project, attesting that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable. The impacts that were found in the Draft PEIR to be significant and unavoidable are:

- Air Quality
- Noise
- Transportation

## 2.6 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft PEIR, consistent with Section 15150 of the CEQA Guidelines, including but not limited to the following:

- County of Los Angeles 2035 General Plan and EIR, County of Los Angeles, Department of Regional Planning (2015)
- County of Los Angeles 2045 Climate Action Plan and EIR, County of Los Angeles, Department of Regional Planning (2024)

- County of Los Angeles General Plan Safety Element Update, County of Los Angeles, Department of Regional Planning (2022)
- Housing Element 2021-2029 and EIR, County of Los Angeles, Department of Regional Planning (2022)
- Los Angeles County Zoning Code, Title 22, (2022)
- Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]), SCAG (2020)
- Vision Zero, County of Los Angeles, Department of Public Works (2019)
- Community Traffic Safety Plan, County of Los Angeles, Department of Public Works (2023)

## 2.7 FINAL PEIR CERTIFICATION

This Draft PEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the Draft PEIR to the County address shown on the title page of this document. Upon completion of the 45-day review period, the County of Los Angeles will review all written comments received and prepare written responses for each. A Final PEIR will incorporate the received comments, responses to the comments, and any changes to the Draft PEIR that result from comments. The Final PEIR will be presented to the County of Los Angeles for potential certification as the environmental document for the project. All persons who comment on the Draft PEIR will be notified of the availability of the Final PEIR and the date of the public hearing before the County.

The PEIR is available to the general public for review at various locations:

- County of Los Angeles Department of Regional Planning; 320 West Temple Street, Los Angeles, CA 90012
- View Park Bebe Moore Cambell Library; 3854 W 54th Street, Los Angeles, CA, 90043
- Baldwin Hills Branch Library; 2906 S La Brea Avenue, Los Angeles, CA, 90016
- Angeles Mesa Branch Library; 2700 W 52nd Street, Los Angeles, CA, 90043
- Inglewood Public Library; 101 W Manchester Blvd, Inglewood, CA, 90301
- Lloyd Taber Library/ Marina del Rey Library; 4533 Admiralty Way, Marina del Rey, CA, 90292

## 2.8 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a Negative Declaration pursuant to 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The Mitigation Monitoring Program for the WSAP will be completed as part of the Final PEIR, prior to consideration of the project by the Los Angeles County Board of Supervisors.

# 2. Introduction

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# 3. Project Description

Chapter 3 of this Draft Program Environmental Impact Report (PEIR) provides a description of the proposed Westside Area Plan (WSAP or proposed Project). The WSAP is a long-range policy document proposed by the County of Los Angeles (County) to guide long term growth in the unincorporated communities of the Westside Planning Area (Planning Area). The purpose of this chapter is to describe the proposed Project in a manner that will be meaningful for review by the public, reviewing agencies, and decisionmakers in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Title 14, Sections 15000 et seq.).

## 3.1 PROJECT LOCATION

The Planning Area, located in the southwest part of Los Angeles County, is one of 11 planning areas identified in the General Plan. Figure 3-1, *Regional Map* shows the location of the Planning Area in the County. The Planning Area includes the following unincorporated communities of the Los Angeles County: Ladera Heights, View Park and Windsor Hills; Marina del Rey; Ballona Wetlands; and Westside Islands, which includes West Los Angeles (Sawtelle Veterans Affairs [VA]), West Fox Hills, Franklin Canyon, and Gilmore Island. Collectively, these communities are referred to as the Planning Area. The Planning Area and its associated communities are identified on Figure 3-2, *Project Location Map*.

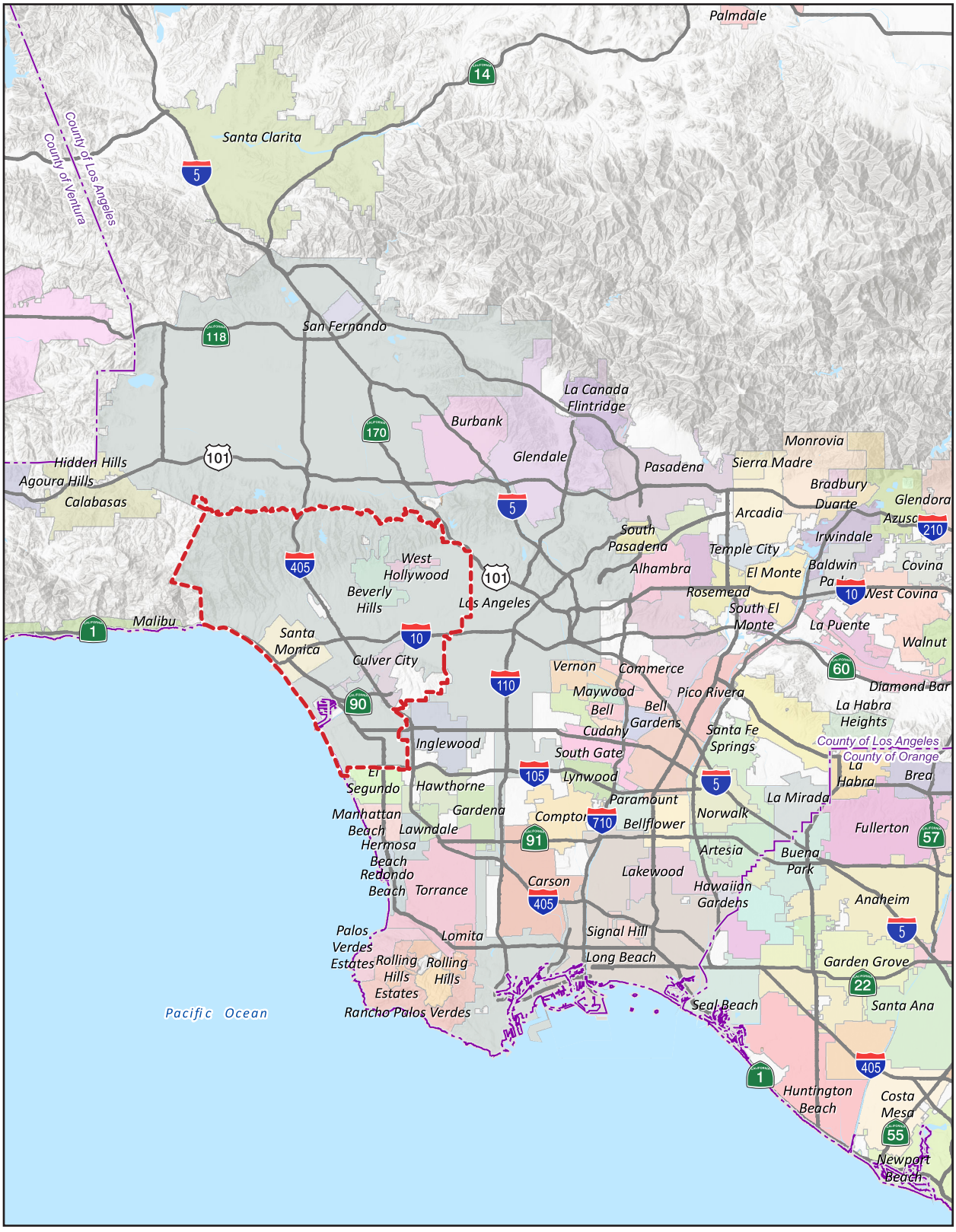
While the WSAP addresses each of its unincorporated communities, its focus is on Ladera Heights, View Park-Windsor Hills, and West Fox Hills, as the remaining areas are managed through other plans, agencies, or agreements. Ballona Wetlands, Marina del Rey, and Westside Islands, excluding West Fox Hills, are not anticipated to undergo substantive changes as a result of the proposed Project. The Ballona Wetlands is a significant ecological resource owned by the state of California, managed by the California Department of Fish and Wildlife, and subject to an ongoing multiagency restoration project. Marina del Rey is in the Coastal Zone, and a Local Coastal Program amendment is not within the scope of this project. Determination of Marina del Rey's future uses and improvements will be the subject of a separate planning process recently initiated by the Los Angeles County Department of Beaches and Harbors under the moniker "Marina del Rey for All". The unincorporated area of West LA (Sawtelle VA) is owned by and subject to the jurisdiction of the federal government and is currently undergoing a separate master plan effort. Gilmore Island, a small unincorporated parcel of land in the Fairfax neighborhood of the City of Los Angeles, is occupied by a parking lot integrated cohesively within the overall CBS Television City studio complex. Its zoning for Major Commercial (C-MJ) use is consistent with the site's current use and the long-term use of the surrounding properties. Franklin Canyon is largely undevelopable due to its environmental setting, natural resources, and fire hazards and is mostly used as parkland and trails managed by the Mountains Recreation and Conservation Authority. Therefore, WSAP and this Draft PEIR focus primarily on Ladera Heights, View Park, Windsor Hills, and West Fox Hills.

## 3.2 STATEMENT OF OBJECTIVES

The unincorporated communities of the Planning Area encompass vibrant neighborhoods that collectively recognize and celebrate history, people, diversity, and culture. The WSAP furthers the efforts to promote active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to foster economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to support sustainable mobility options in an enhanced built environment. The primary objectives of the WSAP are to:

- Preserve community character by focusing new housing and commercial development within existing commercial corridors and centers and in proximity to transit, while allowing changes in existing residential neighborhoods consistent with State legislation.
- Provide greater housing choices for residents, consistent with the Housing Element.
- Foster the economic health and prosperity of local businesses by promoting a mix of uses and adaptability of buildings in response to the evolving commercial marketplace, nurturing small businesses, and attracting job opportunities and commercial services that serve local residents.
- Prioritize the development of businesses that serve and are accessible to their neighborhoods and reflect the history and culture of the Westside Planning Area.
- Transform today's automobile dominant land use pattern and densities and improve streetscapes to promote a more active pedestrian environment.
- Promote the inclusion of publicly accessible plazas and courtyards in new commercial and mixed-use development projects where residents can gather, participate in events, and celebrate the history and culture of the community.
- Protect open spaces and natural resources while emphasizing sustainable building practices and implementing infrastructure improvements that are environmentally sensitive and minimize impacts on energy, water, air, and climate.
- Provide a diversity of travel choices by enabling residents to efficiently and safely access destinations throughout the community by walking, biking, using public transit, and emerging forms of transportation.

# Figure 3-1 - Regional Map




Source: County of Los Angeles 2023; PlaceWorks 2024.

# 3. Project Description

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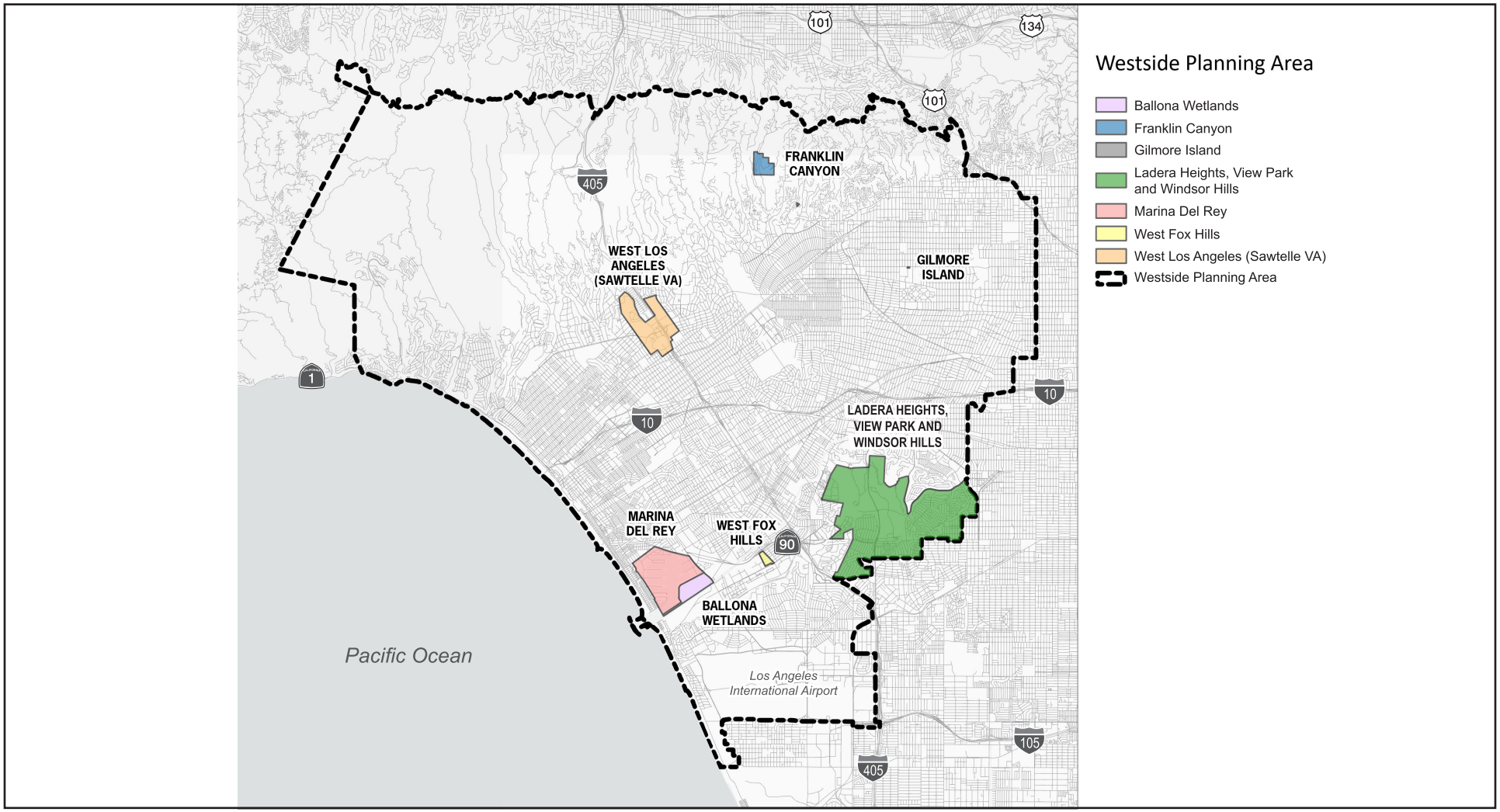
## Figure 3-2 - Project Location Map




*Source: County of Los Angeles 2023; PlaceWorks 2024.*

# 3. Project Description

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# 3.3 BACKGROUND AND RELATIONSHIP TO REGIONAL PLANNING DOCUMENTS

The WSAP is a component of the General Plan (including the 2045 Climate Action Plan, Bicycle Master Plan, and Marina del Rey Local Coastal Program) and is closely related to the other County planning efforts, including the Community Traffic Safety Plan and Los Angeles County Vision Zero Action Plan. It is also closely related to other regional planning documents, including the Los Angeles County Metropolitan Transportation Authority (Metro) Active Transportation Strategic Plan (ATSP) (Metro 2023) and the Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Plan (SCS), and Connect SoCal (SCAG 2024). The goals, policies, and actions in these various plans helped to inform, support, align, and guide the goals, policies, and actions of the WSAP. Each of these applicable plans is summarized below.

## 3.3.1 Los Angeles County General Plan

The Los Angeles County General Plan (General Plan) provides the policy framework for establishing the long-range vision for the growth and development of unincorporated areas within the County, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. The General Plan identifies a total of 11 geographically delineated Planning Areas, one of which is the Westside Planning Area. The County creates area plans for each planning area that focus on land use and policy issues specific to each geographical area, providing a mechanism to draft policies and programs that respond to the unique and diverse character of local communities. Upon adoption, the WSAP would become part of the General Plan.

The General Plan includes ten elements—Land Use, Mobility, Air Quality (including the 2045 Climate Action Plan or CAP), Conservation and Natural Resources, Parks and Recreation, Noise, Safety, Public Services and Facilities, Economic Development, and 2021-2029 6th Cycle Housing Element—all of which are incorporated by reference throughout this Draft PEIR. As a component of the General Plan, the WSAP is guided by and consistent with the following Guiding Principles of the General Plan, including those principles related to smart growth and providing healthy, livable, and equitable communities and community voice:

- **Employ Smart Growth.** Shape new communities to align housing with jobs and services; and protect and conserve the County's natural and cultural resources.
- **Ensure community services and infrastructure are 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.
- **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.
- **Promote excellence in environmental resource management.** Carefully manage the County's natural resources in an integrated way that is both feasible and sustainable.

- **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.

- **Promote strengths, community voice and equity outcomes.** Identify and value existing community assets, culture, and knowledge, informed by community engagement and participation, and seek to embed cultural and racial equity and other equity considerations.

#### 3.3.1.1 2045 CLIMATE ACTION PLAN

The County has prepared the 2045 Climate Action Plan (CAP), which is an update to the 2020 Community Climate Action Plan (CCAP) that was adopted in 2015. It sets new targets and goals for 2030, 2035, and 2045 that align with State goals for a reduction in greenhouse gas emissions (GHG) and provides a blueprint for deep carbon reductions in unincorporated areas of Los Angeles County. The 2045 CAP builds upon the existing and ongoing efforts of the 2020 CCAP and focuses on strategies, measures, and actions to reduce GHG emissions in unincorporated areas. Board adoption of the CAP is anticipated in June 2024. Section 5.5, *Greenhouse Gas Emissions*, provides a more detailed summary of the content of the 2045 CAP and the WSAP's consistency with the applicable goals and policies set forth in in the 2045 CAP.

#### 3.3.1.2 BICYCLE MASTER PLAN

Los Angeles County Department of Public Works (PW) is updating the Los Angeles County Bicycle Master Plan (BMP). The current BMP was last updated in 2012 and established a vision for the future of biking. The BMP serves as a guide for the development of safe and accessible bikeways and paths within unincorporated Los Angeles County and along County flood control district channels. The BMP update will propose new bikeways, revisit the feasibility of unconstructed bikeways from the 2012 plan, incorporate new policies to share bikeway facilities with micro-mobility devices, identify first/last mile bikeway improvements to further connect to transit stations and bus stops, and prepare for the programmatic environmental impact report. The BMP update will engage with community members, community-based organizations, and advisory committees to develop an inclusive and representative BMP. The BMP update will be finalized in early 2025.

#### 3.3.1.3 MARINA DEL REY LOCAL COASTAL PROGRAM

The Marina del Rey Land Use Plan (LUP) is a component of the Marina del Rey Local Coastal Program, which was adopted in 1996, and amended in 2012. The Land Use Plan guides development in the 804-acre County-owned marina. The LUP was developed to address future land use, new access, recreation and resource protection areas, and improvement of existing facilities. The implementation program for the LUP is the Marina del Rey Specific Plan, which is contained in County Code Title 22. There are no proposed land use changes in Marina del Rey under the WSAP.

### 3.3.2 County Code (Title 22)

Working in tandem with the General Plan to implement the goals and policies outlined therein is the County Code. The County Code codifies the County's Zoning Code (Title 22, Planning and Zoning). The Zoning Code,

together with the Subdivision Code (Title 21) and zoning map, are implementation tools of the General Plan that provide details on specific allowable uses, design and development standards, and procedures in accordance with the land use designations assigned per the General Plan or applicable community-based plan(s). Zoning and subdivision regulations govern the division, design, and use of individual parcels of land, including minimum lot size, lot configuration, access, height restrictions, and yard setbacks standards for structures.

The County Code also establishes and defines the community standards districts (CSDs), referenced in the General Plan. The CSDs apply three different types of development standards to a given community, which are: (1) community wide, (2) zone specific, or (3) area-specific development standards. Community-wide development standards apply to all proposed development and new land uses on any lot within the area covered by the CSD. Zone-specific standards refer to standards that apply only to proposed development or a new land use on a lot covered by a specific zone within the community, and which build upon Countywide zoning standards set forth in the Zoning Code. If a zone-specific development standard appears to conflict with a community-wide development standard, the zone-specific standard shall supersede the community-wide standard. Area-specific standards apply only to lots within one or more specific geographic areas of a CSD. Where an area-specific development standard differs from either a community-wide or zone-specific development standard, the area-specific standard shall supersede all others. In addition to implementing area-specific, community-wide, and/or zone-specific development standards, as applicable, CSD regulations could include regulatory requirements related to density bonuses, inclusionary housing policy (County of Los Angeles 2024), Accessory Dwelling Units (ADUs), and/or Junior Accessory Development Units (JADUs), among others. Over 25 CSDs have been established as a result of Division 10 of the Zoning Code.

#### 3.3.2.1 BALDWIN HILLS COMMUNITY STANDARDS DISTRICT

Within the Planning Area is the Baldwin Hills Community Standards District (BHCSD), which was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills areas of the County. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021, Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period. While the Inglewood Oil Field offers the opportunity for future changes of use, the WSAP implements the provisions of the BHCSD and defers recommendations for new land uses to future planning studies. Therefore, there are no land use or zoning changes proposed to the BHCSD through the WSAP.

### 3.3.3 Community Traffic Safety Plan

In response to a Board Motion passed in August 2022, PW is developing a Community Safety Traffic Plan (CSTP) for the unincorporated neighborhoods of Ladera Heights, View Park, and Windsor Hills. The CSTP will consist of traffic engineering reviews that include, but are not limited to, the feasibility of designs for road diets to curb excessive speeding, signal modifications, and residential speed mitigation throughout the community. The CSTP will identify traffic safety focus areas within the Ladera Heights, View Park, and Windsor Hills neighborhoods and provide conceptual designs that will lead to constructible projects. The outreach and engagement for the Ladera Heights, View Park, and Windsor Hills CSTP will provide community members the opportunity to not only learn about the project, but also communicate their experiences, concerns, and ideas regarding traffic safety in their community.

### 3.3.4 Los Angeles County Vision Zero Action Plan

Vision Zero is a traffic safety initiative to eliminate traffic-related fatalities in Los Angeles County. The Vision Zero Action Plan focuses the County's efforts over the next five years to achieve the goal of eliminating traffic-related fatalities on unincorporated County roadways by 2035. This Plan defines a vision for the future and describes objectives and actions to enhance traffic safety in collaboration with government and community partners.

### 3.3.5 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment Plus (PNA+)

Adopted by the Board of Supervisors on December 6, 2022, PNA+ is a national model for park equity and planning that assesses the County's needs with respect to environmental conservation and restoration, regional recreation, and rural recreation. PNA+ builds on the Los Angeles Countywide Parks and Recreation Needs Assessment (PNA) of 2016, which comprehensively analyzes and quantifies the need for parks and recreational facilities in cities and unincorporated areas. PNA+ identifies priority areas for environmental conservation and restoration, forming the basis of the County's strategy to conserve at least 30 percent of lands and waters by 2030 (30x30). It also identifies priority areas for regional recreation and rural recreation using various indicators of population vulnerability and other factors such as access to regional and rural recreation sites via different modes of travel, the availability of such facilities, and the amenities they offer.

### 3.3.6 Active Transportation Strategic Plan

The Los Angeles County Metropolitan Transportation Authority (Metro) adopted the Active Transportation Strategic Plan (ATSP) Update in 2023. The ATSP identifies how the agency plans to help cities encourage more walking and biking in the County. Metro's goal is to make it easier for people to walk and bike to transit stations as well as to help cities fund and build regional walk/bike paths that connect communities.

Metro is working to advance active transportation initiatives and provide more travel options throughout the County. Metro adopted the 2023 ATSP Update, which will further their mission of providing a world-class transportation system and focus specifically on improving the regional active transportation network and

first/last mile connectivity to transit. Relevant existing and proposed initiatives from the ATSP Update have been incorporated in the WSAP to further implement the ATSP Update and meet the WSAP goals of enhancing walkability and integrating land use and mobility throughout its communities.

### 3.3.7 Connect SoCal

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024 as an update to the 2020-2045 RTP/SCS. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050.

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The regional transportation network envisioned in Connect SoCal would reduce per-capita GHG emissions related to vehicular travel associated with the proposed project and assist in meeting the GHG reduction per capita targets for the SCAG region.

## 3.4 PROJECT CHARACTERISTICS

"Project," as defined by the CEQA Guidelines, means:

> ... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)…enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. § 15378[a])

### 3.4.1 Description of the Project

The WSAP (proposed Project) is a community-based plan that focuses on land use and policy issues to address the unique characteristics, needs, and resident objectives for the Planning Area. It is a long-range policy document that will guide long-term growth of the unincorporated communities in the Planning Area through its goals, policies, and implementation actions. The proposed Project would amend the General Plan to establish both areawide and community-specific goals and policies to address local land use concerns and issues. It will also implement Land Use Policy Map and Zoning Ordinance updates based on policies, programs, and action items defined by the recently adopted and State-certified General Plan's 6th Cycle Housing Element 2021-2029 (Housing Element), as well as changes to facilitate additional housing opportunities and ensure consistency between zoning and land use designations.

# 3. Project Description

The WSAP includes the following elements: land use, mobility, conservation and open space, public services and facilities, economic development, and historic preservation. A primary goal of the WSAP is to augment existing County-adopted land use policies to address community needs and prioritize issues that are central to the lives of community members. Overarching goals of the WSAP will aim to revitalize primary commercial corridors and centers, while maintaining the character of existing residential neighborhoods; provide opportunities for the development of affordable housing; concentrate and support mixed-use development in an urban form that reduces vehicle travel and promotes access by walking, bicycling, and transit; improve access to parks and trail connectivity; recognize culturally significant landmarks and amplify community identity; and improve pedestrian and traffic safety.

**General Plan Amendment No. RPPL2023002433.** The General Plan Amendment would incorporate the WSAP as part of the County General Plan. It defines goals and policies for the unincorporated Planning Area communities of Ladera Heights, View Park, and Windsor Hills, and West Fox Hills. The WSAP includes the following:

- Areawide goals and policies with respect to: Land Use, Mobility, Conservation and Open Space, Public Services and Facilities, Historic Preservation, and Economic Development;
- Action-oriented programs implementing the areawide goals and policies;
- Chapters presenting additional locally-defined goals, policies, and implementation programs that are specific to neighborhoods, addressing planning issues unique to these areas that are not addressed through areawide goals, policies, and programs.
- The WSAP would provide for land use changes on identified opportunity sites that would result in increased residential and mixed-use densities totaling 6,757 residential dwelling units, yielding 6,489 households[1] and 244,000 square feet of non-residential use to these communities. Updates to the General Plan Land Use Policy Map would:
  - Incorporate land use designations and densities for sites identified to accommodate the Regional Housing Assessment (RHNA) allocation in the adopted 2021-2029 Housing Element;
  - Incorporate designations to accommodate land uses proposed in developing the WSAP; and
  - Maintain consistency between zoning and land use policy. In addition to the identified Opportunity Sites, the WSAP Land Use Policy Map would modify designations for properties to reflect their current use and/or density where these, and the densities for sites identified by the Housing Element, deviate from those depicted by the current General Plan Policy Map.

**Zone Change No. RPPL2023002450.** The zone change would update the zoning map for the Planning Area to maintain consistency with the Land Use Policy Map and incorporate proposed rezoning identified in the Housing Element to meet the RHNA goals for the County. Table 3-1, *Land Use and Zoning Change Summary*,

[1] Based on the project's proposed densities and intensities, buildout of the WSAP is anticipated to result in up to 6,757 residential dwelling units. However, based on the County's occupancy rate of 96 percent, 6,489 units are anticipated to be populated. Populated residential dwelling units are referred to herein as "households." The 6,489 households were used as the basis for technical analysis in this PEIR, which analyzes the realistic operational conditions of the proposed Project.

identifies the location, existing land use and zoning designations, and the proposed land use and zoning designations for the identified opportunity sites.

**Advanced Planning Case No. RPPL2023002448**. Title 22 (Planning and Zoning) of the County code would establish a Planning Area Standards District specifying development standards applicable to all unincorporated communities in the Planning Area and would include community-specific standards.

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**Table 3-1 Opportunity Sites Land Use and Zoning Change Summary**

| Location ID | Location | Existing Land Use Designation (Designation: Maximum Density, FAR) | Proposed Land Use Designation (Designation: Maximum Density, FAR)[1] | Existing Zoning Designation | Proposed Zoning Designation |
|---|---|---|---|---|---|
| 1 | Centinela-Green Valley (SE) | H9: 9 | H50: 50 | R-1 | R-4 |
| 2 | Ladera Center | CG: 50, 1.0 | MU: 150, 3.0 | C-2 | MXD |
| 3 | Wateridge Business Center | CG: 50, 1.0 | MU: 150, 3.0 | C-3 | MXD |
| 4a | Slauson-Fairfax/Home Depot Center | CG: 50, 1.0 | MU: 150, 3.0 | C-3 | MXD |
| 4b | Slauson-Fairfax Intersection | CG: 50, 1.0 | MU: 150, 3.0 | C-2, C-3 | MXD |
| 5 | Slauson-Heatherdale | CG: 50, 1.0 | MU: 150, 3.0 | C-2 | MXD |
| 6 | Slauson-Overhill North | CG: 50, 1.0 | MU: 150, 3.0 | C-2, R-3-P | MXD |
| 7 | Slauson East | CG: 50, 1.0 | MU: 150, 3.0 | C-2 | MXD |
| 8 | West 54th Street | CG: 50; 1.0 | CG: 50, 1.0 | C-2 | C-2 |
| 9 | Leimert Park Adjacent | CG:50, 1.0 | MU: 150, 3.0 | C-1 | MXD |
| 10 | Angeles Vista-Valley Ridge | H9: 9 | CG: 50, 1.0 | R-1 | C-2 |
| 11 | Inglewood Oil Fields[2] | MR, P | -- | A-2, M-1.5 | -- |
| 12 | West Fox Hills (Del Rey) | CG: 50, 1.0 | MU: 150, 3.0 | C-3 | MXD |

Notes:
Definitions for General Plan Land Use and Zoning designations are provided in Appendix I, *WSAP Opportunity Sites Land Use and Zoning Definitions*.

[1] Proposed densities and intensities listed in this table show the maximum development capacity permitted under the land use plan. For analysis purposes, a review of on-the-ground conditions and market trends informed the development of a "realistic scenario" which reflects development likely to occur during the planning period.

[2] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

#### 3.4.1.1 WESTSIDE PLANNING AREA ELEMENTS

The WSAP would provide a comprehensive vision for the unincorporated communities in the Planning Area and goals, policies, and implementation programs for the following: Land Use Element; Conservation and Open Space Element; Economic Development Element; Mobility Element; Preservation Element; and Public Facilities and Services Element. The six planning elements of the WSAP are summarized below.

### Historic Resources Element

The Historic Preservation Element encourages the identification, documentation, and designation of historic resources in the Planning Area. This includes establishing a comprehensive inventory of historic sites and developing programs to educate property owners on Los Angeles County's historic preservation program. Policies are defined to protect the historic character of neighborhoods and districts by developing guidelines for future infrastructure projects to ensure that new construction is compatible in design, scale, and materials. The Historic Preservation Element also includes goals to increase public awareness of the Planning Area's unique history by collaborating with schools and community organizations.

### Land Use Element

The Land Use Element provides direction for how existing uses in the Planning Area can be maintained and enhanced and new development seamlessly integrated to complement and benefit the existing community and sustain its environmental resources. There are a number of goals and policies specific to the Ladera Heights/View Park-Winsor Hills and West Fox Hills communities. These goals and policies are related to maintaining sustainable and managed growth, promoting a diversity of land uses meeting the needs of these communities, promoting quality residential neighborhoods that are great places to live with active commercial and mixed-use districts, ensuring a sustainable and safe built environment, and fostering a community invested in planning. Implementation actions and programs would be used to carry out the goals and policies identified in the Land Use Element.

Existing land uses as defined in the General Plan are shown in Figure 3-3, *Existing General Plan Land Use Map*. Generally, changes to the Land Use Policy Map and related zoning designations to ensure consistency would permit mixed-use development and higher densities within major commercial corridors and centers and along high-quality transit corridors. These changes would be limited to the Ladera Heights, View Park, and Windsor Hills, and West Fox Hills communities, as shown in Figure 3-4, *Proposed Land Uses*. Additionally, changes to zoning designations for consistency with the updated Land Use Policy Map or current use and/or density would occur and are depicted in Figures 3-5a through 3-5d, *Westside Area Plan Proposed Zoning Changes*.

Community members and planning staff have identified 12 distinct locations, or Opportunity Sites, for mixed-use development and higher densities, as shown in Figure 3-6, *Opportunity Sites* and Table 3-1, *Land Use and Zoning Change Summary*. It should be noted that although the Inglewood Oil Field is identified as an Opportunity Site in Table 3-1, the WSAP defers recommendations for new land uses to future planning studies, which would be conducted through a separate planning process. The existing policies and designations for the Inglewood Oil Field as identified in the BHCSD will be retained with no modifications. However, proposed policies provide direction for a robust program of public discussion and input in developing plans for their future use

and guidance that to provide connections with the existing neighborhoods and districts. Outside of these areas, existing uses, including parks and open spaces, would be maintained.

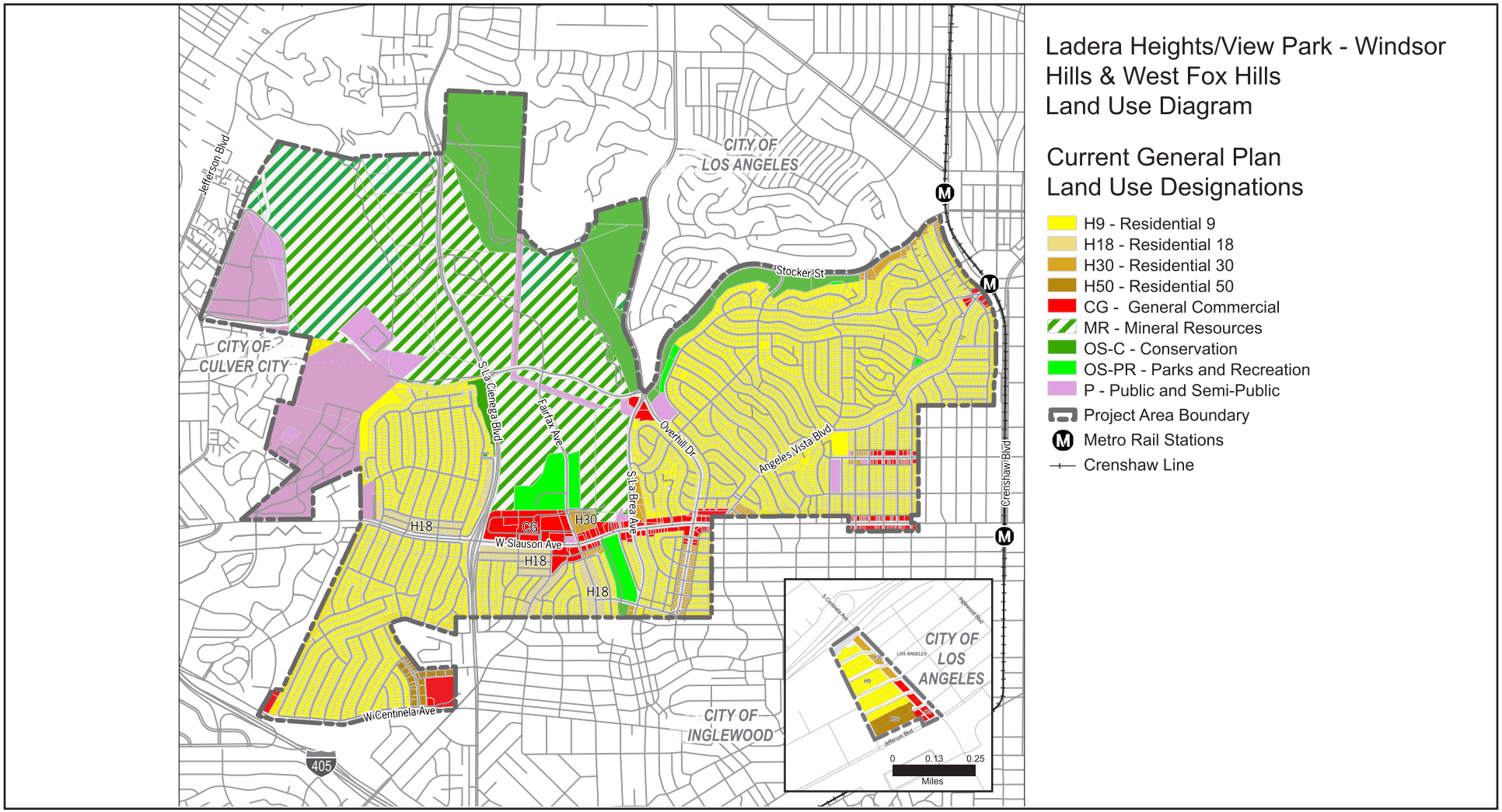
The purpose of these zoning and land use changes would be to enable development of a greater diversity of housing types; economic vitalization of commercial corridors and centers; walkable connected communities with access to transit, parks, trails, and community gathering spaces; and a distinct community identity improving the quality-of-life for the Westside communities.

As a visual reflection of the WSAP's land use goals and policies, proposed land use and zoning changes shown in Figure 3-4 indicate the locations for the types and densities of land use in the unincorporated Westside communities identified for growth. The WSAP does not include proposals for or approvals of any specific projects. However, land use and zoning changes and policies included in the WSAP are intended to encourage and facilitate the development of future projects that could result in environmental impacts. For example, future residential or commercial development near commercial corridors and centers could result in physical environmental impacts during both construction and long-term operation, such as aesthetics/visual impacts, air quality impacts, transportation impacts, impacts to historical resources, etc. These specific future projects would be analyzed in subsequent CEQA environmental analyses, as deemed necessary.

### Mobility Element

The purpose of the Mobility Element is to provide more efficient and safe access to the multimodal transportation network within the Planning Area. The Mobility Element outlines a strategy to improve mobility in a sustainable, equitable, and achievable way. Goals and policies are area-wide and community specific. Area-wide policies include partnering with the Los Angeles County Sheriff's Department to help ensure thorough traffic collision data is being collected as well as implementing safety countermeasures along identified collision concentration corridors. Metro has a large network of transportation services throughout Los Angeles County. Implementation of policies that focus on partnering and working with Metro and other surrounding transit agencies would ensure reliable and safe transit services in the Planning Area, along with promoting and encouraging the use of rideshare services. Another focus point of the Mobility Element is to design pedestrian infrastructure that aligns with federal, state, and local design guidelines and accessibility standards to account for all users.

## Figure 3-3 - Existing General Plan Land Use Map




*Source: County of Los Angeles 2023; PlaceWorks 2024.*

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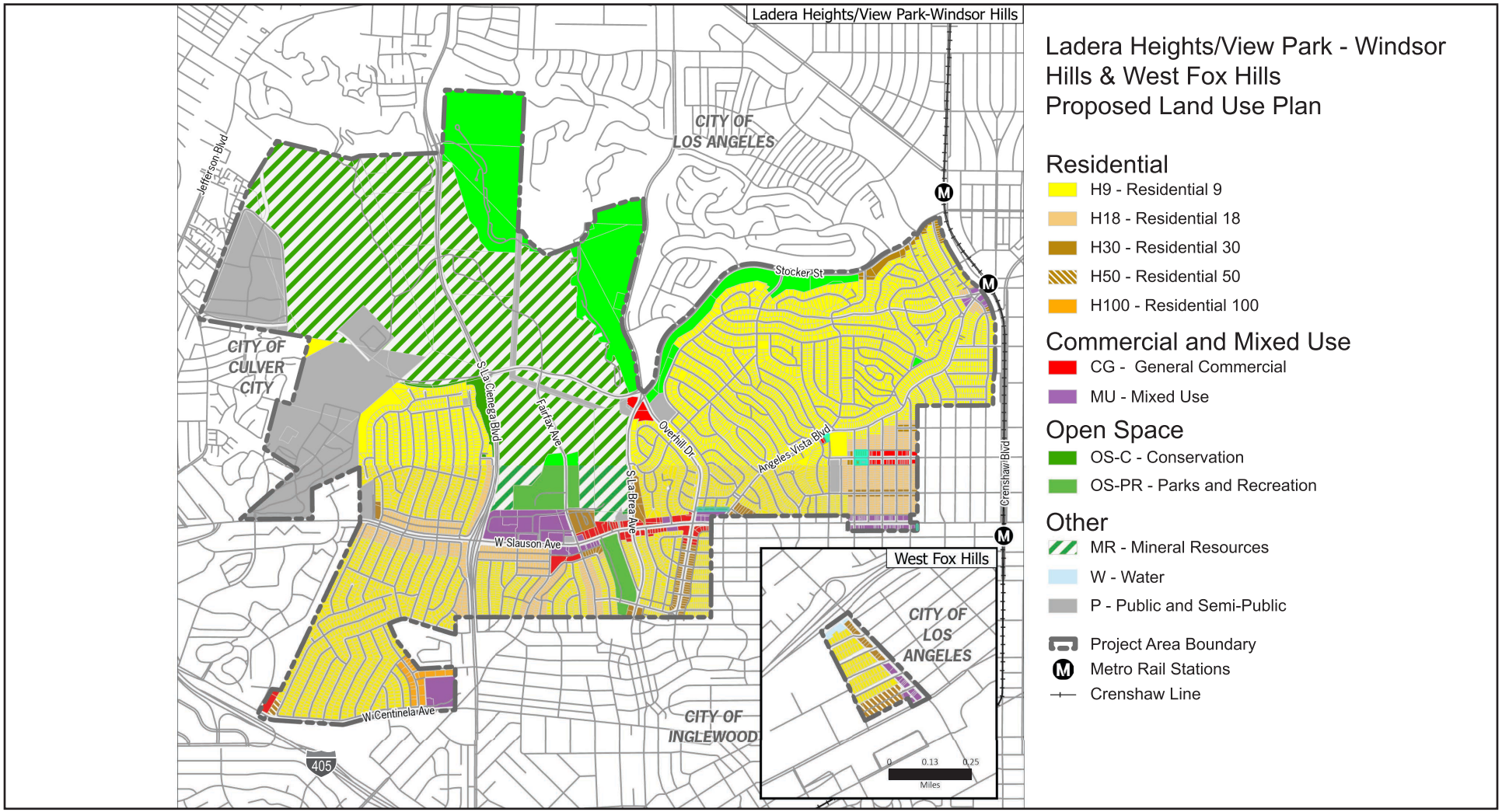
## Figure 3-4 - Proposed Land Use Map




*Source: County of Los Angeles 2023; PlaceWorks 2024.*

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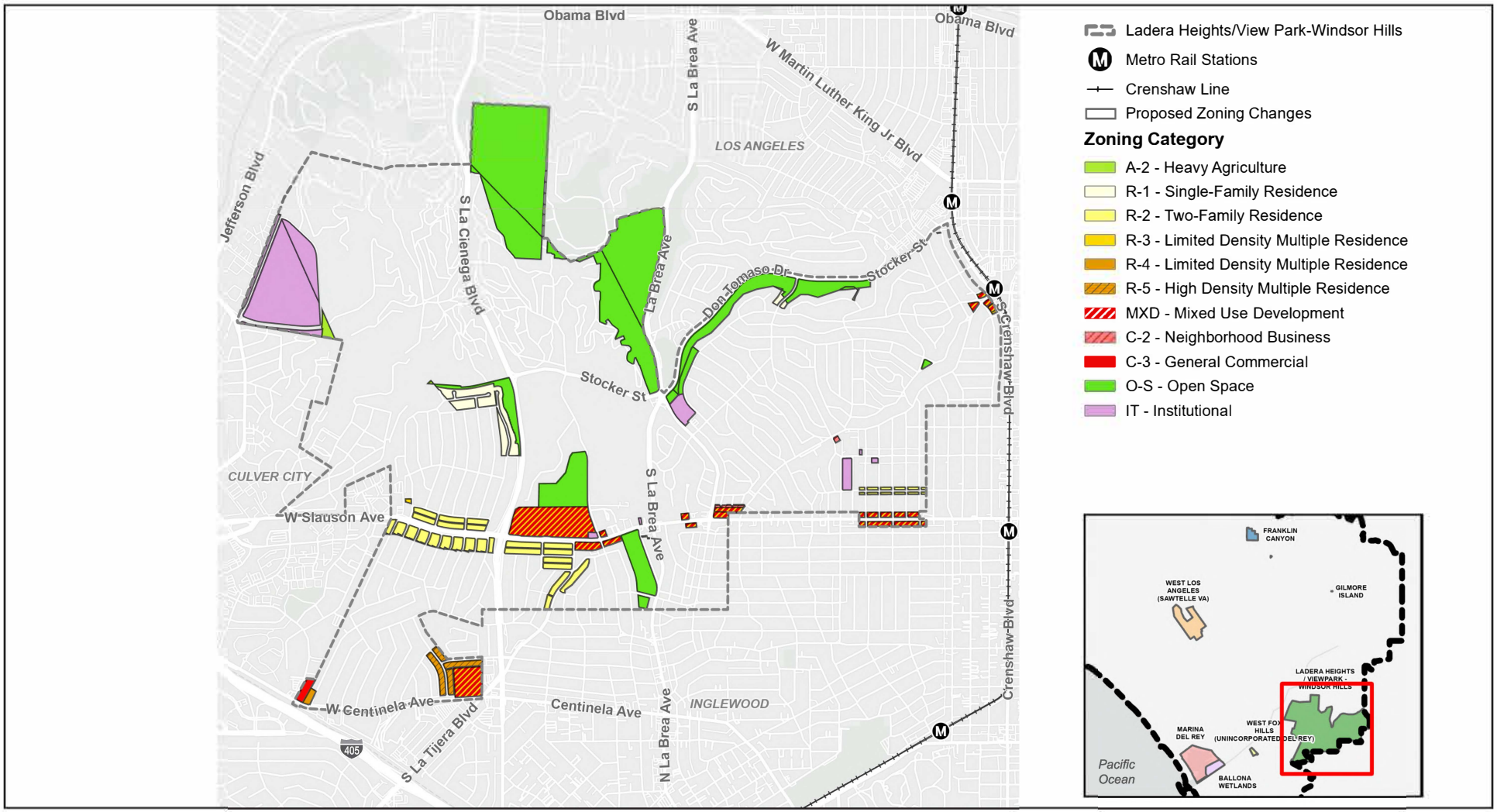
# Figure 3-5a - Westside Area Plan Proposed Zoning Changes, Ladera Heights/View Park-Windsor Hills




*Source: LA County Planning 2024.*

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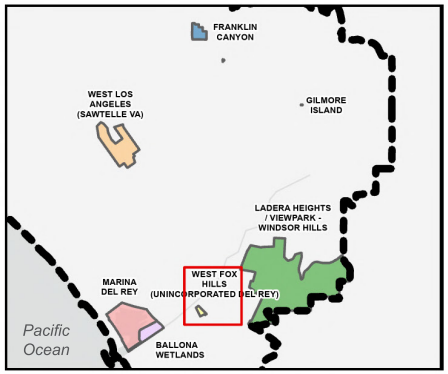
# Figure 3-5b - Westside Area Plan Proposed Zoning Changes, West Fox HIlls (Unincorporated Del Rey)


West Fox Hills (Unincorporated Del Rey)
Proposed Zoning Changes

**Zoning Category**

MXD - Mixed Use Development
O-S - Open Space




0 400
Scale (Feet)

*Source: LA County Planning 2024.*

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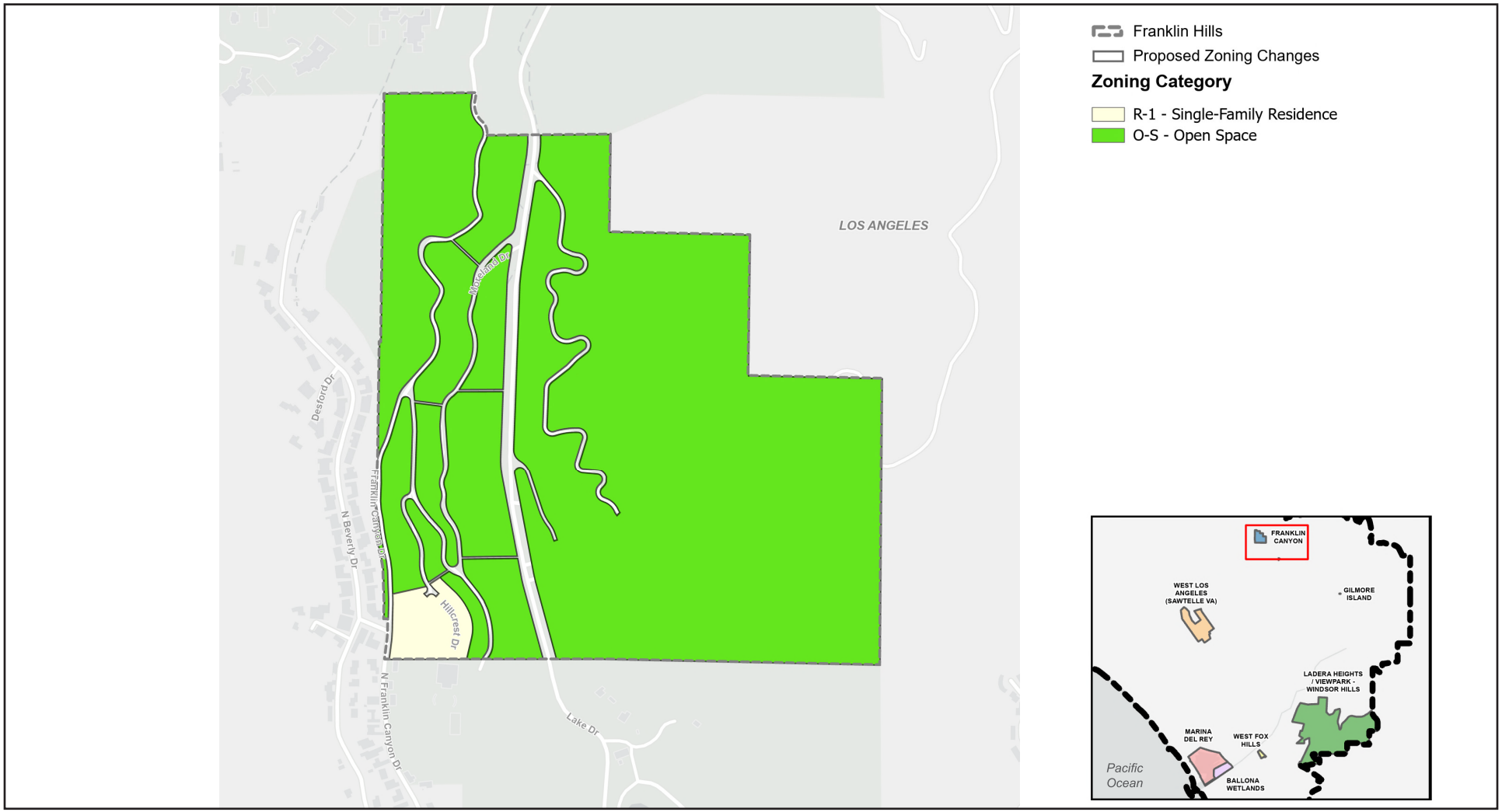
## Figure 3-5c - Westside Area Plan Proposed Zoning Changes, Franklin Hills




Source: LA County Planning 2024.

# 3. Project Description

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## Figure 3-5d - Westside Area Plan Proposed Zoning Changes, Ballona Wetlands


Source: LA County Planning 2024.

# 3. Project Description

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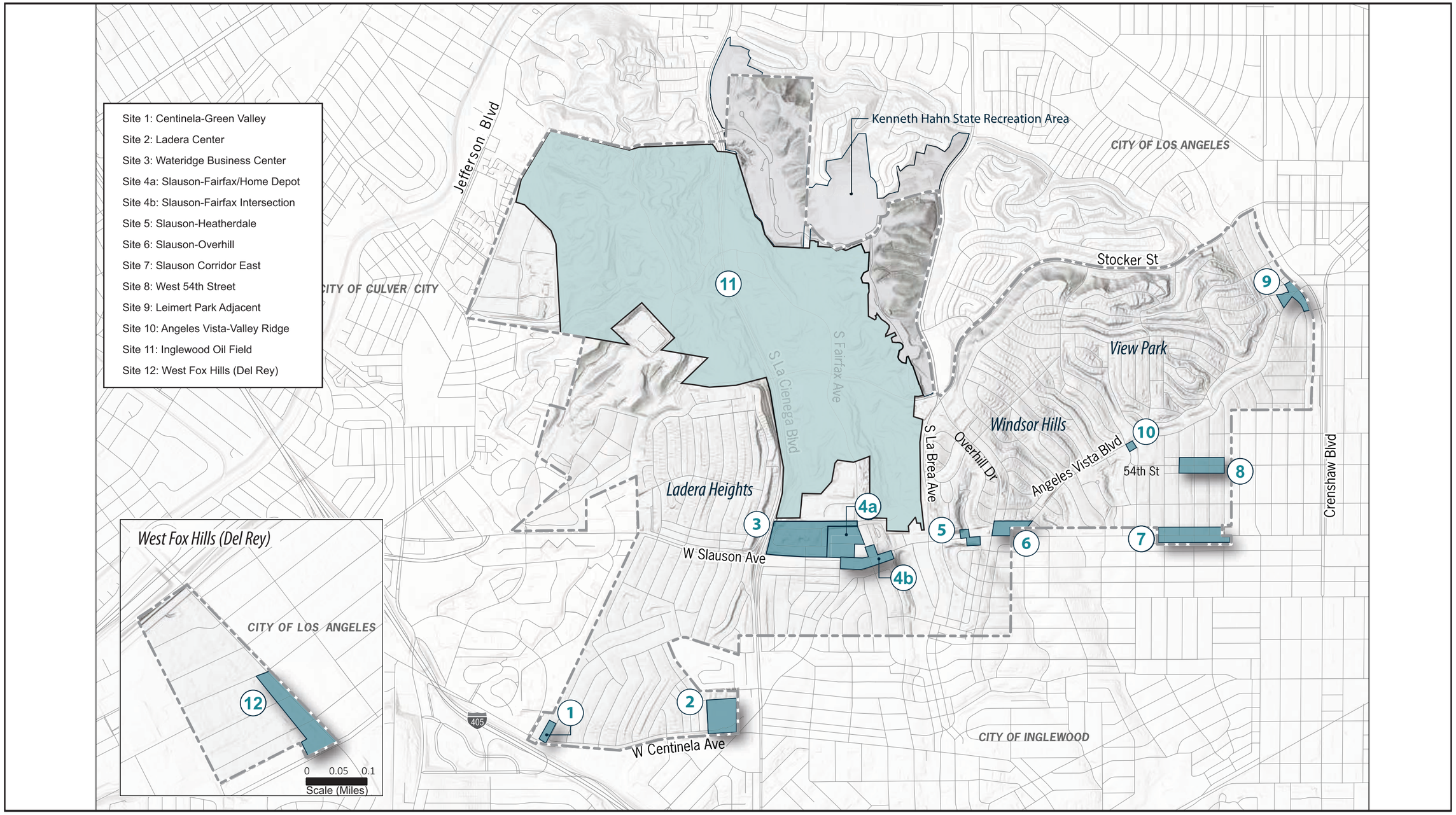
## Figure 3-6 - Opportunity Sites Map




*Source: County of Los Angeles 2024; PlaceWorks 2024.*

# 3. Project Description

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## Economic Development Element

The Economic Development Element provides a framework to support the County's goals for the Planning Area by attracting investment, developing a resilient workforce, reducing economic and financial distress in vulnerable communities, and providing for an economically and fiscally sustainable region. The Economic Development Element includes goals and policies to increase workforce development, increase access to education and economic resources, and invest resources that prioritize disadvantaged communities. One goal is developing a Community Benefits Program that would be comprised of specific commitments from future developers, and its purpose would be to support community needs and provide desired benefits in exchange for development rights. Policies are included that ensure seniors receive economic support to prevent displacement. Another goal is to provide equitable access to good jobs in growing industries as well as prioritize spaces for small business and preserving the community's Black legacy businesses. Implementation of these goals and policies are intended to facilitate the development of new industries and businesses in the Planning Area as well as preserve longstanding businesses within the communities.

## Conservation and Open Space Element

A guiding principle of the WSAP is to protect open spaces and natural resources while emphasizing sustainable building practices and implementing infrastructure improvements that are environmentally sensitive and minimize impacts on energy, water, air, and climate. The Conservation and Open Space Element provides Planning Area-wide and community specific goals and policies to conserve open space, biological resources, natural resources, and scenic resources. The Planning Area contains unique natural resources and open spaces including the Ballona Wetlands (a County-established Significant Ecological Area or SEA), Kenneth Hahn State Recreation Area, and the Inglewood Oil Field. The Conservation and Open Space Element contains goals and policies that guide the County's efforts to protect, conserve, and enhance existing biological and natural resources. It includes policy direction for the development of hillsides that protects scenic vistas and outlines a future planning process to guide the evolution of the Inglewood Oil Field. The element also sets the policy framework for achieving the overall vision for the Planning Area to protect and conserve natural resources and open spaces. This element also addresses infrastructure resilience in the face of climate change, such as water conserving measures, installation of electric vehicle (EV) charging station locations, and coordination with local partners regarding sustainable best practices.

## Public Facilities and Services Element

Parks, trails, recreation facilities and programs, and public services nurture the social, physical, and mental well-being of residents of the Planning Area. The Public Facilities and Services Element supports a vision of expanded access to parks and trails, enhanced recreation activities, and robust community facilities and programs that continue to support the healthy lifestyles of the Planning Area's current and future residents. Parks and recreational facilities will contribute to individual health by supporting physical activity and access to the mentally restorative powers of nature. Public facilities and community services such as libraries, schools, and arts and cultural programs will enrich the mind and connect neighbors with each other. The Public Facilities and Services Element defines the goals and policies that respond to the unique needs of the Westside

communities for public facilities and services that allow residents in intergenerational neighborhoods to thrive and improve the area's resiliency to climate change impacts.

This element advances the Planning Area's vision to promote healthy neighborhoods where residents have great places to recreate and gather. It builds upon the policy direction for essential services, facilities, and infrastructure established by the Public Services and Facilities Element and Parks and Recreation Element of the General Plan.

## 3.5 REQUIRED APPROVALS: ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS

CEQA Guidelines Section 15124(d) requires an EIR to contain a statement briefly describing the intended uses of the EIR. Los Angeles County has approval authority over the WSAP. Approval from other public agencies is not required. The County would certify the Final EIR, approve the General Plan Amendment, and adopt the WSAP. No other agency approvals would be required, as these are policy matters for the County. Some of the actions in the WSAP's implementation program may involve other agencies, such as SCAG concerning expanded transit service; however, such actions would require future project-level CEQA evaluation by the organization undertaking such an action, at which time that organization would be the lead or approving agency. Any future development projects are subject to their own environmental and processing requirements.

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# 4. Environmental Setting

## 4.1 INTRODUCTION

This section provides a "description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective" pursuant to provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines Section 15125[a]). The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from the proposed project.

Located in County of Los Angeles (County), the Westside Planning Area (Planning Area) includes unincorporated communities that offer a diversity of residents, geographies, and community needs that need to be adequately and appropriately planned for. The Westside Area Plan (WSAP) includes goals and policies that address topics such as sustainable development, equity mobility options aside from single-occupancy vehicles, and recognition of community identity and culture.

This environmental setting chapter describes existing development patterns and land uses in the Planning Area to characterize baseline conditions. Within this Chapter, Section 4.2, *Regional Environmental Setting*, describes the regional location and population and demographics of the Planning Area. Section 4.2.3, *Regional Land Use Issues*, provides a high-level synopsis of land use issues and challenges in the Planning Area based in part on the existing conditions analysis and input received by stakeholder and community members as part of the WSAP preparation process. Many of these issues are not unique to the Planning Area and are found in suburban communities throughout California and the United States.

Section 4.3, *Local Environmental Setting*, discusses and characterizes the unincorporated communities in the Planning Area, describing the communities' size, population, population density, predominant land uses, and other features. Figure 3-3, *Existing General Plan Land Use Map*, shows the existing 2035 Los Angeles County General Plan (General Plan) land uses and Figures 3-4, *Proposed Land Use Map* and 3-5, *Opportunity Sites*, depict proposed land use designations and 12 opportunity areas where land use/zoning changes would occur. Recommendations from precedent planning studies and regional guidance point to the need to target growth toward existing and proposed transit and active transportation investments and to diversify land uses to support residential needs and access to daily goods within walking distance. At the same time, growth is discouraged within hazard areas, such as in high fire hazard zones, as well as in ecologically sensitive areas, not only to protect residents and biodiversity, but also to preserve the environment and open space areas.

Section 4.4, *Regional Planning Considerations*, discusses the policy framework of the General Plan and identifies the General Plan's Guiding Principles. This section describes the existing General Plan land use and zoning designations in the Planning Area. Across the County, land use and design preferences are shifting, living costs are increasing, and development pressures are rising. A key element of the WSAP planning process involves

developing land use goals and policies, as well as reviewing land use designations, regulations, and community design requirements to respond to these pressures and improve overall well-being for community members.

# 4.2 REGIONAL ENVIRONMENTAL SETTING

## 4.2.1 Regional Location

The Westside Planning Area is one of 11 planning areas identified in the General Plan and is located in the western portions of Los Angeles County. The Planning Area is located north of Inglewood, West of East Los Angeles, and east of the Pacific Ocean. The Planning Area includes the following unincorporated communities: Ladera Heights, View Park, and Windsor Hills; Marina del Rey; Ballona Wetlands; and Westside Islands, which includes West Los Angeles (Sawtelle Veterans Affairs [VA]), West Fox Hills, Franklin Canyon, and Gilmore Island. These communities are identified in Figure 3-2, *Project Location*. Marina del Rey, Ballona Wetlands, and West Los Angeles (Sawtelle VA) are governed by separate planning processes and are not anticipated to change. The Westside Area Plan will focus primarily on Ladera Heights, View Park and Windsor Hills, and West Fox Hills.

Pacific Coast Highway forms the western boundary of the Planning Area. Interstate 405 (I-405) runs through the center of the Planning Area from north to south and Intersate-10 (I-10) runs through the center from west to east. The Santa Monica Mountains form the northern boundary of the Planning Area. See Figure 3-1, *Regional Location Map*.

The Planning Area includes regional recreational areas including Kenneth Hahn State Recreation Area located to the east of La Cienega Boulevard and west of La Brea Avenue. The approximately 639 acre Inglewood Oil Field is also within the Planning Area and is located in Baldwin Hills adjacent to Kenneth Hahn State Recreation Area. Los Angeles International Airport (LAX) is located approximately four miles south of Marina del Rey. The Metro Light Rail Lines E and K serve the Planning Area.

## 4.2.2 Population and Demographics

Demographic information in this section is derived from data found in the WSAP Community Background Report and Land Use Background Report. As of 2021, the Planning Area, inclusive of all unincorporated communities within it, is home to 32,712 people and is comprised of 15,425 households (Los Angeles County 2021). Many households within the Planning Area are more affluent than the County average, with median household incomes of $126,729, compared to the County's $76,367. With respect to education, many members (65 percent) have a bachelor's, graduate, or professional degree, with another 22 percent receiving some college education.

The unincorporated community of Ladera Heights has a population of 6,500 residents, which is comprised primarily of Black identifying residents (71 percent) (Los Angeles County 2021). The median household income in Ladera Heights is $113,462, which is greater than that of Los Angeles County ($76,367). Most have attained higher education (60 percent), with another 27 percent having some college education. Residents primarily work in the service industry (46 percent), finance, insurance and real estate (24 percent), and retail trade (19 percent). The majority of Ladera Heights residents are homeowners (67.2 percent). Most homes in Ladera Heights are

single family or duplex residences, although several hundred residents live in large apartment buildings adjacent to Ladera Center in the southernmost section of the community, known as Lower Ladera.

The unincorporated area of View Park-Windsor Hills is located immediately east of Ladera Heights. Similar to Ladera Heights, View Park-Windsor Hills are predominately Black and have household incomes averaging $101,448. Also similar to Ladera Heights, most have attained higher education with 58 percent of residents having college or professional degree and 27 percent have some college education. Most residents are homeowners in the community (71.7 percent). Many residents work in similar industries as their Ladera Heights neighbors: service industry (55 percent), retail trade (21 percent), and finance, insurance, and real estate (8 percent). Residents in View Park-Windsor Hills are slightly younger than those in Ladera Heights; however, seniors over 64 years old still represent more than a quarter (26 percent) of the overall population. Most residents in View Park and Windsor Hills live in single family homes or small apartment complexes.

The West Fox Hills neighborhood has 456 residents in 219 households. The majority are renter-occupied households (83.6 percent). Median household incomes are $80,564. The two most common employment industries are service (68 percent) and finance, insurance, and real estate (23 percent). Over 97 percent of the residents have a bachelor, graduate, or professional degree or some college education. It is a racially and ethnically diverse neighborhood; 50 percent of the population identify as White, while Asians and Hispanic/Latino residents represent 25 percent and 19 percent of all community members.

Marina del Rey is home to 9,355 people, most of whom identify as White (77 percent). The median household income is $133,038. The vast majority of residents are renters (90.5 percent), with only 9.5 percent homeowners. The top three employment sectors for residents include service (54 percent), retail trade (24 percent), and finance, insurance, and real estate (11 percent). The median age for residents is 43.2 and almost 20 percent of the population are seniors over 64 years old. Residents of Marina del Rey are also highly educated; 15 percent of residents have some college attainment, while 76 percent have a bachelor, graduate, or other professional degree.

Over 1,000 military veterans temporarily or permanently reside in West Los Angeles (Sawtelle Veterans Affairs) community. They are all renters with a median household income of $21,354. Residents identify as mainly White (47 percent), Black (28 percent), and Hispanic/Latino (23 percent). They are mostly employed in the service industry (52 percent) and government (43.0 percent). Approximately half (47 percent) do not have a high school diploma or are high school graduates.

The unincorporated communities of Franklin Canyon and Gilmore Island currently have no permanent residents that reside within these areas. The majority of Franklin Canyon is a part of the Franklin Canyon Park, a 605-acre park managed by the Mountains Recreation and Conservation Authority. Gilmore Island is a small unincorporated parcel of land in the Fairfax neighborhood, it is currently occupied by a parking lot in the CBS Studio complex and has no permanent residents.

### 4.2.3 Regional Land Use Issues

Key issues in the Planning Area stem from the predominately single-family land use pattern, which offers few alternatives for housing to fulfill the needs of the demographically and ethnically diverse resident population,

and few locations to place amenities and services close to neighborhoods to achieve walkable communities. As such, the prevalent issues derived from having few housing options and lack of land use diversity include lack of housing affordability, overcrowding, traffic congestion, and air quality issues. The Ladera Heights, View Park, and Windsor Hills communities experience heavy traffic congestion along commercial corridors. The communities are largely built-out with little remaining vacant land available for development. Any new uses or services would require intensification, redevelopment, or redesignation. In several areas, the maximum density allowed under current General Plan is lower than densities indicated in new zoning designations established in the Housing Element.

The area occupied by the current Inglewood Oil Field represents the largest single redevelopment opportunity that would meet community desires for more amenities and services, and as such, it has been identified as an Opportunity Site. However, the WSAP defers recommendations for new land uses to future planning studies, which would be conducted through a separate planning process. The existing policies and designations for the Inglewood Oil Field as identified in the BHCSD will be retained with no modifications.

# 4.3 LOCAL ENVIRONMENTAL SETTING

The Planning Area includes the unincorporated communities of Ladera Heights, View Park, and Windsor Hills; Marina del Rey; Ballona Wetlands; and Westside Islands. These communities are shown on Figure 3-2, *Project Location Map* and are described below.

## 4.3.1 Ladera Heights, View Park, and Windsor Hills

The communities of Ladera Heights, View Park, and Windsor Hills are bounded to the south by the City of Inglewood and Interstate (I-) 405, to the east by Crenshaw Boulevard, to the north by the Cities of Culver City and Baldwin Hills and to the west by I-405, Jefferson Boulevard, and Ballona Creek. The communities make up a total of 4.8 square miles. These communities consist mostly of residential and commercial land uses with approximately 212 acres designated to the Kenneth Hahn State Recreation Area that is located in the northern portion of the area. The Inglewood Oil Field is also found within the Planning Area. The area is characterized by a mix of large parcels supporting regional and local-serving retail services and offices with a major commercial center at the intersection of Overhill Drive.

### *Opportunity Sites*

As discussed in Chapter 3, *Project Description*, of this Draft PEIR, Opportunity Sites within the Planning Area have been identified that would undergo land use and zoning changes to allow for mixed-use development and higher residential densities. The Opportunity Sites within the Ladera Heights, View Park, and Windsor Hills communities are shown in Figure 3-5, *Opportunity Sites Map*, and are described below.

- **Site 1 (Centinela-Green Valley)** rectangular in shape and is located north of Centinela Avenue and west of Wooster Avenue. Site 1 is developed with a church use (University Christian Church) and surface parking lot. Single-family residences are located north and east and a self-storage facility is located west of Site 1.

- **Site 2 (Ladera Center)** square in shape and is located north of Centinela Avenue and west of La Tijera Boulevard. Site 2 is developed with commercial uses and is part of an existing commercial center consisting of several commercial buildings and surface parking lot. Multi-family residential development are located north and west and a grocery store with associated parking lot is east of Site 2.

- **Site 3 (Wateridge Business Center)** is rectangularly shaped and is located north of Slauson Avenue and east of La Cienega Boulevard. Site 3 is developed with an office center consisting of three office buildings, two surface parking lots, and one parking structure. Single-family residences are located south on the opposite side of Slauson Avenue and a government office building is located north of Site 3.

- **Site 4a (Slauson-Fairfax/Home Depot)** is square in shape and is located north of Slauson Avenue and west of Fairfax Avenue. Site 4a is developed with a commercial center consisting of four commercial buildings and surface parking lots. A commercial building is located north; multi-family residential development is located east; multi-family residential development and a church is located south; and a business center is located west of Site 4a.

- **Site 4b (Slauson-Fairfax Intersection)** is irregularly shaped and consists of several non-contiguous parcels along Slauson Avenue. Site 4b is developed with commercial uses setback from Slauson Avenue and surface parking lots. A shopping center and multi-family residential development is located north; a park and multi-family residential development is located east; a church and multi-family residential development is located south; and multi-family residential development is located west of Site 4.

- **Site 5 (Slauson-Heatherdale)** consists of two rectangularly shaped non-contiguous parcels along Slauson Avenue. The northern parcel of Site 5 consists of a hotel and surface parking lot and the southern parcel of Site 5 consists of a vacant parcel with a small structure on the north side. Single-family residences are located north and south and commercial uses are located east and west of Site 5.

- **Site 6 (Slauson-Overhill)** is irregularly shaped and is located north of Slauson Avenue and east of Overhill Drive. Site 6 is developed with commercial uses and surface parking lot. Single-family residences are located north; commercial and multi-family residential development is located east; commercial uses are located south and west of Site 6.

- **Site 7 (Slauson Corridor East)** is rectangular in shape and consists of several non-contiguous parcels along Slauson Avenue, between Keniston Avenue and Deane Avenue. Site 7 is developed with commercial uses. Single-family residences are located north and south and commercial uses and single-family residences are located east and west of Site 7.

- **Site 8 (West 54th Street)** is rectangular in shape and consists of several non-contiguous parcels along West 54th Street, between Keniston Avenue and Deane Avenue. Site 8 is developed with interspersed multi-family residential development, commercial uses, public facility (library), and churches. Single-family residences are located north and south; single-family residences and a church are located east; and single-family residences and public facility (fire station) are located west of Site 8.

- **Site 9 (Leimert Park Adjacent)** is irregularly shaped and consists of several non-contiguous parcels west of Crenshaw Boulevard, east of Angeles Vista Boulevard, south of Homeland Drive, and north of Brynhurst Avenue. Site 9 is developed with commercial uses and surface parking lots. Single-family residences, multi-family residential development, and commercial uses are located north; Crenshaw Boulevard, commercial uses, and a park are located east; single-family residences are located south and west of Site 9.

- **Site 10 (Angeles Vista-Valley Ridge)** is rectangular in shape and is at the southeast corner of the intersection for Valley Ridge Avenue and Angeles Vista Boulevard. Site 10 is a developed property adjoining a commercial use (Wayfinder Family Services). Single-family residences are located north, south, and west and a commercial use (Wayfinder Family Servives) is located east of Site 10.

- **Site 11 (Inglewood Oil Field)** is irregularly shaped and is within the Baldwin Hills. Site 11 is an active oil field with pumps, tanks, ancillary equipment, energy infrastructure, access roads and other facilities. Site 11 is hilly and is characterized as disturbed natural environment with isolated/fragmented pockets of native and invasive habitats. Residential neighborhoods surround the field and adjoins Kenneth Hahn State Recreation Area.

### 4.3.2 Marina del Rey

Marina del Rey is a coastal community that neighbors Ballona Creek and is located north of Playa del Rey and southeast of Venice. Marina del Rey is the largest man-made small boat harbor in the country. The main Marina del Rey harbor channel to the south, Fiji Way to the east, and the west side of Via Marina to the west. Access to this maritime community is primarily via Washington Boulevard or Lincoln Boulevard, but Marina del Rey is also located at the terminus of the Marina Freeway (SR 90). The area is designated a Coastal Zone and thus, governed by the California Coastal Commission. No changes to this community are anticipated under the WSAP.

### 4.3.3 Ballona Wetlands

The Ballona Wetlands is a coastal ecological area located south of Marina del Rey, north of Playa Del Rey and west and northwest of Playa Vista. The Ballona Wetlands is a roughly rectangular area southeast of Marina del Rey and at the western end of the larger Ballona Creek Wetlands/Playa Vista area. It is undeveloped, and access is primarily via Lincoln Boulevard, Culver Boulevard, and the Pacific Coast Highway. The Ballona Wetlands are officially designated a Significant Ecological Area (SEA) within Los Angeles County. The wetlands are an essential habitat for endangered or threatened plant or animal species. No changes to this community are anticipated under the WSAP.

### 4.3.4 Westside Islands: West Los Angeles, West Fox Hills, Franklin Canyon and, Gilmore Island

The Westside Islands are spread throughout the Planning Area. Unincorporated West Los Angeles is located east of Santa Monica, north of Mar Vista and Culver City, west of Beverly Hills and south of Westwood and

Brentwood. Sawtelle VA consists of primarily residential and commercial uses and is a transit center for the extension of the Metro Purple Line. Commercial uses can be found primarily along Sawtelle Boulevard. I-405 runs north to south through the center of the Sawtelle VA. Interstate 10 (I-10) forms the southern border of the area. State Route 2 runs east to west through the center of the community. No changes to this community are anticipated under the WSAP.

West Fox Hills consists of an unincorporated residential and commercial island within Culver City with a total area of 31.1 acres. The area is located southwest of Ladera Heights, Park View, Windsor Hills area and northeast of Ballona Wetlands. It is bordered by the Centinela Creek Channel to the north, South Centinela Avenue to the northeast, West Jefferson Boulevard to the south, and Grosvenor Boulevard to the west.

Franklin Canyon is an open space area mostly used as parkland and trails and lies between the San Fernando Valley and Beverly Hills. This area is owned by the United States National Park Service (NPS) and operated by the Mountains Recreation and Conservation Authority (MRCA). No changes to this community are anticipated under the WSAP.

Gilmore Island is located south of West Hollywood and north of Downtown Los Angeles. No residents reside in this area as the area is currently used as a parking lot on the CBS Studio complex. No changes to this community are anticipated under the WSAP.

#### *Opportunity Site*

One Opportunity Site has been identified within the West Fox Hills community, as shown in Figure 3-5, *Opportunity Sites Map*, and described below.

- **Site 12 (West Fox Hills [Del Rey])** is rectangular in shape and consists of several non-contiguous parcels along Centinela Avenue, between Jefferson Boulevard and Lucile Street. Site 12 is developed with commercial uses and single-family residences. Single-family residences are located north; multi-family residential development are located south; a church and public facility (Playa del Rey Elementary School) are located east; and single family residences, multi-family residential development, and a commercial use are located west of Site 12.

## 4.4 REGIONAL PLANNING CONSIDERATIONS

### 4.4.1 State

#### California Government Code

#### *State Planning Law*

State planning law (California Government Code Section 65300) requires every county or city in California to adopt a comprehensive, long-term general plan for physical development of the county. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a countywide vision. State law requires that a general plan address nine elements or topics (land use, circulation, housing, conservation, open space, noise, safety, climate adaptation and

resiliency, and environmental justice), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the county or city that a general plan should address. In Los Angeles County, the General Plan serves as the foundation for all community-based plans, including Area Plans, for the unincorporated communities which focus on land use and other policy issues that are specific to the Planning Areas. The Planning Areas Framework Program (Program LU-1) of the General Plan requires the completion of an Area Plan for each of the County's 11 Planning Areas (e.g., the Westside Area Plan).

### *Section 65580- Housing Element Law*

Housing Element law is the main vehicle through which the State affects local housing and land use policies. The law does not require local governments to actually build the housing, but the adopted Housing Element must provide an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element must identify adequate sites for housing and make adequate provision for the existing and projected needs of all economic segments of the community. The County of Los Angeles' Housing Element must be updated every four years and must be reviewed by the California Department of Housing and Community Development (HCD) before it is adopted. The Los Angeles County Board of Supervisors adopted the 6th Cycle 2021-2029 Housing Element in May 17, 2022, and certified the EIR.

### *Climate Change Scoping Plan*

The California Air Resources Board (CARB) is charged with protecting the public from the harmful effects of mobile source air pollution and developing programs and actions to fight climate change. CARB is required to prepare a "scoping plan" for achieving the maximum technologically feasible and cost-effective GHG emission reductions (Health and Safety Code Section 38561[a]), and to update the Scoping Plan at least once every 5 years. CARB adopted the 2022 Scoping Plan Update in December 2022. The 2022 Scoping Plan outlines the state's plan to reach carbon neutrality by 2045 or earlier, while also assessing the progress the state is making toward achieving GHG reduction goals by 2030. Per the Legislative Analyst's Office, the 2022 Scoping Plan identifies a more aggressive 2030 GHG goal. As it relates to the 2030 goal, perhaps the most significant change in the 2022 plan (as compared to previous Scoping Plans) is that it identifies a new GHG target of 48 percent below the 1990 level, compared to the current statutory goal of 40 percent below. Current law requires the state to reduce GHG emissions by at least 40 percent below the 1990 level by 2030 but does not specify an alternative goal. According to CARB, a focus on the lower target is needed to put the state on a path to meeting the newly established 2045 goal, consistent with the overall path to 2045 carbon neutrality. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired

electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

The 2022 Scoping Plan Update also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon. Strategies for carbon removal and sequestration include carbon capture and storage from anthropogenic point sources, where $CO_2$ is captured as it leaves a facility's smokestack and is injected into geologic formations or used in industrial materials (e.g., concrete); and carbon dioxide removal from ambient air, through mechanical (e.g., direct air capture with sequestration) or nature-based (e.g., management of natural and working lands) applications.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and the Executive Orders it also establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered to not conflict with the statutes and Executive Orders if it would meet the general policies in reducing GHG emissions to facilitate the achievement of the state's goals and would not impede attainment of those goals.

## 4.4.2 Regional

### Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a federally recognized Metropolitan Planning Organization (MPO) that represents the counties of Los Angeles, Orange, Ventura, Imperial, San Bernardino, and Riverside, and 190 cities, and encompasses over 38,000 square miles (SCAG 2024). SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and State law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District (SCAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents (SCAG 2024).

#### *Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)*

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The regional transportation network envisioned in Connect SoCal would reduce per-capita GHG emissions related to vehicular travel associated with the proposed project and assist in meeting the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, proposed projects, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The purpose of the 2024–2050 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2024–2050 RTP/SCS, certified on May 7, 2020, states that "[e]ach [metropolitan planning organization] is required to prepare an SCS as part of their RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375" (SCAG 2024). The 2024–2050 RTP/SCS seeks improved mobility and accessibility, which is defined as "the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices" (SCAG 2024) The 2024–2050 RTP/SCS seeks to implement a strategy that "alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation" (SCAG 2024). Furthermore, the 2024–2050 RTP/SCS includes "more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth" and "accommodate increases in population, households, employment, and travel demand" (SCAG 2024). Moreover, the 2024–2050 RTP/SCS states that while "[t]ransportation emissions are most prevalent relative to all other sectors in California and specifically in the SCAG region," the RTP/SCS would focus "growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions" (SCAG 2024).

## South Coast Air Quality Management District (SCAQMD)

### *South Coast Air Basin*

The Planning Area is located within the South Coast Air Basin (SoCAB). The SoCAB is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east (SCAQMD 2017). The SoCAB's air pollution problems are a consequence of the combination of emissions from the nation's second-largest urban area, meteorological conditions that hinder dispersion of those emissions, and mountainous terrain surrounding the SoCAB that traps pollutants as they are pushed inland with the sea breeze (SCAQMD 2017). The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, State, and local air pollution control regulations in the SoCAB. The SCAQMD operates monitoring stations in the SoCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain State and federal ambient air quality standards in the SoCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

### *Air Quality Management Plan*

SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain the California Ambient Air Quality Standards and National Ambient Air Quality Standards in the SoCAB. SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment. The 2022 AQMP was adopted on December 2, 2022, and was developed to address the 2015 national ozone standard. The 2022 AQMP provides the regional path towards improving air quality and meeting federal standards for air pollutants. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 federal ozone standard (SCAQMD 2022).

## 4.4.3 Local

### General Plan Land Use and Zoning

The General Plan was adopted by the County on October 6, 2015. The General Plan provides a policy framework for how and where the unincorporated areas would grow through the year 2035. The General Plan also establishes goals, policies, and programs to foster healthy, livable, and sustainable communities.

The General Plan discusses new housing and jobs within the unincorporated County areas in anticipation of population growth in the County and the region. The County established Guiding Principles in the General Plan to emphasize the concept of sustainability. These Guiding Principles include:

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

2. **Ensure community services and infrastructure are sufficient to accommodate growth:** Coordinate an equitable sharing of public and private costs associated with providing or upgrading 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. **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 measurable effect on public well-being.

# 4. Environmental Setting

### *Los Angeles County General Plan and Planning Areas Framework Program*

The Los Angeles County 2035 General Plan, adopted on October 6, 2015, provides goals and policies to achieve Countywide planning objectives for the unincorporated areas and serves as the foundation for all community-based plans, including the Project. The Planning Areas Framework Program of the General Plan (LU-1) requires completion of an area plan for each of the 11 County Planning Areas. In addition to establishing universal guidelines, the Planning Area Framework Program directs lead agencies to design and implement area plans which address land use and policy issues that are specific to the given Planning Area. The General Plan, together with community-based plans, also establish land use categories (or "designations") to provide a framework for the basic type and intensity of uses permitted each land use category, including the overall maximum density for residential development and maximum intensity of development for commercial and industrial uses.

### *General Plan Land Use*

The character of the individual unincorporated communities within the Planning Area varies widely, but they share a similar development pattern consisting of segregated and largely homogenous land uses that offer few alternatives to driving between uses. Most residents commute by car from single-family homes to places of work, services, goods, facilities, and recreation. Figure 3-3, *Existing General Plan Land Uses*, shows existing General Plan designations within the Planning Area. The prominent General Plan land uses in the Planning Area include Single Family Residential, Multi-Family Residential, Commercial and Services, and Open Space and Recreation. Other uses included, General Office, Industrial, Education, and Transportation, Communications, and Utilities Detailed descriptions of the residential, commercial, industrial, agricultural, institutional, and open space land use designations in the WSAP can be found in the WSAP, Appendix , WSAP Land Use Background Brief.

### *Los Angeles County Zoning Code (Title 22)*

Working in tandem with the General Plan to implement the goals and policies outlined therein is the County Code. The County Code codifies the County's Zoning Code (Title 22, Planning and Zoning). The Zoning Code, together with the Subdivision Code (Title 21) and zoning map, are implementation tools of the General Plan that provide details on specific allowable uses, design and development standards, and procedures in accordance with the land use designations assigned per the General Plan or applicable community-based plan(s). Zoning and subdivision regulations govern the division, design, and use of individual parcels of land, including minimum lot size, lot configuration, access, height restrictions, and yard setbacks standards for structures.

The County Code also establishes and defines the Community Standards District (CSDs), referenced in the General Plan. The CSDs apply three different types of development standards to a given community, which are: (1) community wide, (2) zone specific, or (3) area-specific development standards. Community-wide development standards apply to all proposed development and new land uses on any lot within the area covered by the CSD. Zone-specific standards refer to standards that apply only to proposed development or a new land use on a lot covered by a specific zone within the community, and which build upon Countywide zoning standards set forth in the Zoning Code. If a zone-specific development standard appears to conflict with a community-wide development standard, the zone-specific standard shall supersede the community-wide

standard. Area-specific standards apply only to lots within one or more specific geographic areas of a CSD. Where an area-specific development standard differs from either a community-wide or zone-specific development standard, the area-specific standard shall supersede all others. In addition to implementing area-specific, community-wide, and/or zone-specific development standards, as applicable, CSD regulations could include regulatory requirements related to density bonuses, inclusionary housing policy (County of Los Angeles 2020a), Accessory Dwelling Units (ADUs), and/or Junior Accessory Development Units (JADUs), among others. Over 25 CSDs have been established as a result of Division 10 of the Zoning Code.

The WSAP includes 18 zoning designations including 7 residential zoning classifications, 7 commercial zoning classifications, 2 manufacturing zoning classifications and 2 agricultural zoning classifications. The County designates WSAP land as the following in its General Plan: R-1/R-1-15000 (Single-Family Residence), R-2 (Two-Family Residence), R-3/ R-3-P (Limited Density Multiple Residence), R-4 (Unlimited Residence), RPD-1-4U (Residential Planned Development), A-1 (Light Agricultural), A-2 (Heavy Agricultural), C-1/C-1-DP (Restricted Business), C-2 (Neighborhood Business), C-3/C-3-DP (General Commercial), C-M (Commercial Manufacturing), CPD (Commercial Planned Development), M-1 (Light Manufacturing), M-1.5 (Restricted Heavy Manufacturing).

### *6th Cycle Housing Element (2021-2029)*

The County's Housing Element is one of the seven required elements of the General Plan. Per Section 65583(c)(7) of the California Government Code (CGC), Housing Element policies are shaped by, and must be consistent with, other General Plan elements and associated policies. The primary focus of the Housing Element is to ensure decent, safe, sanitary, and affordable housing for current and future residents of the unincorporated areas, including those with special needs. As such, the County is required to ensure the availability of residential sites, at adequate densities and appropriate development standards, in the unincorporated areas to accommodate its fair share of the regional housing need. Under the current regional housing need allocation (RHNA), the unincorporated County is required to provide the zoned capacity to accommodate the development of at least 89,232 housing units affordable to households at specific income levels using various land use planning strategies.

In order to satisfy its RHNA, the County adopted an update to the Housing Element for the "6th Cycle" 2021–2029 planning period (referred to herein as the "Housing Element") in May of 2022 consisting of: an adequate sites inventory; rezoning program; analysis of constraints and barriers; goals, policies, and implementation programs; amendments to Title 22, Planning and Zoning, (Zoning Code) of the Los Angeles County Code; and amendments to the General Plan Land Use Element (DRP 2022). While the County's unincorporated areas have the existing capacity to accommodate up to 34,278 of the required RHNA units, there is a remaining capacity shortfall that must be accounted for if the County is to fulfill its RHNA obligations as required by State law. Approximately 20,750 lower-income, 9,019 moderate-income, and 26,005 above-moderate-income units will be accommodated for via rezoning efforts implemented throughout the County (i.e., Housing Element Program 17, Adequate Sites for RHNA) (DRP 2022). The redesignation/rezoning effort(s) will primarily consist of implementing land use and zone changes to convert existing commercial and/or low-density residential designations to mixed-use and/or higher-density residential designations (DRP 2022).

### *Westside Area Plan Significant Ecological Areas*

Significant Ecological Areas (SEAs) are officially designated areas in the General Plan that have been identified as having irreplaceable biological resources. Each SEA has been configured to support sustainable populations of the biological resource located in that SEA and includes undisturbed to lightly disturbed habitat along with linkages and corridors to promote species movements. The objective of the SEA Program is to conserve genetic and physical diversity by designating biological resource areas that are capable of sustaining themselves into the future. Each SEA is sized to support sustainable populations of its component species and includes undisturbed or lightly disturbed habitat along with linkages and corridors that promote species movement.

The Westside Planning Area has three designated SEA, the Ballona Wetlands, Santa Monica Mountains, and El Segundo Dunes. The Ballona Wetlands are an important coastal ecological area located south of Marina del Rey. The Ballona Wetlands are one of the three remaining remnants of salt march in the County and are home to many sensitive plant and wildlife species. The Ballona Wetlands are governed by separate planning processes and are not anticipated to change as part of the proposed Project.

The portions of the Santa Monica Mountains within the Planning Area are an officially designated SEA and falls under the coastal resource area (CRA). The Santa Monica Mountains are part of the National Park System and is managed by the U.S. National Park Service. The recreation area preserves natural habitats, historical and cultural sites, offers recreational opportunities, and improves the air quality for the Los Angeles basin. The Santa Monica Mountains is covered by chaparral, oak woodlands, and coastal sage scrub (DRP 2015). The Santa Monic Mountains are governed by separate planning processes and are not anticipated to change as part of the proposed Project.

The El Segundo Dunes are an officially designated SEA and falls under the CRA. The El Segundo Dunes are the largest remaining representation of coastal dune community in Southern California. The 302-acre dune site is owned and managed by the Los Angeles World Airports (LAWA) and provides habitat for over 900 species. (BF 2024). The El Segundo Dunes are governed by separate planning processes and would not change as part of the proposed Project.

## 4.4.4 References

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# 4. Environmental Setting

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# 5. Environmental Analysis

This chapter examines the regulatory and environmental setting of the proposed Project, describes applicable policies of the Westside Area Plan (WSAP or proposed Project), analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts where necessary. This chapter has a separate section for each environmental issue area that was determined to need further study in the Draft Program Environmental Impact Report (PEIR). This scope was determined in the Notice of Preparation (NOP), which was published November 16, 2023, and through public and agency comments received during the NOP comment period from November 16, 2023, through December 15, 2023 (see Appendix A). Environmental issues and their corresponding sections are:

- 5.1 Aesthetics
- 5.2 Agriculture and Forestry Resources
- 5.3 Air Quality
- 5.4 Biological Resources
- 5.5 Cultural Resources
- 5.6 Energy
- 5.7 Geology and Soils
- 5.8 Greenhouse Gas Emissions
- 5.9 Hazards and Hazardous Materials
- 5.10 Hydrology and Water Quality
- 5.11 Land Use and Planning
- 5.12 Mineral Resources
- 5.13 Noise
- 5.14 Population and Housing
- 5.15 Public Services
- 5.16 Recreation
- 5.17 Transportation
- 5.18 Tribal Cultural Resources
- 5.19 Utilities and Service Systems
- 5.20Wildfire

## Organization of Environmental Analysis

To assist the reader with comparing information between environmental issues, each section is organized under the following major headings:

- Environmental Setting

  - Regulatory Background
  - Existing Conditions
- Thresholds of Significance
- Environmental Impacts
  - Methodology
  - Proposed Project Characteristics and Relevant WSAP Goals and Policies
  - Impact Analysis
- Cumulative Impacts
- Level of Significance Before Mitigation
- Mitigation Measures
- Level of Significance After Mitigation
- References

In addition, Chapter 1, *Executive Summary,* has a table that summarizes all impacts by environmental issue.

## Terminology Used in This Draft EIR

The level of significance is identified for each impact in this Draft PEIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- No Impact. The project would not change the environment.
- **Less Than Significant Impact.** The project would not cause any substantial, adverse change in the environment.
- **Less Than Significant Impact with Mitigation Incorporated.** The EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and Unavoidable Impact.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

# 5.1 AESTHETICS

This section identifies and evaluates issues related to aesthetics to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact related to scenic vistas; scenic resources in a state scenic highway; existing visual character or quality; or shadows, light, or glare that would adversely affect day or nighttime views in the area. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.1.1 Environmental Setting

### 5.1.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

There are no federal regulations, plans, or policies appliable to aesthetics issues relevant to the proposed Project.

#### State Laws, Regulations, and Policies

##### *Modernization of Analysis for Transit-Oriented Infill Projects (Senate Bill 743)*

Enacted in 2013, Senate Bill (SB) 743 implemented a number of changes to the California Environmental Quality Act (CEQA; California Public Resources Code [PRC] Section 21000 et seq.) that are designed to streamline some of its procedures for certain projects, including infill residential, mixed-use residential, and employment center projects near transit services. As specified in CEQA PRC Section 21099(d)(1), aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site in a transit priority area shall not be considered significant impacts on the environment, provided the project meets all of the following three criteria:

- The project is in a transit priority area[1]
- The project is on an infill site[2]

[1] CEQA PRC Section 21099(a)(7) defines a "transit priority area" as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in CEQA Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the a.m. and p.m. peak commute periods.

[2] CEQA Section 21099(a)(4) defines an "infill site" as either (1) a lot within an urban area that was previously developed; or (2) a vacant site where at least 75 percent of the site perimeter adjoins (or is separated by only an improved public right-of-way from) parcels that are developed with qualified urban uses.

- The project is residential, mixed-use residential, or an employment center[3]

CEQA PRC Section 21099(d)(2)(A) specifies that this subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. CEQA PRC Section 21099(e) further specifies that this section does not affect the authority of a public agency to establish or adopt thresholds of significance that are more protective of the environment. Some new residential and mixed-use development that could result from implementation of the WSAP, particularly development within one-half mile of an existing or planned major transit stop, as defined in PRC Section 21064.3, would meet the criteria above under which aesthetic impacts are not required to be considered. However, as permitted under the aforementioned CEQA sections, this PEIR considers and evaluates the potential aesthetic impacts of new development that could result with implementation of the WSAP in all applicable unincorporated areas of the County in the Westside Planning Area (Planning Area), including new infill development that could occur in a transit priority area.

### *State Scenic Highway Program*

California's Scenic Highway Program was created by the legislature in 1963 to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to designated scenic highways. The State laws governing the Scenic Highway Program are found in the California Streets and Highways Code, Division 1, Chapter 2, Article 2.5, Section 260 et seq. The State Scenic Highway System includes a list of federal and State highways that are either eligible for designation as scenic highways or have been so designated. These highways are identified in Streets and Highways Code Sections 263 through 263.8. A highway may be designated as scenic based on the amount of natural landscape that can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view.

When a City or County nominates an eligible scenic highway for official designation, it must identify and define the scenic corridor of the highway. A scenic corridor is the land generally adjacent to and visible from the highway. A scenic corridor is identified using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon. The corridor protection program does not preclude development but seeks to encourage quality development that does not degrade the scenic value of the corridor. Jurisdictional boundaries of the nominating agency are also considered. The agency must also adopt ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes. These ordinances make up the scenic corridor protection program.

### *California Building Code*

The California Building Code, Part 2 of Title 24 in the California Code of Regulations (CCR), is based on the International Building Code and combines three types of building standards from three different origins:

[3] CEQA Section 21099(a)(1) defines an "employment center" as a project situated on property zoned for commercial uses with a floor area ratio of no less than 0.75 and in a transit priority area.

- Building standards that have been adopted by State agencies without change from building standards contained 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 that 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 to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

## Regional Laws, Regulations, and Policies

There are no regional laws, regulations, and/or polices that are specifically applicable to aesthetics.

## Local Laws, Regulations, and Policies

### *Los Angeles County Code*

The Los Angeles County (County) Code includes applicable sections to visual resources in the WSAP. The following sections provide a brief overview of the applicable sections.

#### *Title 22 – Planning and Zoning*

Title 22 (Zoning Ordinance) describes the development standards that apply to each zone (e.g., height limits, setbacks, etc.). Subsections of Title 22 that are substantially relevant to visual resources include the following:

- **Chapter 22.48** (Yards, Highway Lines and Highways) contains provisions that pertain to the regulation of and development standards for highways and parkways;
- **Chapter 22.44** (Supplemental Districts) Part 9 (Rural Outdoor Lighting District) allows for the establishment of rural outdoor lighting districts, which promote and maintain dark skies for the health and enjoyment of individuals and wildlife;
- **Chapter 22.44** includes regulations that, in addition to other provisions in the Zoning Ordinance, regulate light and glare;
- **Chapter 22.44** Part 2 (Community Standards Districts) contains development regulations that supersede the countywide standards in the Zoning Ordinance for a list of communities that form districts for this purpose; and
- **Chapter 22.52** (General Regulations) contains a number of general regulations, including Part 10 (Signs), which regulates the design and siting of all signs in the unincorporated county. Part 10, Signs, is discussed further below.

### *Hillside Management Areas Ordinance*

With related provisions contained in Section 22.56.215 (Hillside Management and Significant Ecological Areas—Additional Regulations) of the Zoning Ordinance, Hillside Management Areas (HMAs) were established to ensure that development preserves the physical character and scenic value of areas of the county with a natural slope of greater than 25 percent. To accomplish this, provisions relating to HMAs encourage protecting scenic hillside views and conserving natural hillside character.

### *Mills Act Program*

Chapter 22.52 (General Regulations) Part 26 (Los Angeles County Mills Act Program) of the Zoning Ordinance is commonly referred to as the Los Angeles County Mills Act Program. The purpose of the program is to provide an incentive for owners of qualified historical properties in the unincorporated areas of the County to preserve, restore, and rehabilitate the historic character of such properties, thereby providing a historical, architectural, social, artistic, and cultural benefit to the citizens of the Planning Area, as authorized by the provisions of Article 12 (commencing with Section 50280) of Chapter 1, Part 1, Division 1 of Title 5 of the California Government Code, the provisions of which are commonly known as the "Mills Act."

### *Oak Tree Ordinance*

Contained in Part 16 (Oak Tree Permits) of Section 22.56 (Conditional Use Permits, Variances, Nonconforming Uses, Temporary Uses and Director's Review) of the Zoning Ordinance, the Oak Tree Ordinance was established to recognize oak trees as significant aesthetic, historical, and ecological resources. The ordinance establishes permitting requirements for removal of protected oak trees.

### *Signs*

Part 10 (Signs) of Chapter 22.52 (General Provisions) of the County Code regulates the design, siting, and maintenance of signs in the Planning Area. These regulations are intended to provide standards for the protection of property values, visual aesthetics, and the public health, safety, and general welfare of citizens, while still providing ample opportunities for businesses and the visual advertising industry to operate successfully and effectively.

### *Community Standards District*

**Baldwin Hills Community Standards District**

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September

15, 2021, Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

### *Los Angeles County General Plan*

#### *Conservation and Natural Resources Element*

The Conservation and Natural Resources Element of the County General Plan provides goals and policies relevant to aesthetic resources in Section VII, Scenic Resources, which include the following (DRP 2015):

**Goal C/NR 13:** Protected visual and scenic resources.

- **Policy C/NR 13.1.** Protect scenic resources through land use regulations that mitigate development impacts.
- **Policy C/NR 13.2.** Protect ridgelines from incompatible development that diminishes their scenic value.
- **Policy C/NR 13.3.** Reduce light trespass, light pollution and other threats to scenic resources.
- **Policy C/NR 13.4.** Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.
- **Policy C/NR 13.5.** Encourage required grading to be compatible with the existing terrain.
- **Policy C/NR 13.6.** Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.
- **Policy C/NR 13.7.** Encourage the incorporation of roadside rest stops, vista points, and interpretive displays into projects in scenic areas.
- **Policy C/NR 13.8.** Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
- **Policy C/NR 13.9.** Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:
    - Public safety and the protection of hillside resources through the application of safety and conservation design standards;
    - Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazards and protect natural features, such as significant ridgelines, watercourses and SEAs.

- **Policy C/NR 13.10.** To identify significant ridgelines, the following criteria must be considered:
  - Topographic complexity;
  - Uniqueness of character and location;
  - Presence of cultural or historical landmarks;
  - Visual dominance on the skyline or viewshed, such as the height and elevation of a ridgeline; and
  - Environmental significance to natural ecosystems, parks, and trail systems.

### 5.1.1.2 EXISTING CONDITIONS

The Planning Area is primarily in a highly urbanized part of the County and includes a variety of architectural styles and development patterns. The visual character of the Planning Area features wide topographic variation, including the Santa Monica Mountains to north and the coastal areas to the west. Development within the Planning Area primarily includes residential and commercial land uses, as well as open space and recreation areas (namely Kenneth Hahn State Recreation Area (KHSRA) and Inglewood Oil Fields), and the mountain range. The Planning Area contains one of the few remaining wetlands associated with Ballona Creek, which traverses the southern portion of the Planning Area. The western portion of the Planning Area is made up of a string of beaches and Marina del Rey. The eastern portion of the Planning Area includes the Baldwin Hills and KHSRA, which provide natural areas and recreational opportunities for residents. Views of surrounding hills and mountains are provided throughout the unincorporated communities in the Planning Area.

#### Ladera Heights, View Park, and Windsor Hills

The Ladera Heights, View Park, and Windsor Hills communities are made up of residential neighborhoods, commercial corridors and centers, industrial uses, civic and educational facilities, parks, and open spaces. The topography of most of the Ladera Heights, View Park, and Windsor Hills area is generally hilly, which defines the pattern of development across much of the area. View Park and Windsor Hills contain unique architectural development styles, including Spanish Colonial, Tudor, and Mediterranean Revival styles, with hillside residences. View Park and Ladera Heights also include Ranch and Mid-Century Modern style development. A number of prominent architects designed residential neighborhoods throughout this area, making it visually distinct. The View Park Historic District is roughly bounded by Mt. Vernon Drive, Enoro Drive, Northland Drive, Northridge Drive, Kenway Avenue, South Victoria Avenue, and Floresta Avenue, and displays a number of visually prominent residences and unobstructed views towards Downtown Los Angeles. See Chapter 5.5, *Cultural Resources*, for more information regarding the history and patterns of development in this area.

While the area is generally built-out with little remaining vacant land available for development, there are notable open spaces present, which dominate the visual landscape. The largest remaining open spaces include KHSRA in the northeastern portion of the area which is committed to passive and active recreational uses, and the Inglewood Oil Field, directly adjacent to the Baldwin Hills, which is governed by the BHCSD and contains oil field operations and undeveloped land. A prominent visual location in the community is the state-owned and managed Baldwin Hills Scenic Overlook), which is a 500-foot peak accessed from local trails. Panoramic views across Los Angeles from the Pacific Ocean to Downtown and beyond are available from this destination. Several trails in these areas, including Stocker Trail, afford unique panoramic views. There are no major

highways that divide the community, and the major arterials include South La Cienega Boulevard, West Slauson Avenue, Stocker Street, and Angeles Vista Boulevard. The Ladera Heights, View Park, and Windsor Hills communities do not contain any portion of, nor is within the viewshed of, a designated or eligible scenic highway (Caltrans 2024).

### Marina del Rey

Marina del Rey is an unincorporated seaside community with a harbor that is a major boating and water recreation destination of the Planning Area. Marina del Rey neighbors Ballona Creek and is north of Playa del Rey and southeast of Venice. Pacific Coast Highway (PCH) forms the eastern boundary of the area. There are no major highways that divide the community. Marina del Rey is well known for its scenic harbor views, which can be seen via Marina, Admiralty Way, and Fiji Way. The harbor connects directly to the Pacific Ocean. Marina del Rey is the largest human-made, small boat harbor in the country and is highly varied, gradually transitioning from an intensely urban character in the northeastern portion of the Planning Area to more natural scenic areas along the coast. Marina del Rey does not contain any portion of a designated or eligible scenic highway (Caltrans 2024). The area is designated a Coastal Zone and thus, land uses are governed through a Local Coastal Program (LCP), which is the main land use document for coastal area development and natural resource protection. No changes to land use would occur through the WSAP.

### Ballona Wetlands

The Ballona Wetlands is an important Ecological Reserve just south of Marina del Rey, north of Playa Del Rey, and west and northwest of Playa Vista in the County. The Ballona Wetlands is one of three remaining remnants of salt marsh in the County. The Ballona Wetlands are officially designated a Significant Ecological Area (SEA). Ballona Creek, which contains a public access bike lane, is a nine-mile flood protection channel that drains from the Santa Monica Mountains to the north, Interstate (I-) 10 to the east, and Baldwin Hills to the south. Views from trails in the Ballona Wetlands are of the natural wetland features, native vegetation, Ballona Creek, and the Pacific Ocean. Similar to Marina del Rey, the Ballona Wetlands are designated a Coastal Zone and therefore land uses are governed through a LCP. The Ballona Wetlands do not contain any portion of a designated or eligible scenic highway (Caltrans 2024).

### Westside Islands - West Los Angeles (Sawtelle Veteran Affairs [VA]), West Fox Hills, Franklin Canyon, and Gilmore Island

The Westside Islands are spread throughout the Planning Area. West Los Angeles (LA)/Sawtelle VA is east of Santa Monica, north of Mar Vista and Culver City, west of Beverly Hills, and south of Westwood and Brentwood. I-405 runs north to south through the center of the West LA/Sawtelle VA. I-10 forms the southern border of the area. State Route (SR-) 2 runs east to west through the center of the community. The West LA/Sawtelle VA communities do not contain any portion of, nor is within the viewshed of, a designated or eligible scenic highway (Caltrans 2024). The West Los Angeles Veterans Affairs Historic District, Los Angeles National Cemetery, and the Wilshire Federal Building are listed as historic districts on the National Register of Historic Places because of their architectural, cultural, and historical significance (see Chapter 5.5, *Cultural Resources,* for more information).

West Fox Hills is a small community to the west of Ladera Heights, View Park, and Windsor Hills. It is made up of mostly single-family residential and commercial uses. Franklin Canyon lies between the San Fernando Valley and Beverly Hills and is made up of mostly parkland and trails. Gilmore Island is south of West Hollywood and north of Downtown Los Angeles and is currently being used as a parking lot for CBS Studio Complex.

### Visual Character

Visual character is the objective composition of the visible landscape in a viewshed and is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and is therefore highly subjective. As discussed previously, visual character in the Planning Area is characterized by the Santa Monica Mountains to the north, ocean views to the west, and scenic views of surrounding mountains and horizon lines throughout the Planning Area. The Planning Area primarily consists of residential and commercial uses and designated open space for recreational and industrial uses.

### Scenic Vistas and Corridors

A scenic viewshed provides a scenic vista from a given location, such as a highway, a park, a trail, river/waterway, or even from a particular neighborhood. The boundaries of a viewshed are defined by the field of view to the nearest ridgeline. Scenic viewsheds vary by location and community and can include ridgelines, unique rock outcroppings, or various other unusual or scenic landforms. The General Plan supports the protection and preservation of ridgelines and allows individual communities to identify and regulate their ridgeline resources. While the General Plan recognizes the importance of scenic resources in the County, there are no specific views or corridors that are identified for conservation purposes (DRP 2015). While there are no designated view corridors identified in the General Plan, there are a number of scenic resources in the Planning Area, including open spaces, ridge lines, and sweeping scenic vistas in Ladera Heights, View Park, and Windsor Hills, coastal views in Ballona Wetlands and Marina del Rey, and views of unique architectural features and structures throughout the Planning Area.

According to the California Department of Transportation (Caltrans) list of designated scenic highways under the California Scenic Highway Program, there are no designated scenic highways in the Planning Area; however, the Pacific Coast Highway Route 1, which runs north to south along the Pacific coastline, is considered eligible (Caltrans 2024).

### Unique Scenic Resources

Southern California has lost many of its natural scenic resources due to a variety of human activities. In the absence of adequate land use controls, many scenic resources have been adversely affected by unsightly development and sprawl. The visual pollution associated with the proliferation of billboards, signs, utility lines, and unsightly uses detracts from and often obscures many of the county's scenic resources. The County recognizes that mountain vistas and other scenic features of the region are a significant resource. According to the General Plan, scenic resources can include designated scenic highways and corridors (or routes), hillsides, viewsheds, and ridgelines (DRP 2015). This analysis also considers parks and the downtown skyline to be locally valuable visual resources in the Planning Area. Major issues associated with scenic resources involve: (1) their

protection from human activities; and (2) regulation of hillsides and hillside development (DRP 2015). As further discussed in Chapter 5.5, *Cultural Resources*, there are four historic districts in the Planning Area, which contain unique visual elements, including View Park Historic District, West Los Angeles Veteran Affairs Historic District, Los Angeles Cemetery, and the Wilshire Federal Building.

### Light and Glare

There are two types of artificial, or human-made, light sources: (1) point sources (e.g., illuminated signage, street light poles, vehicle headlights); and (2) indirect sources that reflect light onto adjacent properties (e.g., reflective or light-colored surfaces). The effect produced by indirect light sources is commonly referred to as "glare." Point sources are generally addressed in the analysis of nighttime illumination impacts, while indirect sources are addressed in the analysis of daytime and nighttime glare impacts. Nighttime illumination of varying intensities is characteristic of most urban and suburban land uses, including those in the Planning Area. Uses that are considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas. Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Glare-sensitive uses can include light-sensitive uses and transportation corridors (i.e., roadways). Most glare in the Planning Area is generated by reflective materials on existing buildings and glare from vehicles passing on major street corridors, including La Brea Avenue, Slauson Avenue, and La Cienega Boulevard. The relative effects from lighting and glare are site specific.

## 5.1.2 Thresholds of Significance

Consistent with the CEQA Guidelines Appendix G, Environmental Checklist, and County practice, the Project would have a significant impact to aesthetics if it would:

AE-1 Have a substantial adverse effect on a scenic vista.

AE-2 Be visible from or obstruct views from a regional riding, hiking, or multi-use trail.

AE-3 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

AE-4 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

AE-5 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

## 5.1.3 Environmental Impacts

### 5.1.3.1 METHODOLOGY

The evaluation of aesthetics and aesthetic impacts is highly subjective, yet it must objectively identify the visual features of the existing environment and their importance. The characterization of aesthetics involves establishing existing visual character, including resources and scenic vistas unique to the Planning Area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), viewing points/locations, and existing light and glare (e.g., nighttime illumination). Changes to the existing aesthetic environment that would result from implementation of the WSAP are identified and qualitatively evaluated based on the proposed modifications to the existing setting and the viewer's sensitivity. This analysis focuses on the existing visual character in the Planning Area, County policies, and whether future projects facilitated by the WSAP would result in physical impacts to aesthetics.

### 5.1.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 1:** Unincorporated communities with distinct identities and uses.

- **Policy LU 1.1.** Maintain the diversity, uses, character, and unique identities of the unincorporated communities in the Westside Plan Area.

**Goal LU 3:** A community of distinct and livable places.

- **Policy LU 3.2.** Locate and design development to respect the area's natural landforms and open spaces.
- **Policy LU 3.8.** Require new development along major thoroughfares and at the edges of commercial centers to be located and scaled to provide transitions in building height and bulk, consistent with the character of adjacent low-scale neighborhoods.
- **Policy LU 3.9.** Encourage the integration of neighborhood-specific cultural, historical, and architectural elements in new development and renovations, whenever possible.
- **Policy LU 3.10.** Promote the inclusion of public art in commercial and mixed-use projects that reflects the area's historic and cultural heritage.

**Goal LU 5:** Quality residential neighborhoods that are great places to live.

- **Policy LU 5.1.** Maintain and protect the character and scale of existing residential neighborhoods by prioritizing large-scale development on commercial corridors.

- **Policy LU 5.3.** Ensure that commercial uses within residential neighborhoods are located and designed to be compatible with and complement existing residences with regard to scale, building orientation, setbacks, façade details and ground floor treatments.

**Implementation Program LUI 1.** In consultation with stakeholders and residents, design and implement a *Placemaking Plan* that may include:

- Additions or improvements of infrastructure such as: entry signage and monuments, street trees, benches, shade structures, recycling and trash bins on sidewalks, crosswalks, wayfinding signage, and public art installations.
- Integration of pocket parks and open spaces on public properties and in streetscapes.
- Implementation of public art programs to enhance community identity, which may includer placement of murals on blank commercial building facades. This may be coordinated with public agencies, schools, community groups and organizations, and local artists.

**Implementation Program LUI 3.** Based on the *Placemaking Plan* (LUI 1), develop design and engineering plans, acquire funding, and implement for streetscape improvements, street furniture, signage, entry monuments/signate, and other elements.

**Implementation Program LUI 4.** Pursue and administer funding for loans and grants for the maintenance and renovation of façades and property of private commercial and residential properties and buildings.

**Implementation Program LUI 6.** Consider developing incentives, such as low interest loans or grants, that encourage the owners and operators of cell towers located on ridgelines to consolidate facilities to the extent feasible, design improvements to enhance their visual quality, and incorporate extensive landscape.

### Conservation and Open Space Element

**Goal COS 3:** The Inglewood Oil Field is transformed into a public and environmental asset.

- **Policy COS 3.1.** Incorporate open space preservation, habitat restoration, and the provision of new recreational opportunities into plans for the future re-use of the Inglewood Oil Field.
- **Policy COS 3.2.** Ensure that future use of the Inglewood Oil Field is linked with adjoining recreational areas, trails, residential neighborhoods, and commercial/mixed-use districts for the enjoyment of County residents.

**Goal COS 5:** The Westside's scenic resources and natural features are protected from adverse impacts.

- **Policy COS 5.1.** Require new development to respect, integrates with, and complement the natural features of the land, including conforming building massing to topographic forms, restricting grading of steep slopes, and encouraging the preservation of visual horizon lines and significant hillsides as prominent visual features.

- **Policy COS 5.2.** Explore designating significant ridgelines in Ladera Heights and View Park, Windsor Hills as Hillside Management Areas to protect ridgelines from incompatible development that diminishes their scenic value, and ensure their conservation, preservation, and management.

**Implementation Program COSI 4.** Conduct a study evaluating the potential designation of significant ridgelines in Ladera Heights and View Park-Windsor Hills. Upon completion, prepare a map of the ridgelines and identify any recommended updates to Development Code standards for their protection.

### Historic Preservation Element

**Goal HP 2:** Protect Historic Resources from Demolition and Inappropriate Alteration.

- **Policy HP 2.3.** Provide guidance and technical assistance for the appropriate maintenance and repair of historic buildings so that their historic character is maintained. Issues addressed should include material treatments, appropriate replacement roof materials and wall cladding, window and door repair and replacement, and compatible additions or alterations.

**Goal HP 3:** Protect the Historic Character of Neighborhoods and Districts.

- **Policy HP 3.1.** Develop guidelines for street and sidewalk improvements, street lighting, retaining walls and other infrastructure projects to ensure that new construction within and adjacent to historic neighborhoods and districts is compatible in design, scale, and materials.

**Implementation Program HRI 7.** Create educational materials on the appropriate maintenance and repair of historic buildings with a focus on common repair and maintenance issues including material treatments, appropriate replacement roof materials and wall cladding, window and door repair and replacement, and compatible additions or alterations.

### Public Facilities and Services Element

**Goal PF 3:** Infrastructure and utility systems that provide reliable and equitable services to Westside residents.

- **Policy PF 3.1.** Minimize visual impacts of existing electrical distribution and transmission lines near Slauson Avenue and La Brea Avenue and other locations

- **Policy PF 3.2.** Explore opportunities to incorporate art on transmission towers within the Kenneth Hahn State Recreation Area to reduce visual blight and improve overall aesthetics.

## 5.1.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

### Impact 5.1-1: Would the proposed Project have a substantial adverse effect on a scenic vista? [Threshold AE-1]

**Less Than Significant Impact.** The WSAP is a long-range policy document intended to respond to local planning challenges and guide long-term development. The Planning Area is bounded to the west by the Pacific Ocean coastline. Views of the Pacific Ocean can be viewed from Marina del Rey harbor and the Baldwin Hills Scenic Overlook in Ladera Heights. No changes to land use or zoning are proposed in Marina del Rey, Ballona Wetlands, in the viewshed of the Baldwin Hills Scenic Overlook, or in other areas with significant ridgelines or vistas under the WSAP. While the Inglewood Oil Field is identified as an Opportunity Site, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP – any future changes would be conducted under a separate planning process.

The land use/zoning changes proposed in the WSAP are limited to infill redevelopment sites in the highly urbanized parts of the Planning Area. Future development facilitated by the WSAP could alter the appearance of existing conditions, primarily along primary arterials, including Slauson Avenue, South La Cienega Boulevard, Crenshaw Boulevard, and West Centinela Avenue. However, the implementation of the WSAP goals and policies would protect visual character and scenic resources, such as Policy COS 5.1, which requires future development be compatible with natural features and preserve prominent visual features, and Policy COS 5.2, which ensures the protection of ridgelines in Ladera Heights, View Park, and Windsor Hills from incompatible development that would diminish their scenic value. Development standards and design guidelines, pursuant to the General Plan, would also ensure that scenic resources in the Planning Area, such as views of the ocean, are not adversely affected. Therefore, the WSAP would not substantially impact the visual appearance or scenic resources in the Planning Area, and impacts would be less than significant.

### Impact 5.1-2: Would the proposed Project be visible from or obstruct views from a regional riding, hiking, or multi-use trail? [Threshold AE-2]

**Less Than Significant Impact.** As discussed in Chapter 5.16, *Recreation*, the Park to Playa Regional Trail has two segments running through the Planning Area: the Stocker Trail and trails in the KHSRA. The Park to Playa Trail is a 13-mile regional trail that links a network of trails, parks, and open spaces from the Baldwin Hills Parklands to the Pacific Ocean. Other segments of the Park to Playa Trail include Blair Hills, Baldwin Hills Scenic Overlook, Culver City Park, and Ballona Creek Bike Path (DRP 2023). The Ballona Creek Bike Path is a County-maintained Class I bike path in the Planning Area that parallels Ballona Creek connecting to Marina del Rey and the Pacific Ocean (LADPR 2024).

Land use changes and zoning updates proposed in the WSAP would not occur in existing open space areas or where regional riding, hiking, or multi-use trails occur. Therefore, implementation of the WSAP is not anticipated to obstruct views of trails; however, future development resulting in increases in building heights or changes to building forms could result in visual impacts that are visible from regional trails. Implementation of WSAP goals and policies would guide the design of future development to integrate with existing conditions. Policy LU 3.3 ensures development is designed and located in respect to the Planning Area's open spaces. Policy 3.7 requires future development to be consistent with existing neighborhood character, including building height. Policy LU 5.1 ensures the protection and maintenance of existing character and scale. Therefore, the

implementation of the WSAP would not have adverse effects on existing views and impacts would be less than significant.

**Impact 5.1-3: Would the proposed Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? [Threshold AE-3]**

**Less Than Significant Impact**. There are no designated scenic highways in the Planning Area; however, PCH, which runs north to south along the Pacific coastline, is considered eligible (Caltrans 2024). Land use and zoning changes in the Planning Area that would facilitate future development are not in proximity to and would not interfere with scenic resources in a state highway. As discussed in Chapter 5.5, *Cultural Resources*, there are four historic districts in the Planning Area. No land use changes or zoning updates are proposed in these historic districts. Therefore, impacts to scenic resources in a state scenic highway would be less than significant.

**Impact 5.1-4: Would the proposed 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 a publicly accessible vantage point.) [Threshold AE-4]**

**Less Than Significant Impact.** The WSAP includes proposed land use changes and zoning updates to 12 specific Opportunity Sites[4] shown in Figure 3-5, *Opportunity Sites*. These opportunity areas are focused in Ladera Heights, View Park, Windsor Hills, and West Fox Hills. Refer to Chapter 4, *Environmental Setting*, of this Draft PEIR for a description of each Opportunity Site's existing setting. They are generally along primary arterials, including Slauson Avenue, South La Cienega Boulevard, Crenshaw Boulevard, and West Centinela Avenue, in the highly urbanized part of the Planning Area. Because the Planning Area is predominantly built out, new development facilitated by the WSAP would have the potential to alter the visual appearance of the Planning Area.

The goals and policies implemented by the WSAP would ensure that future development would preserve and enhance the Planning Area's visual character and quality, such as Policy LU-5.1, which establishes that any new development is consistent and compatible with existing design quality, and Policy LU-3.2, which ensures new construction is designed to complement the scale and character of existing neighborhoods. Moreover, any future development under the WSAP would be required to comply with County regulations at the time that maintain the Planning Area's character, such as development standards and commercial and residential design guidelines. Development standards and design guidelines would also ensure that development under the WSAP would continue to be maintained and be compatible with the Planning Area's visual character. Therefore, impacts would be less than significant.

[4] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

**Impact 5.1-5: Would the proposed Project create a new source of substantial shadows, light, or glare that would adversely affect day or nighttime views in the area? [Threshold AE-5]**

**Less Than Significant Impact.** The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates outside the intended area. Glare is light that shines directly or is reflected from a surface into a viewer's eyes. Spill light and glare impacts are effects of a project's exterior lighting on adjoining uses and areas.

The Planning Area is in a highly urbanized and developed part of the County. Sources of light in the Planning Area include building lighting (interior and exterior), security lighting, sign illumination, street lighting, and parking area lighting. These sources of light and glare are mostly associated with the residential, commercial, and industrial uses in the Planning Area. Other sources of nighttime light and glare include streetlights, vehicular traffic along surrounding roadways, and ambient lighting from surrounding communities.

Existing sources of light and glare in this urbanized Planning Area are similar to those that would be found in the surrounding urbanized area, including building interior/exterior lighting, streetlamps, parking-lot lighting, storefront and signage lighting, and car headlights. Nighttime lighting is necessary to provide and maintain a safe and secure environment; however, these lights have the potential to produce spillover light and glare. Although nighttime light is a common feature of urban areas, spillover light can adversely affect light-sensitive uses, such as residential units at nighttime. The WSAP includes proposed land use changes and zoning updates to 12 specific Opportunity Sites shown in Figure 3-5, *Opportunity Sites*. These Opportunity Sites are focused in Ladera Heights, View Park, and Windsor Hills and West Fox Hills. As such, future development would occur in areas where development already exists. Future development in accordance with the WSAP would allow for the intensification and redevelopment of existing land uses, which could increase nighttime light and glare in the Planning Area. Future development would be subject to compliance with County policies and standards, including provisions regarding signs and outdoor lighting. Resulting developments would also be in an urban setting where street lighting, parking area lighting, and auto traffic are common. For these reasons, the development would not create a new source of substantial light or glare that would adversely affect day or nighttime views. Policy HP 3.1 ensures guidelines are set in place for street lighting to ensure new construction adjacent to historic districts are compatible with existing conditions. Additionally, the California Building Code contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulation of light power and brightness, shielding, and sensor controls. These regulations would serve to mitigate potential impacts of new land uses. Therefore, impacts would be less than significant.

## 5.1.4 Cumulative Impacts

This section presents an analysis of the cumulative effects of the WSAP in combination with other past, present, and reasonably foreseeable future projects that could cause cumulatively considerable impacts. Significant cumulative impacts related to aesthetics could occur if the incremental impacts of the WSAP combined with the incremental impacts of one or more cumulative projects.

**Impact 5.1-6: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect on a scenic vista?**

**Less Than Significant Impact.** Development that could occur with the implementation of the WSAP would potentially introduce increased density, scale, and height than what currently exists in the Planning Area. Future development facilitated by the implementation of the WSAP would be required to comply with County policies and standards regarding design and character to reduce any potential impacts to a scenic vista. Land use changes and zoning updates are limited to Ladera Heights, View Park, Windsor Hills, and West Fox Hills communities and no development is proposed in other portions of the Planning Area. Therefore, there would be a less than cumulatively considerable impact.

**Impact 5.1-7: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, be visible from or obstruct views from a regional riding, hiking, or multi-use trail?**

**Less Than Significant Impact.** The Planning Area consists of KHSRA and Baldwin Hills Scenic Overlook, which provides access to a variety of trails with views of Los Angeles Basin, surrounding mountains, and the Pacific Ocean. Bike trails include the Ballona Creek Bike Path, which parallels Ballona Creek. Construction of new development and increases in building heights and changes to building forms could result in visual impacts that are visible from regional trails. Land use changes and zoning updates are limited to Ladera Heights, View Park, Windsor Hills, and West Fox Hills communities and no development is proposed in other portions of the Planning Area. The implementation of policies included in the WSAP and the General Plan that would guide the design of future development and would lessen the effect such that future development would integrate into existing character and would not have adverse impacts to existing views in the Planning Area that are available from regional riding, hiking or multi-use trails. Therefore, there would be a less than cumulatively considerable impact.

**Impact 5.1-8: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings in a state scenic highway?**

**Less Than Significant Impact.** As described previously in Section 5.1.1, Environmental Setting, there are no designated state scenic highways or any visible designated scenic highways in the Planning Area. However, the PCH is considered an eligible scenic highway. Primary highways in the Planning Area include the PCH, I-405, I-10, and SR-90. No land use changes or zoning updates are proposed adjacent to a state scenic highway that would result in substantial damage to scenic resources. Implementation of the WSAP is not anticipated to substantially damage scenic resources in a state scenic highway and its contribution to a potentially significant cumulative impact to scenic resources would be less than cumulatively considerable.

**Impact 5.1-9: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, substantially degrade the existing visual character or quality of public views or conflict with applicable zoning and other regulations governing scenic quality?**

**Less Than Significant Impact.** Development that could occur with implementation of the WSAP could result in substantial changes to the visual character of sites and surroundings. Cumulative development around transit and commercial corridors would result in development of increased density, greater scale, and higher height than currently exists in many areas in the Planning Area and could result in potentially adverse effects to visual character and the quality of public views. The WSAP includes proposed land use changes and zoning updates to 12 specific Opportunity Sites focused in Ladera Heights, View Park, Windsor Hills, and West Fox Hills. Because the Planning Area is predominantly built out, new development would have the potential to alter the visual appearance of the Planning Area but would not substantially degrade the Planning Area's visual character or quality. Future development facilitated by the implementation of the WSAP would be required to comply with County policies and standards regarding design and character to reduce any potential impacts to scenic quality along with the WSAP goals and policies that intend to minimize the visual impact of new development as a result of the WSAP. Therefore, there would be a less than cumulatively considerable impact.

**Impact 5.1-10: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, create a new source of substantial light or glare that would adversely affect day or nighttime views?**

**Less Than Significant Impact.** The Planning Area is an urbanized area that includes a variety of residential, commercial, and public uses. Existing sources of light and glare in the Planning Area are similar to those that would be found in any urbanized area, and include streetlamps, parking-lot lighting, storefront and signage lighting, and car headlights. Nighttime lighting is necessary to provide and maintain safe, secure, and attractive environments; however, these lights have the potential to produce spillover light and glare. Although nighttime light is a common feature of urban areas, spillover light can adversely affect light-sensitive uses, such as residential units at nighttime. Glare results when a light source directly in the field of vision is brighter than the eye can comfortably accept. Squinting or turning away from a light source is an indication of glare. The presence of a bright light in an otherwise dark setting may be distracting or annoying or may diminish the ability to see other objects in the darkened environment. Reflective glare, such as the reflected view of the sun from a window or mirrored surface, can be distracting during the day. Land use changes and zoning updates are focused in areas in the Ladera Heights, View Park, Windsor Hills, and West Fox Hills communities. Most glare in the Planning Area is generated along major street corridors, including La Brea Avenue, Slauson Avenue, and La Cienega Boulevard. Development of housing, commercial, mixed-use, and other land uses at increasing densities that could occur under the WSAP would increase nighttime lighting and sources of daytime glare in the Planning Area and surrounding areas. Development in the Planning Area would be subject to compliance with objective County policies and standards, including provisions regarding signs and outdoor lighting. Further, the majority of resulting developments would be in an urban setting where street lighting, parking area lighting, and auto traffic are common. Implementation of the WSAP would have a less than cumulatively considerable impact.

## 5.1.5 Level of Significance Before Mitigation

After compliance with County ordinances, development standards, and WSAP goals and policies, impacts would be less than significant.

## 5.1.6 Mitigation Measures

No significant adverse impacts related to aesthetics were identified and no mitigation measures are required.

## 5.1.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to aesthetics have been identified.

## 5.1.8 References

California Department of Transportation (Caltrans). 2024. Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

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# 5.2 AGRICULTURE AND FORESTRY RESOURCES

This section identifies and evaluates issues related to agriculture and forestry resources to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact related to the loss or conversion of agricultural resources (e.g., protected farmland, agricultural zoning, or forestry resources (e.g., forest land, timberland, or Timberland Production zoning). This section describes the physical environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment. The information in this section is based on the Los Angeles County 2035 General Plan (General Plan), review of aerial photographs, and review of state farmland maps.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Comments received did not identify any substantive issues or questions related to agriculture and forestry resources. Table 2-1, *Notice of Preparation and Comment Letters Summary,* in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.2.1 Environmental Setting

This section discusses the existing environmental setting relative to agriculture and forestry resources. As described in Chapter 3, *Project Description,* the Project is evaluated at a programmatic level and the analysis is based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could be considered. As a result, this section describes generally the Westside Planning Area (Planning Area) and, where applicable, the general areas of future potential land use changes as part of implementing the WSAP, as those are the areas that may result in changes to the environment that were not already considered in previous environmental analyses or studies.

### 5.2.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *Farmland Protection Policy Act*

The U.S. Department of Agriculture (USDA) administers the Farmland Protection Policy Act of 1981. The act discourages federal activities that would convert farmland to nonagricultural purposes and assures to the extent possible that federal programs are administered to be compatible with state, local government, and private programs and policies to protect farmland. For purposes of the act, farmland includes land defined as prime, unique, or farmlands of statewide or local importance as well as forest land, pastureland, or cropland; it does not include water or urban built-up land. Projects are subject to Farmland Protection Policy Act requirements if they could irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency (NRCS 2022). Federal agency representatives of projects that have the potential to convert farmland to non-farm use coordinate with their local office of the Natural Resources Conservation Service (NRCS) or USDA Service Center. The NRCS uses a Land Evaluation and Site Assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites

of federally funded and assisted projects. The resulting score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. The LESA system, as adopted for use in California, is described further below.

## State Laws, Regulations, and Policies

### *California Public Resources Code*

Section 4526 of the California Public Resources Code defines timberland as land (other than land owned by the federal government and land designated by the county board of supervisors as experimental forest land) that is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species are determined by the county board of supervisors on a district basis after consultation with district committees and others. According to Section 12220(g) of the California Public Resources Code, forest land refers to "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

### *Land Evaluation and Site Assessment*

The California Department of Conservation (DOC) adopted the NRCS's LESA model for use in California. The California Environmental Quality Act (CEQA; Public Resources Code Section 21000 et seq.) recommends, but does not require, use of the LESA system's numeric threshold in evaluating the significance of potential impacts of converting mapped farmland to nonagricultural use.

### *California Land Conservation Act (Williamson Act)*

The Williamson Act provides tax incentives to retain prime agricultural land and open space in agricultural use, which subsequently slows its conversion to urban development. The Williamson Act requires a 10-year contract between the County and landowners who enter into contracts with local government for long-term use restrictions on qualifying agricultural and open space land. Due to the urbanized location of the Planning Area, there is no agricultural land under a Williamson Act contract. As such, the Williamson Act Contract Land map designates the Planning Area as "non-enrolled land" (DOC 2022).

### *California Government Code*

The California Government Code includes a definition for a "timberland production zone." The Planning Area does not contain any timber resources that would qualify as a timberland production zone.

### *Department of Conservation Farmland Mapping and Monitoring Program*

The DOC's Farmland Mapping and Monitoring Program (FMMP) provides consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. The FMMP map categories Prime Farmland, Unique Farmland, and

Farmland of Statewide Importance. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. Data are also released in statistical formats—principally the biennial California Farmland Conversion Report. The following describes the Important Farmland categories (DOC 2022).

**Prime Farmland.** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

**Farmland of Statewide Importance.** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

**Unique Farmland.** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

**Farmland of Local Importance.** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

**Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock.

**Urban and Built-Up Land.** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

**Other Land.** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

## Regional Laws, Regulations, and Policies

There are no regional laws, regulations, and/or policies that are specifically applicable to agriculture and forestry resources.

## Local Laws, Regulations, and Policies

### *Los Angeles County General Plan*

The General Plan includes guiding principles, which inform the County's goals, policies, and implementation actions. The following guiding principle is applicable to agricultural and forestry resources:

"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."

The Conservation and Natural Resources Element of the County's General Plan provides goals and policies relevant to agricultural and forestry resources (DRP 2015):

**Goal C/NR-8:** Productive farmland that is protected for local production, open space, public health, and the local economy.

- **Policy C/NR 8.1**. Protect Agricultural Resource Areas (ARAs), and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, from encroaching development and discourage incompatible adjacent land uses.
- **Policy C/NR 8.2.** Discourage land uses in the ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, that are incompatible with agricultural activities.

**Goal C/NR-9:** Sustainable agricultural practices.

- **Policy C/NR 9.1.** Support agricultural practices that minimize and reduce soil loss and prevent water runoff from affecting water quality.
- **Policy C/NR 9.2.** Support innovative agricultural practices that conserve resources and promote sustainability, such as drip irrigation, hydroponics, and organic farming.
- **Policy C/NR 9.3.** Support farmers' markets throughout the county.
- **Policy C/NR 9.4.** Support countywide community garden and urban farming programs.
- **Policy C/NR 9.5.** Discourage the conversion of native vegetation to agricultural uses.

### *Community Standards District*

#### *Baldwin Hills Community Standards District*

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and

controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021, Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

The County Code consists of the regulatory, penal, and administrative ordinances for the County. Components of the County Code that are applicable to the subject of agriculture and forestry resources are identified below (County of Los Angeles 2022):

> **Title 22- Planning and Zoning.** Chapter 22.16 (Agricultural, Open Space, Resort and Recreation, and Watershed) of Title 22 outlines the purpose, use restrictions, and general regulation of agricultural uses.

### 5.2.1.2 EXISTING CONDITIONS

Population growth and accompanying development in the County has resulted in the conversion of agricultural land to nonagricultural uses. Remaining agricultural land in the unincorporated County is considered an important nonrenewable resource. The County includes a relatively small quantity of land that is designated pursuant to the FMMP, meaning that it meets one of the designations described below and therefore is "Important Farmland." Approximately 90 percent of the county's Important Farmland is in northern County in the Antelope Valley; the remainder is in the Santa Clarita Valley, the Santa Monica Mountains, and the San Fernando Valley (DRP 2015).

The DOC's FMMP maps the Planning Area, most of which is designated as Urban and Built-Up Land. As described previously, Urban and Built-Up Land is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures (DOC 2022).

#### Agricultural Uses

A majority of the Planning Area is designated Urban and Built-up Land (DOC 2022). One portion of the Ladera Heights, Park View, and Windsor Hills area is designated as Other Land, which means this land is not suitable for agricultural land and is surrounded on all sides by urban development. The portion designated Other Land includes the Inglewood Oil Field and KHSRA. There is no land designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance (DOC 2022). There are no designated agricultural lands in the Planning Area.

### Agricultural Designations and Contracts

As mentioned previously, the majority of the Planning Area is designated Urban and Built-Up Land (DOC 2022). Due to the urbanized location of the Planning Area, there is no agricultural land under a Williamson Act contract. As such, the Williamson Act Contract Land map designates the entire Planning Area as "non-enrolled land" (DOC 2022).

### Forest Resources

Forest land is defined in the California Public Resources Code as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetic, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (Public Resources Code Section 12220[g]). Timberland is considered land that is available for and capable of growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees (Public Resources Code Section 4526). In the unincorporated areas of Los Angeles County, Angeles National Forest, along with a small portion of Los Padres National Forest, encompasses 650,000 acres. Angeles National Forest extends along the San Gabriel Mountains and is divided into two sections totaling 1,018 square miles, which equates to approximately 25 percent of the county's land area. The U.S. Forest Service is responsible for managing public forest lands; however, nearly 40,000 acres of the national forests are privately owned. These privately-owned areas are commonly referred to as inholdings, and the County retains responsibility for their land use regulation. The County also includes small areas of forest outside of the National Forests. These consist primarily of small areas in the Santa Monica Mountains, the Sierra Pelona, and areas of the San Gabriel Mountains adjacent to Angeles National Forest. Forest lands in the county are generally zoned Open Space (O-S) and Watershed (W) zones. The majority of Angeles National Forest is composed of chaparral, rather than forest. The forests in the county are limited and generally consist of small stands of trees growing in riparian areas and in the higher elevations of the San Gabriel Mountains. Because of the limited amount of forest resources, there is no timberland in the county. The Planning Area is not in areas defined as forest land, timberland, or timberland production.

## 5.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County practice, a project would normally have a significant effect on the environment if the project would:

AG-1 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.

AG-2 Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.

AG-3 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]).

AG-4 Result in the loss of forest land or conversion of forest land to non-forest use.

AG-5 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 non-forest use.

## 5.2.3 Environmental Impacts

### 5.2.3.1 METHODOLOGY

The analysis of agriculture and forestry resources in this section is based on a review of the project description and available literature from state and local agencies. The analysis focuses on the existing agricultural uses in the Planning Area, County policies, and whether future projects facilitated by the WSAP would result in physical impacts on agriculture and forestry resources.

### 5.2.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

The WSAP is intended to guide long-term growth of the Planning Area, enhance community spaces, promote a stable and livable environment that balances growth and preservation, and improve the quality of life in the Planning Area through the creation of vibrant, thriving, safe, healthy, and pleasant communities. Because the WSAP is planning for future growth in the Planning Area, no actual development is being proposed at this time. Goals and policies from the Land Use Element and the Conservation and Open Space Element have been identified to help avoid potential construction impacts to agriculture and forestry resources during the implementation stage.

#### Land Use Element

**Goal LU 8:** A sustainable built environment

- **Policy LU 8.1.** Ensure that new development is located and designed to respect natural landforms and topography and protect native ecologies, wildlife, and open spaces.

**Conservation and Open Space Element**

**Goal COS 2:** Biological, natural, and open space resources are protected, conserved, and enhanced.

- **Policy COS 2.2.** Preserve Kenneth Hahn State Recreation Area and surrounding open spaces as valuable outdoor space for humans, animals, and plants.

### 5.2.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.2-1: Would the project 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? [AG-1]**

**No Impact.** The Planning Area is predominately designated as Urban and Built-Up Land (DOC 2022). One portion of the Ladera Heights, Park View, and Windsor Hills area is designated as Other Land, which means this land is not suitable as agricultural land and is surrounded on all sides by urban development. The portion designated Other Land includes the Inglewood Oil Field and Kenneth Hahn State Recreation Area (KHSRA). All other incorporated communities are not near any land designated farmland of importance. There are no land use or zoning changes that would convert farmland to nonagricultural use. There is no designated agricultural land in the Planning Area. Policy LU 8.1 and Policy COS 2.1 ensure that any open space in the Planning Area is protected. Therefore, no impact would occur and no mitigation is required.

**Impact 5.2-2: Would the project conflict with the 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])? [AG-2 and AG-3]**

**No Impact.** The Planning Area is in a developed urban environment and does not contain, nor is it in proximity to, areas defined or zoned for forest land or timberland production. As such, implementation of the WSAP would not conflict with existing zoning for forest land or timberland. The Planning Area is not in areas defined as forest land, timberland, or timberland production. No impact would occur and no mitigation is required.

**Impact 5.2-3: Would the project result in the loss of forest land or conversion of forest land to non-forest use? [AG-4]**

**No Impact**. Forests in the County are largely limited to mountain ranges in 3 of the 11 Planning Areas: Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. Forest land in the County is protected through the County's SEA Ordinance. Any projects in SEAs would be required to obtain a Conditional Use Permit that demonstrates compliance with the ordinance or includes the application of conditions of approval that would reduce impacts to forestland. Further, the Land Use Element and Conservation and Natural Resources Element of the General Plan include policies and implementation programs to preserve natural areas and open space found in the Planning Area. According to the County General Plan, none of the existing forest land in the County's jurisdiction overlaps with the Planning Area. The Planning Area is not in areas defined as forest land, timberland, or timberland production. The Planning Area is in a developed urban environment and does not contain areas defined as forest land. As such, implementation of the WSAP would have no significant impact as it relates to the loss of forest land or conversion of forest land to non-forest use. No mitigation is required.

**Impact 5.2-4: Would the project 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 non-forest use? [AG-5]**

**No Impact.** The WSAP would be a long-range policy document intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life in the Planning Area through the creation of vibrant, thriving, safe, healthy, and pleasant communities. There is no designated agricultural or forest land in the Planning Area. Policy LU 8.1 and Policy COS 2.1 ensure that KHSRA and surrounding open space in the Planning Area is protected. Proposed land use changes and zoning changes would not result in physical changes to existing agricultural areas or forest lands. Therefore, implementation of the WSAP would have a less-than-significant impact as it relates to resulting in 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 non-forest use. No impact would occur and no mitigation is required.

## 5.2.4 Cumulative Impacts

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself). The cumulative geographic study area used to assess potential cumulative agriculture and forestry impacts is Los Angeles County.

**Impact 5.2-5: Would the project have a significant cumulative contribution to the conversion of 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?**

**No Impact.** Over time, the County has seen a steady rate of conversion of agricultural lands to other uses. In the DOC's most recent report, the County saw the conversion of approximately 3,444 acres of land from agricultural to urban land uses, which include solar and water recharge projects (DOC 2016). It is unclear how many of these conversions occurred in the unincorporated areas of the county; however, given the number of acres that have been recently converted to urban uses, a significant cumulative impact exists with regard to the conversion of designated farmland to other uses. Although a significant cumulative impact regarding the conversion of important farmland to nonagricultural use exists within the County, the WSAP would not result in an incremental contribution to this significant cumulative impact. There is no designated important farmland found in the Planning Area. Future development would not result in the conversion of Prime Farmland to nonagricultural uses. As a result, the WSAP would make a less than cumulatively considerable contribution to a significant impact, and no cumulative impact would result.

**Impact 5.2-6: Would the project, when combined with other past, present, or reasonably foreseeable projects, conflict with the existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?**

**No Impact.** The WSAP could result in a cumulative impact on the zoning of forest land if an implementing project were to conflict with the zoning of forest land and occur in the same time frame or geography as similar projects on forest land. The County does not have existing zoning specific to forest use or timberland and does not have land use authority over development in national forests, such as Angeles National Forest and Los Padres National Forest, where most of the forest land in the county exists. Therefore, since the County has no existing zoning specific to forest land, and private projects are generally prohibited in National Forest land, no significant cumulative condition exists with respect to conflicts with zoning for forest land. The Planning Area is not in areas defined as forest land, timberland, or timberland production. Therefore, no significant cumulative impact exists to which the WSAP could contribute, and no cumulative impact would occur.

**Impact 5.2-7: Would the project, when combined with other past, present, or reasonably foreseeable projects, result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** The majority of land that is considered forest land is in Angeles National Forest and Los Padres National Forest. As described previously, the construction of new private residences in National Forest lands is prohibited by the Forest Reserve Act of 1891, and U.S. Forest Service land usually is not made available if the overall needs of an individual project proponent or business can be met on nonfederal lands. Therefore, it is unlikely that throughout the county, there is a significant cumulative condition with regard to the conversation of forest land. Additionally, the Planning Area is not in areas defined as forest land, timberland, or timberland production. Therefore, there is no significant cumulative condition to which the WSAP could contribute. The WSAP would result in no cumulative impact with respect to this criterion.

**Impact 5.2-8: Would the project, when combined with other past, present, or reasonably foreseeable projects, 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 non-forest use?**

**No Impact.** The WSAP includes policies and implementation programs to protect open space and ensure that future development protects and preserves those areas. Future redevelopment associated with the Project would not result in the conversion of Farmland or forest land to a nonagricultural use and would not substantially exacerbate the existing potential for redevelopment due to the existing land uses on-site and potential constraints for redevelopment. Therefore, the WSAP would have a less-than-significant cumulative impact that related to 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 non-forest use. Therefore, there is no significant cumulative condition to which the WSAP could contribute. The WSAP would result in no cumulative impact with respect to this criterion.

## 5.2.5 Level of Significance Before Mitigation

After implementation of regulatory requirements and standard conditions of approval, no impacts would occur.

## 5.2.6 Mitigation Measures

No mitigation measures required.

## 5.2.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to agriculture or forestry have been identified.

## 5.2.8 References

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# 5. Environmental Analysis
## AGRICULTURE AND FORESTRY RESOURCES

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# 5.3 AIR QUALITY

This section provides an analysis of potential local and regional impacts on air quality from future development facilitated by adoption of the Westside Area Plan (WSAP or Project), including those related to air quality plans and standards, criteria pollutants, sensitive receptors, and objectionable odors. This section provides context regarding air quality standards and local air quality, as well as relevant federal, State, and local regulations and programs.

This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. In this section, "emissions" refers to the actual quantity of pollutant measured in pounds per day (lbs./day), and "concentrations" refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million, parts per billion, or micrograms per cubic meter. This section focuses on criteria air pollutants and toxic air contaminants. Greenhouse gases (GHGs) are evaluated in Section 5.8, *Greenhouse Gas Emissions*, of this Draft Program Environmental Impact Report (PEIR). The analysis in this section is based on traffic modeling conducted for the proposed Project (see Appendix E). Criteria air pollutant emissions modeling is included in Appendix B, *Air Quality and Greenhouse Gas Emissions Modeling*. Cumulative impacts related to air quality are based on the regional boundaries of the South Coast Air Basin (SoCAB) and South Coast AQMD's Multiple Air Toxics Exposure Study mapping.

During the scoping period for the Draft PEIR, written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, included in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.3.1 Environmental Setting

### 5.3.1.1 AIR POLLUTANTS OF CONCERN

#### Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides ($NO_X$), sulfur dioxide ($SO_2$), coarse inhalable particulate matter ($PM_{10}$), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, CO, $SO_2$, nitrogen dioxide ($NO_2$), $PM_{10}$, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. VOC and $NO_X$ are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone ($O_3$) and $NO_2$ are the principal secondary pollutants.

Each of the primary and secondary criteria air pollutants and its known health effects are described below.

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend

to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB, the highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005; South Coast AQMD 2022; US EPA 2023a). The SoCAB is designated as being in attainment under the California AAQS and attainment (serious maintenance)[1] under the National AAQS (CARB 2024a).

- **Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for VOCs. However, because they contribute to the formation of $O_3$, South Coast AQMD has established a significance threshold (South Coast AQMD 2023a). The health effects for ozone are described later in this section.

- **Nitrogen Oxides ($NO_X$)** are a by-product of fuel combustion and contribute to the formation of ground-level $O_3$, $PM_{10}$, and $PM_{2.5}$. The two major forms of $NO_X$ are nitric oxide (NO) and nitrogen dioxide ($NO_2$). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of $NO_X$ produced by combustion is NO, but NO reacts quickly with oxygen to form $NO_2$, creating the mixture of NO and $NO_2$ commonly called $NO_X$. $NO_2$ is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, $NO_2$ is only potentially irritating. $NO_2$ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. $NO_2$ exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term $NO_2$ exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term $NO_2$ concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is designated in attainment (maintenance) under the National AAQS and attainment under the California AAQS (CARB 2024a).

- **Sulfur Dioxide ($SO_2$)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of $SO_2$. When sulfur dioxide forms sulfates ($SO_4$) in the atmosphere, together these pollutants are referred to as sulfur oxides ($SO_X$). Thus, $SO_2$ is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, $SO_2$ may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to $SO_2$, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are

[1] A maintenance area refers to a previously nonattainment area that has been redesignated to "maintenance" after it meets the standards and additional redesignation requirements in the Clean Air Act [Section 107(d)(3)(E)].

particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations, and when combined with particulates, $SO_2$ may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is designated as attainment under the California and National AAQS (CARB 2024a).

- **Suspended Particulate Matter ($PM_{10}$ and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or $PM_{10}$, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤0.01 millimeter). Inhalable fine particles, or $PM_{2.5}$, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤0.002.5 millimeter). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both $PM_{10}$ and $PM_{2.5}$ may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's (EPA) scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than $PM_{10}$ to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005, 2022). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.0001 millimeter) have human health implications because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2022). However, the EPA and the California Air Resources Board (CARB) have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen (CARB 1999, 2023d). Particulate matter can also cause environmental effects such as visibility impairment,[2] environmental damage,[3] and aesthetic damage[4] (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is a nonattainment area for $PM_{2.5}$ under California and National AAQS and a nonattainment area for $PM_{10}$ under the California AAQS (CARB 2024a).[5]

- **Ozone ($O_3$)** is a key ingredient of "smog" and is a gas that is formed when VOCs and $NO_X$, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. $O_3$ is a secondary criteria air pollutant. $O_3$ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. $O_3$ poses

[2] $PM_{2.5}$ is the main cause of reduced visibility (haze) in parts of the United States.

[3] Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

[4] Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

[5] CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for $PM_{10}$ to attainment for $PM_{10}$ under the National AAQS on March 25, 2010, because the SoCAB did not violate federal 24-hour $PM_{10}$ standards from 2004 to 2007. The EPA approved the State of California's request to redesignate the South Coast $PM_{10}$ nonattainment area to attainment of the $PM_{10}$ National AAQS, effective on July 26, 2013.

a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing $O_3$ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level $O_3$ also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. $O_3$ also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, $O_3$ harms sensitive vegetation during the growing season (South Coast AQMD 2005, 2022; US EPA 2023a). The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2024a).

- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005, 2022; US EPA 2023a). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the EPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.[6] As a result of these violations, the Los Angeles County portion of the SoCAB is designated as nonattainment under the National AAQS for lead (South Coast AQMD 2012; CARB 2024a). However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). Because emissions of lead are found only in projects that are permitted by South Coast AQMD, lead is not a pollutant of concern for the Project.

Table 5.3-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

[6] Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (South Coast AQMD 2012).

**Table 5.3-1 Criteria Air Pollutant Health Effects Summary**

| Pollutant | Health Effects | Examples of Sources |
|---|---|---|
| Carbon Monoxide (CO) | • Chest pain in heart patients<br>• Headaches, nausea<br>• Reduced mental alertness<br>• Death at very high levels | Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves |
| Ozone ($O_3$) | • Cough, chest tightness<br>• Difficulty taking a deep breath<br>• Worsened asthma symptoms<br>• Lung inflammation | Atmospheric reaction of organic gases with nitrogen oxides in sunlight |
| Nitrogen Dioxide ($NO_2$) | • Increased response to allergens<br>• Aggravation of respiratory illness | Same as carbon monoxide sources |
| Particulate Matter ($PM_{10}$ and $PM_{2.5}$) | • Hospitalizations for worsened heart diseases<br>• Emergency room visits for asthma<br>• Premature death | Cars and trucks (particularly diesels)<br>Fireplaces and woodstoves<br>Windblown dust from overlays, agriculture, and construction |
| Sulfur Dioxide ($SO_2$) | • Aggravation of respiratory disease (e.g., asthma and emphysema)<br>• Reduced lung function | Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes |
| Lead (Pb) | • Behavioral and learning disabilities in children<br>• Nervous system impairment | Contaminated soil |

Source: CARB 2024b.

## Toxic Air Contaminants

CARB has identified other air pollutants as TACs, which are pollutants that may cause serious, long-term effects. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (US EPA 2023b). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the Project being particulate matter from diesel-fueled engines.

### *Diesel Particulate Matter*

In 1998, CARB identified DPM as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute)

exposure can cause irritation and inflammatory systems and may exacerbate existing allergies and asthma systems (US EPA 2002).

Ambient air quality standards have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal government regulate the release of TACs. The proposed Project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD, the California AAQS adopted by CARB, and National AAQS adopted by the EPA. Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed Project are summarized in this section.

### 5.3.1.2 REGULATORY BACKGROUND

#### Federal and State

##### *Ambient Air Quality Standards*

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 CAA 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 CAA allows states to adopt more stringent standards or to include other pollution species. 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 National and California AAQS 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.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 5.3-2, *Ambient Air Quality Standards for Criteria Air Pollutants*. These pollutants are $O_3$, $NO_2$, CO, $SO_2$, $PM_{10}$, $PM_{2.5}$, and Pb. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

**Table 5.3-2 Ambient Air Quality Standards for Criteria Air Pollutants**

| Pollutant | Averaging Time | California Standard[1] | Federal Primary Standard[2] | Major Pollutant Sources |
|---|---|---|---|---|
| Ozone ($O_3$)[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 | |
| 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 ($PM_{2.5}$)[4] | 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 ($SO_4$)[5] | 24 hours | 25 µg/m$^3$ | * | Industrial processes. |
| Visibility-Reducing Particles | 8 hours | ExCo =0.23/km visibility of 10≥ miles | No Federal Standard | 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. |

**Table 5.3-2 Ambient Air Quality Standards for Criteria Air Pollutants**

| Pollutant | Averaging Time | California Standard[1] | Federal Primary Standard[2] | Major Pollutant Sources |
|---|---|---|---|---|
| Hydrogen Sulfide | 1 hour | 0.03 ppm | No Federal Standard | 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 hours | 0.01 ppm | No Federal Standard | Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) 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.
Notes: ppm: parts per million; $\mu g/m^3$: micrograms per cubic meter
* Standard has not been established for this pollutant/duration by this entity.
1 California standards for $O_3$, CO (except 8-hour Lake Tahoe), $SO_2$ (1 and 24 hour), $NO_2$, and particulate matter ($PM_{10}$, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2 National standards (other than $O_3$, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The $O_3$ standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For $PM_{10}$, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
3 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
4 On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour $PM_{10}$ standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
5 On June 2, 2010, a new 1-hour $SO_2$ standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

California has also adopted a host of other regulations that reduce criteria pollutant emissions:

- **Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces greenhouse gas emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.

- **Senate Bill (SB) 1078 and SB 107: Renewables Portfolio Standards.** A major component of California's Renewable Energy Program is the renewables portfolio standard established under SB 1078 (Sher) and SB 107 (Simitian). Under the renewables portfolio standard, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010.

- **Title 20 of California Code of Regulations (CCR): Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the California

Energy Commission 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 non–federally regulated appliances.

- **24 CCR, Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977.

- **24 CCR, Part 11: Green Building Standards Code.** Establishes 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.[7]

### *California Air Resources Board*

CARB is a part of the California Environmental Protection Agency and responsible for the coordination and administration of both federal and state air pollution control programs in California. In this capacity, CARB conducts research, sets the California AAQS (see Table 5.3-2), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), working closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from the EPA.

### *Nuisance Regulations*

Health and Safety Code Section 41700 states,

> ... a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

This section also applies to objectionable odors.

### *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 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 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to section 112(b) of the federal Clean Air Act (42 US Code Section 7412[b]) is a TAC. Under State law, the California Environmental

[7] The green building standards became mandatory in the 2010 edition of the code.

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 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.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10 Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.** Regulation generally restricting on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
- **13 CCR Section 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.** Regulations established to control emissions associated with diesel-powered TRUs.

## Regional

### *Air Quality Management Planning*

The South Coast AQMD is the agency responsible for improving air quality in the SoCAB and ensuring that the National and California AAQS are attained and maintained. South Coast AQMD is responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). The AQMP is a regional strategy plan to achieve air quality standards by examining emissions, looking at regional growth projections, and the impact of existing and proposed control measures to provide healthful air in the long-term. Since 1979, a number of AQMPs have been prepared.

The Clean Air Act requires CARB to develop a SIP that describes how an area will attain National AAQS. The AQMP provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the SIP. Areas are classified as attainment or nonattainment areas for a particular pollutant depending on whether they meet the AAQSs.

### *2022 AQMP*

South Coast AQMD adopted the 2022 AQMP on December 2, 2022, as an update to the 2016 AQMP. On October 1, 2015, the EPA strengthened the National AAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb) (2015 Ozone National AAQS). The SoCAB is currently classified as an "extreme" nonattainment for the 2015 Ozone National AAQS. Meeting the 2015 federal ozone standard requires reducing $NO_X$ emissions, the key pollutant that creates ozone, by 67 percent more than is required by adopted rules and regulations by 2037. The only way to achieve the required $NO_X$ reductions is through extensive use of zero emission (ZE) technologies across all stationary and mobile sources. South Coast AQMD's primary authority is over stationary sources which account for approximately 20 percent of $NO_X$ emissions. The overwhelming majority of $NO_X$ emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile sources that are mostly beyond the South Coast AQMD's control. The region will not meet the standard without significant federal action. In addition to federal action, the 2022 AQMP requires substantial reliance on future deployment of advanced technologies to meet the standard. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low-$NO_X$ technologies and (2) developing new ZE and ultra-low $NO_X$ technologies for use in cases where the technology is not currently available. South Coast AQMD is prioritizing distribution of incentive funding in environmental justice areas and seeking opportunities to focus benefits on the most disadvantaged communities (South Coast AQMD 2022).

### *South Coast AQMD $PM_{2.5}$ Redesignation Request and Maintenance Plan*

In 1997, the EPA adopted the 24-hour fine $PM_{2.5}$ standard of 65 μg/m$^3$. In 2006, this standard was lowered to a more health-protective level of 35 μg/m$^3$. The SoCAB is designated nonattainment for both the 65 μg/m$^3$ and 35 μg/m$^3$ 24-hour $PM_{2.5}$ standards (24-hour $PM_{2.5}$ standards). In 2020, monitored data demonstrated that the SoCAB attained both 24-hour $PM_{2.5}$ standards. The South Coast AQMD developed the "2021 Redesignation Request and Maintenance Plan" for the 1997 and 2006 24-hour $PM_{2.5}$ Standards for the SoCAB $PM_{2.5}$ Redesignation Request and Maintenance Plan, demonstrating that the SoCAB has met the requirements to be redesignated to attainment for the 24-hour $PM_{2.5}$ standards (South Coast AQMD 2021b).

### *Lead Implementation Plan*

In 2008, the EPA designated the Los Angeles County (County) portion of the SoCAB as a nonattainment area under the federal lead (Pb) classification because of 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 SoCAB, outside the County nonattainment area, remains in attainment of the new 2008 lead 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 submitted to the EPA for approval and was approved in March 2014.

### *Assembly Bill 617, Community Air Protection Program*

AB 617 (C. Garcia, Chapter 136, Statutes of 2017) requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. In response to AB 617, CARB established the Community Air Protection Program.

Air districts are required to host workshops to help identify disadvantaged communities disproportionately affected by poor air quality. Once the criteria for identifying the highest priority locations have been identified and the communities have been selected, new community monitoring systems are installed to track and monitor community-specific air pollution goals. In 2018 CARB prepared an air monitoring plan (Community Air Protection Blueprint) that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, the Blueprint is required to be updated every five years.

Under AB 617, CARB is also required to prepare a statewide strategy to reduce TACs and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology; adopt new rules requiring the latest best available retrofit control technology for all criteria pollutants for which an area has not achieved attainment of California AAQS; and provide uniform, statewide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the communities impacted by air pollution that CARB identifies.

### *South Coast AQMD Rules and Regulations*

All projects are subject to South Coast AQMD 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 three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US 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 445, Wood Burning Devices.** In general, the rule prohibits new developments from the installing wood-burning devices. This rule is intended to reduce the emission of particulate matter from such devices and applies to manufacturers and sellers of wood-burning devices, commercial sellers of firewood, and property owners and tenants that operate a wood-burning device.

- **Rule 1113, Architectural Coatings.** This rule serves to limit the VOC content of architectural coatings used on projects in the South Coast AQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast AQMD must comply with the current VOC standards in this rule.

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

- **Rule 1166, Volatile Organic Compound Emissions from Decontaminated Soil.** Under this rule, an excavation plan is required, and excavation operations are required to be monitored for VOC concentrations.

- **Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants,** to minimize the amount of off-site fugitive dust emissions containing TACs by reducing particulate emissions in the ambient air as a result of earthmoving activities, including excavating, grading, handling, treating, stockpiling, transferring, and removing soil that contains applicable TACs. Components of the fugitive dust control plan are required to include the following measures: fencing that is a minimum of six feet tall and at least as tall as the height of the tallest stockpile, with a windscreen with a porosity of 50 $\pm$ 5 percent; monitoring; notification; signage; and recordkeeping.

- **Rule 1113, Architectural Coatings.** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** This rule states that an owner or operator of any demolition or renovation activity is required to have an asbestos study performed prior to demolition and to provide notification to South Coast AQMD prior to commencing demolition activities.

### *Southern California Association of Governments' Connect SoCal*

Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial counties, and addresses regional issues related to

transportation, the economy, community development and the environment. SCAG is the federally designated metropolitan planning organization (MPO) for the majority of the Southern California region and is the largest MPO in the nation.

Pursuant to Health and Safety Code Section 40460, SCAG is responsible for preparing and approving the portions of the AQMP related to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies. SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan. For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

## Local

### *Los Angeles County Green Zones Program*

The County Green Zones Program promotes 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 through revisions in Title 22 of the County Code (DRP 2022). The Green Zones Program seeks to enhance protection of sensitive uses, where such uses are adjacent to certain industrial and manufacturing uses, by developing Green Zone Districts that identify existing land use patterns with the potential to adversely affect sensitive uses. The County has identified 11 Green Zone Districts, which must adhere to additional development standards, New Sensitive Uses, which provide protection to sensitive uses that locate near existing industrial uses. Additionally, the Green Zones Program includes revisions regarding Recycling and Waste Management that would provide a better-regulated and -updated process in alignment with State regulation to permit new types of recycling-processing facilities using newer technologies to meet State requirements. It also includes revisions to further define and provide specific regulations for automobile dismantling yards, pallet yards, recycling collection facilities, recycling processing facilities, and organic and solid waste facilities. While revisions to Title 22 would result in more locations where recycling and waste management facilities could be permitted, these facilities will require a discretionary review through a Conditional Use Permit (CUP) to be established as a primary use, and the requirements include restrictions on automobile dismantling yards, pallet yards, recycling collection facilities, recycling processing facilities, and organic and solid waste facilities in environmentally sensitive areas, including Hillside Management Areas,

Significant Ecological Areas, and Very High Fire Hazard Severity Zones. Additionally, in-vessel organic waste facilities are prohibited in Agricultural Resource Areas. The Westside Planning Area (Planning Area) would not be affected by Element 1, Green Zone Districts, of the proposed program. However, the three remaining elements of the proposed program, New Sensitive Uses, Recycling and Waste Management Revisions, and Storage Enclosures for Recycling and Solid Waste Revisions, would affect all unincorporated areas in the Westside Planning Area.

### *Los Angeles County General Plan*

The County General Plan (General Plan) was adopted by the County Board of Supervisors on October 6, 2015. The General Plan includes goals and policies in the Air Quality Element to reduce air quality impacts. Goals and policies that apply to the Project include:

**Goal AQ 1:** Protection from exposure to harmful air pollutants.

- **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 volatile organic compound (VOC) emitting materials.
- **Policy AQ 1.3.** Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.
- **Policy AQ 1.4.** Work with local air quality management districts to publicize air quality warnings, and to track potential sources of airborne toxics from identified mobile and stationary sources.

**Goal AQ 2:** The reduction of air pollution and mobile source emissions through coordinated land use, transportation and air quality planning.

- **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 2.2.** Participate in, and effectively coordinate the development and implementation of community and regional air quality programs.
- **Policy AQ 2.3.** Support the conservation of natural resources and vegetation to reduce and mitigate air pollution impacts.
- **Policy AQ 2.4.** Coordinate with different agencies to minimize fugitive dust from different sources, activities, and uses.

**Goal AQ 3:** Implementation of plans and programs to address the impacts of climate change.

- **Policy AQ 3.1.** Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that the County reaches its climate change and greenhouse gas emission reduction goals.
- **Policy AQ 3.2.** Reduce energy consumption in County operations by 20 percent by 2015.
- **Policy AQ 3.3.** Reduce water consumption in County operations.
- **Policy AQ 3.4.** Participate in local, regional and state programs to reduce greenhouse gas emissions.
- **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.
- **Policy AQ 3.7.** Support and expand urban forest programs within the unincorporated areas.
- **Policy AQ 3.8.** Develop, implement, and maintain countywide climate change adaptation strategies to ensure that the community and public services are resilient to climate change impacts.

### *Baldwin Hills Community Standards District*

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021, Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment, proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

## 5.3.1.3 EXISTING ENVIRONMENTAL CONDITIONS

The plan area is in the SoCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The region lies in the semi-permanent 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 (South Coast AQMD 2005).

## Meteorology

### *Temperature and Precipitation*

The annual average temperature varies little throughout the SoCAB, 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 station nearest to the proposed plan area with temperature data is the Culver City Monitoring Station (ID 042214). The average low is reported at 45.3 °F in January, and the average high is 79.0 °F in August (WRCC 2024).

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October 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 13.15 inches per year in the Planning Area (WRCC 2024).

### *Humidity*

Although the SoCAB has a semiarid climate, the air near the Earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds. Periods of heavy fog are frequent, given the air basin's location along the coast. 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 SoCAB (South Coast AQMD 1993).

### *Wind*

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and 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 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 SoCAB 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 inhibit the eastward transport and diffusion of pollutants. Air quality in the SoCAB 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 (South Coast AQMD 2005).

### *Inversions*

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions[8] control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion (sinking air from high pressure systems) and the radiation inversion (cooling of the earth's surface by radiation). The height of the base of the inversion at any given time is known as the "mixing height." 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 air basin (South Coast AQMD 2005).

## SoCAB Nonattainment Areas

The attainment status for the SoCAB is shown in Table 5.3-3, *Attainment Status of Criteria Air Pollutants in the South Coast Air Basin*.

**Table 5.3-3 Attainment Status of Criteria Air Pollutants in the South Coast Air Basin**

| Pollutant | State | Federal |
|---|---|---|
| Ozone – 1-hour | Extreme Nonattainment | No Federal Standard |
| Ozone – 8-hour | Extreme Nonattainment | Extreme Nonattainment |
| $PM_{10}$ | Serious Nonattainment | Attainment |
| $PM_{2.5}$ | Nonattainment | Nonattainment[1] |
| CO | Attainment | Attainment |
| $NO_2$ | Attainment | Attainment/Maintenance |
| $SO_2$ | Attainment | Attainment |
| Lead | Attainment | Nonattainment (Los Angeles County only)[2] |
| All others | Attainment/Unclassified | Attainment/Unclassified |

Source: CARB 2024a.

1 The SoCAB is pending a resignation request from nonattainment to attainment for the 24-hour federal $PM_{2.5}$ standards. The *2021* $PM_{2.5}$ *Redesignation Request and Maintenance Plan* demonstrates that the SoCAB meets the requirements of the CAA to allow US EPA to redesignate the SoCAB to attainment for the 65 µg/m$^3$ and 35 µg/m$^3$ 24-hour $PM_{2.5}$ standards. CARB has reviewed and adopted the *2021* $PM_{2.5}$ *Redesignation Request and Maintenance Plan* to the US EPA as a revision to the California State Implementation Plan (SIP) (CARB 2021).

2 In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new 2008 federal AAQS as a result of large industrial emitters. Remaining areas for lead in the SoCAB are unclassified. However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). CARB's SIP revision was submitted to the EPA for approval.

## Multiple Air Toxics Exposure Study V

MATES is a monitoring and evaluation study on existing ambient concentrations of TACs and the potential health risks from air toxics in the SoCAB. In April 2021, South Coast AQMD released the latest update to the MATES study, MATES V. The first MATES analysis, MATES I, began in 1986 but was limited because of the technology available at the time. Conducted in 1998, MATES II was the first MATES iteration to include a

8 Air temperature typically decreases with an increase in altitude. In a temperature inversion, the normal temperature pattern of the atmosphere is reversed and the air temperature increases rather than decreases with height above mean sea level.

comprehensive monitoring program, an air toxics emissions inventory, and a modeling component. MATES III was conducted in 2004 to 2006, with MATES IV following in 2012 to 2013.

MATES V uses measurements taken during 2018 and 2019, with a comprehensive modeling analysis and emissions inventory based on 2018 data. The previous MATES studies quantified the cancer risks based on the inhalation pathway only. MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been reexamined using current Office of Environmental Health Hazards Assessment and California Environmental Protection Agency risk assessment methodologies and modern statistical methods to examine the trends over time.

The MATES V study showed that cancer risk in the SoCAB decreased to 454 in a million from 997 in a million in the MATES IV study. Overall, air toxics cancer risk in the SoCAB decreased by 54 percent since 2012 when MATES IV was conducted. MATES V showed the highest risk locations near the Los Angeles International Airport and the Ports of Long Beach and Los Angeles. DPM continues to be the major contributor to air toxics cancer risk (approximately 72 percent of the total cancer risk). Goods movement and transportation corridors have the highest cancer risk. Transportation sources account for 88 percent of carcinogenic air toxics emissions, and the remainder is from stationary sources, which include large industrial operations such as refineries and power plants as well as smaller businesses such as gas stations and chrome-plating facilities. (South Coast AQMD 2021a).

Figure 5.3-1, *South Coast AQMD MATES V Cancer Risk in the Planning Area*, identifies that the maximum cancer risk in the plan area is 461 per million, which is higher than 50 percent of the South Coast AQMD population (South Coast AQMD 2024a). The primary factor contributing to this risk is DPM.

## Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the Planning Area are best documented by measurements taken by the South Coast AQMD. The project site is located within Source Receptor Areas (SRA) 1, Central LA, and SRA 2, Northwest Coastal LA County. The air quality monitoring station closest to the Planning Area is the West Los Angeles–VA Hospital Monitoring Station, which is one of 31 monitoring stations South Coast AQMD operates and maintains within the SoCAB. Data from this station includes $O_3$ and $NO_2$ and is summarized in Table 5.3-4, *Ambient Air Quality Monitoring Summary*. Data from the Los Angeles-Westchester Parkway Monitoring Station has been used to supplement $PM_{10}$, and data from the Compton-700 North Bullis Road Monitoring Station has been used to supplement $PM_{2.5}$. The data show that the area regularly exceeds the State and federal one-hour and eight-hour $O_3$ standards within the last five recorded years. Additionally, the area has regularly exceeded the State $PM_{10}$ standards and federal $PM_{2.5}$ standard.

**Table 5.3-4 Ambient Air Quality Monitoring Summary**

| Pollutant/Standard | Number of Days Threshold Were Exceeded and Maximum Levels During Such Violations[1,2] | | | | |
|---|---|---|---|---|---|
| | 2018 | 2019 | 2020 | 2021 | 2022 |
| **Ozone ($O_3$)** | | | | | |
| State 1-Hour ≥ 0.09 ppm (days exceed threshold) | 0 | 0 | 6 | 1 | 0 |
| State & Federal 8-hour ≥ 0.070 ppm (days exceed threshold) | 2 | 1 | 8 | 1 | 0 |
| Max. 1-Hour Conc. (ppm) | 0.094 | 0.086 | 0.134 | 0.095 | 0.081 |
| Max. 8-Hour Conc. (ppm) | 0.073 | 0.075 | 0.092 | 0.082 | 0.070 |
| **Nitrogen Dioxide ($NO_2$)** | | | | | |
| State 1-Hour ≥ 0.18 ppm (days exceed threshold) | 0 | 0 | 0 | 0 | 0 |
| Federal 1-Hour ≥ 0.100 ppm (days exceed threshold) | 0 | 0 | 0 | 0 | 0 |
| Max. 1-Hour Conc. (ppb) | 0.0647 | 0.0488 | 0.0766 | 0.0606 | 0.0514 |
| **Coarse Particulates ($PM_{10}$)** | | | | | |
| State 24-Hour > 50 µg/m$^3$ (days exceed threshold) | 0 | 2 | 1 | 0 | * |
| Federal 24-Hour > 150 µg/m$^3$ (days exceed threshold) | 0 | 0 | 0 | 0 | * |
| Max. 24-Hour Conc. (µg/m$^3$) | 45.3 | 62.1 | 55.6 | 33.3 | * |
| **Fine Particulates ($PM_{2.5}$)** | | | | | |
| Federal 24-Hour > 35 µg/m$^3$ (days exceed threshold) | 2 | 1 | 19 | 12 | 6 |
| Max. 24-Hour Conc. (µg/m$^3$) | 49.4 | 39.5 | 67.5 | 102.1 | 52.8 |

Source: CARB 2024c.
Notes: ppm = parts per million; ppb = parts per billion; µg/m$^3$ = micrograms per cubic meter; * = Data not available
[1] Data for $O_3$ and $NO_2$ obtained from the West Los Angeles – VA Hospital Monitoring Station. Data for $PM_{10}$ and $PM_{2.5}$ obtained from the Los Angeles-Westchester Parkway Monitoring Station and Compton-700 North Bullis Road Monitoring Station, respectively.
[2] Most recent data available as of February 2024.

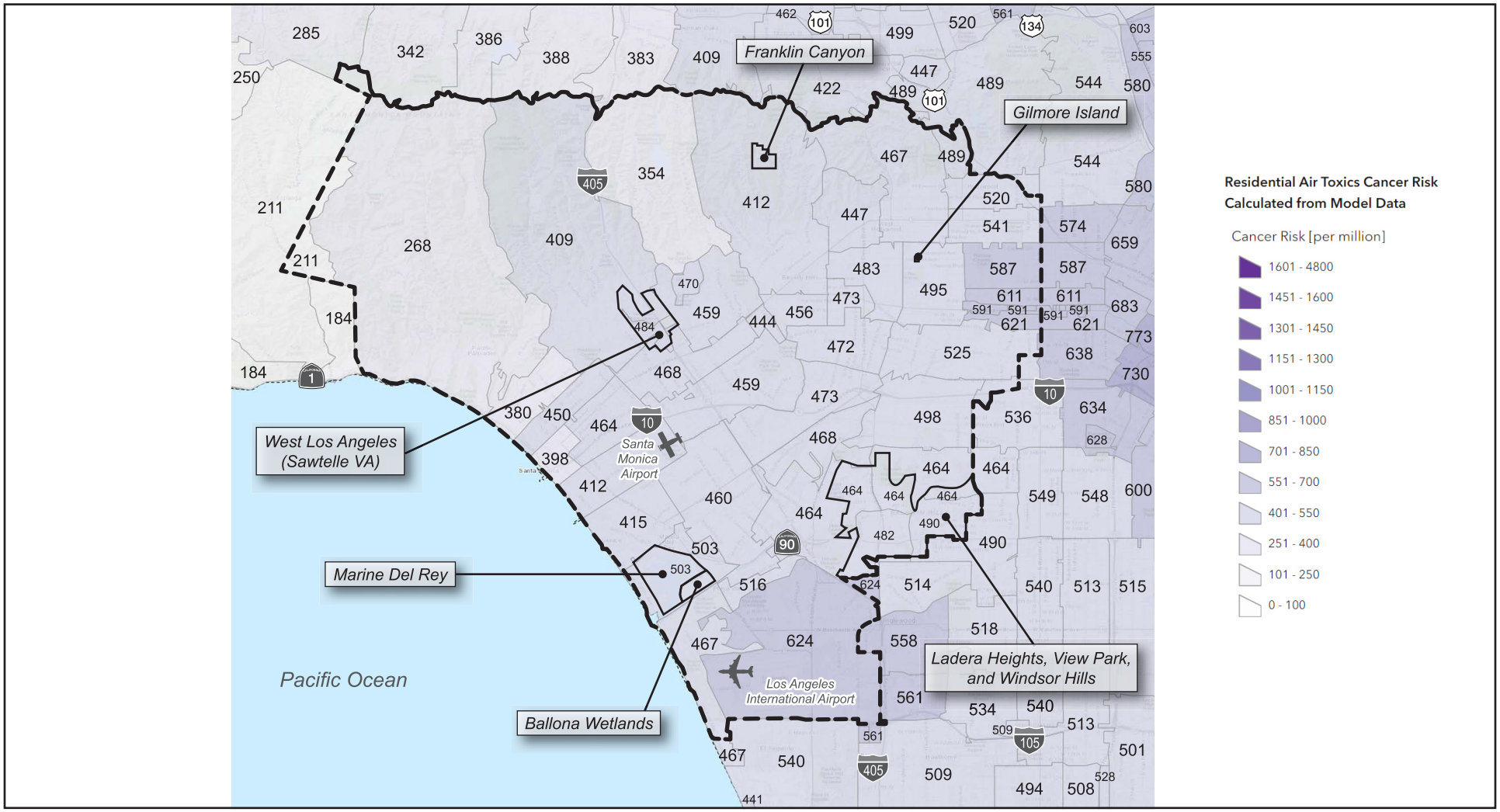
## Existing Emissions

The existing land uses in the WSAP consist primarily of residential uses and involve a mix of commercial uses, educational uses, office and industrial spaces, and open space. These operations currently generate criteria air pollutant emissions from area sources (e.g., consumer cleaning products, landscaping equipment, and VOC emissions from paints), energy consumption (e.g., natural gas used for cooking, heating, etc.), and mobile sources (employee and vendor vehicle trips).

## Sensitive Receptors

Some land uses are considered more sensitive to air pollution (i.e., TACs) 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.

## Figure 5.3-1 - South Coast AQMD MATES V Cancer Risk in the Project




Source: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CCancer-Risk

# 5. Environmental Analysis
## AIR QUALITY

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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 pollutants. 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 workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population.

## 5.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.

AQ-2 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.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

### 5.3.2.1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

#### Regional Emissions

South Coast AQMD has established thresholds of significance for air quality for construction activities and project operation in the SoCAB, as shown in Table 5.3-5, *South Coast AQMD Significance Thresholds*. The table lists thresholds that are applicable for all projects uniformly, regardless of size or scope. As discussed in Section 5.3.1.1, there is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM. However, because the EPA and CARB have not adopted AAQS to regulate ultrafine particulate matter, South Coast AQMD has not developed thresholds for it.

**Table 5.3-5 South Coast AQMD Significance Thresholds**

| Air Pollutant | Construction Phase | Operational Phase |
|---|---|---|
| Volatile Organic Compounds (VOC) | 75 lbs./day | 55 lbs./day |
| Carbon Monoxide (CO) | 550 lbs./day | 550 lbs./day |
| Nitrogen Oxides ($NO_X$) | 100 lbs./day | 55 lbs./day |
| Sulfur Oxides ($SO_X$) | 150 lbs./day | 150 lbs./day |
| Coarse Particulates ($PM_{10}$) | 150 lbs./day | 150 lbs./day |
| Fine Particulates ($PM_{2.5}$) | 55 lbs./day | 55 lbs./day |

Source: South Coast AQMD 2023a.

### *Health Outcomes Associated with the AQMD Regional Significance Thresholds*

Projects that exceed the AQMD's regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

- Increases cancer risk ($PM_{2.5}$, TACs)
- Aggravates respiratory disease ($O_3$, $PM_{2.5}$)
- Increases bronchitis ($O_3$, $PM_{2.5}$)
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath ($O_3$)
- Reduces resistance to infections and increases fatigue ($O_3$)
- Reduces lung growth in children ($PM_{2.5}$)
- Contributes to heart disease and heart attacks ($PM_{2.5}$)
- Contributes to premature death ($O_3$, $PM_{2.5}$)
- Contributes to lower birth weight in newborns ($PM_{2.5}$) (South Coast AQMD 2015a)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of $PM_{2.5}$ is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's health study, found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 5.3-5 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SoCAB. These thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-

based federal AAQS. 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 previously. Projects that do not exceed the South Coast AQMD regional significance thresholds in Table 5.3-5 would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels in Table 5.3-5, those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to elevating health effects associated with these criteria air pollutants. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 5.3-5, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment, because mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch"). South Coast AQMD currently does not have methodologies that would provide the County with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.[9] Ozone concentrations are dependent on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, and the absence of modeling tools that could provide statistically valid data and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects, it is not possible to link specific health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

## 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 parts per million (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 AAQSs is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because

[9] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch") in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in Friant Ranch by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects within the South Coast AQMD region.

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 SoCAB and the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.[10] As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in years before the 2007 redesignation were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact (BAAQMD 2023).[11]

### Localized Significance Thresholds

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 5.3-6, *South Coast AQMD Localized Significance Thresholds*. Emissions of $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS.

[10] The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

[11] The CO hotspot analysis refers to the modeling conducted by the Bay Area Air Quality Management District for its CEQA Guidelines because it is based on newer data and considers the improvement in mobile-source CO emissions. Although meteorological conditions in the Bay Area differ from those in the Southern California region, the modeling conducted by BAAQMD demonstrates that the net increase in peak hour traffic volumes at an intersection in a single hour would need to be substantial. This finding is consistent with the CO hotspot analysis South Coast AQMD prepared as part of its 2003 AQMP to provide support in seeking CO attainment for the SoCAB. Based on the analysis prepared by South Coast AQMD, no CO hotspots were predicted for the SoCAB. As noted in the preceding footnote, the analysis included some of Los Angeles' busiest intersections, with daily traffic volumes of 100,000 or more peak hour vehicle trips operating at LOS E and F (South Coast AQMD 2003).

**Table 5.3-6 South Coast AQMD Localized Significance Thresholds**

| Air Pollutant (Relevant AAQS) | Concentration |
|---|---|
| 1-Hour CO Standard (CAAQS) | 20 ppm |
| 8-Hour CO Standard (CAAQS) | 9.0 ppm |
| 1-Hour $NO_2$ Standard (CAAQS) | 0.18 ppm |
| Annual $NO_2$ Standard (CAAQS) | 0.03 ppm |
| 24-Hour $PM_{10}$ Standard – Construction (South Coast AQMD)[1] | 10.4 µg/m$^3$ |
| 24-Hour $PM_{2.5}$ Standard – Construction (South Coast AQMD)[1] | 10.4 µg/m$^3$ |
| 24-Hour $PM_{10}$ Standard – Operation (South Coast AQMD)[1] | 2.5 µg/m$^3$ |
| 24-Hour $PM_{2.5}$ Standard – Operation (South Coast AQMD)[1] | 2.5 µg/m$^3$ |
| Annual Average $PM_{10}$ Standard (South Coast AQMD)[1] | 1.0 µg/m$^3$ |

Source: South Coast AQMD 2023a.
Notes: ppm – parts per million; µg/m$^3$ – micrograms per cubic meter
[1] Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for $PM_{10}$ and $PM_{2.5}$, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

To assist lead agencies, South Coast AQMD developed screening-level LSTs to back-calculate the mass amount (pounds per day) of emissions generated on-site that would trigger the levels shown in Table 5.3-6 for projects under five acres. These "screening-level" LST tables are the LSTs for all projects of five acres and less and are based on emissions over an 8-hour period; however, they can be used as screening criteria for larger projects to determine whether or not dispersion modeling may be required.

## Health Risk

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 5.3-7, *South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for operation of a project. The type of land uses that typically generate substantial quantities of criteria air pollutants and TACs from operations include industrial (stationary sources) and warehousing (truck idling) land uses (CARB 2005). Thus, these thresholds are typically applied to new industrial projects only. Additionally, 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).

**Table 5.3-7 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds**

| | |
|---|---|
| Maximum Incremental Cancer Risk (Project-Level) | ≥ 10 in 1 million |
| Cancer Burden (in areas ≥ 1 in 1 million) | > 0.5 excess cancer cases |
| Hazard Index (project increment) | ≥ 1.0 |

Source: South Coast AQMD 2023a.

## 5.3.3 Environmental Impacts

### 5.3.3.1 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 future development that would be accommodated by the Project. South Coast AQMD's *CEQA Air Quality Handbook* (Handbook) and updates on its website are intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs that were used in this analysis.

#### Criteria Air Pollutant Emissions

Air pollutant emissions are calculated using CalEEMod, version 2022.1 (CAPCOA 2022). CalEEMod compiles an emissions inventory of construction (fugitive dust, off-gas emissions, on-road emissions, and off-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal (annual only), and indirect emissions from water/wastewater (annual only). Criteria air pollutant emissions modeling is included in Appendix B of this Draft PEIR. Emissions of the Project are compared to thresholds of significance for individual projects, as shown in Table 5.3-5, using the South Coast AQMD Handbook. The following is a summary of the assumptions used for the Project's operational phase emissions modeling.

##### *Operational Phase*

- **Transportation.** The primary source of mobile-source emissions is from the combustion of fuel (i.e., gasoline and diesel). Project-related on-road emissions are based on year 2045 emission rates for the Project's buildout year. Transportation modeling is provided by Fehr and Peers using the SCAG 2016 RTP/SCS model, for buildout in Year 2045. VMT is modeled using emissions factors in CARB's EMFAC2021 Version 1.0.3, for the Los Angeles County, South Coast Air Basin subarea.

- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed net increase in dwelling units and retail square footage.

- **Energy.** The California Emissions Estimator Model (CalEEMod) Version 2022.1 default energy (i.e., electricity and natural gas) rates for nonresidential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019. CalEEMod default energy rates for residential land uses, which are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast and the 2019 Residential Appliance Saturation Survey (RASS), are used to quantify GHG emissions from energy use (i.e., natural gas and electricity). Use of the CalEEMod default energy rates results in conservative estimates compared to the recently adopted 2022 Building Energy Efficiency Standards because the commercial forecast is based on the energy demand per square foot of building space, land use subtype, and end use for the year 2019. It is anticipated new buildings under the 2022 Standards would generally result in lower electricity use.

### 5.3.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.1.** Focus growth and the development of new commercial and housing as infill and re-use of commercial corridors and centers, while supporting current businesses and preserving character of existing residential neighborhoods, parklands, and open spaces.

**Goal LU 3:** A community of distinct and livable places.

- **Policy LU 3.1.** Foster a land use pattern that brings everyday needs and amenities within walking distance of residential neighborhoods by encouraging neighborhood-scale retail and commercial uses adjacent to existing residential.
- **Policy LU 3.7.** Incentivize the inclusion of gathering places in commercial, mixed-use, and multifamily residential projects.
- **Policy LU 3.8.** Require new development along major thoroughfares and at the edges of commercial centers to be located and scaled to provide transitions in building height and bulk, consistent with the character of adjacent low-scale neighborhoods.

**Goal LU 4:** A diversity of land uses providing for community needs.

- **Policy LU 4.3.** Encourage commercial uses that serve and are accessible to adjoining residential neighborhoods.

**Goal LU 5:** Quality residential neighborhoods that are great places to live.

- **Policy LU 5.2.** Encourage the development of small-scale local-serving and community-gathering uses within walking distance of residential neighborhoods.

**Goal LU 6:** Vital and active commercial and mixed-use districts serving residents and visitors to the community.

- **Policy LU 6.3.** Encourage the redevelopment of existing multi-tenant commercial projects as mixed-use community-oriented centers, increasing the number of residents in proximity to retail and commercial uses, enhancing their economic vitality.
- **Policy LU 6.7.** Encourage the development of multi-modal transportation hubs within larger commercial and mixed-use centers.

**Goal LU 8:** A sustainable built environment.

- **Policy LU 8.3.** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources; reduce pollution and greenhouse gas emissions; and employ other sustainable measures (e.g., LEED, Living Building Challenge).

- **Policy LU 8.4.** Support private development that exceeds minimum site landscaping requirements reduces the heat island effect by incorporating green roofs and decks, durable awnings, increased tree canopy in lots not covered by buildings, bioswales and similar improvements

- **Policy LU 8.5.** Incorporate sustainable landscaping and water management practices in parklands, medians and along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.).

**Goal LU 9:** A safe and built environment and infrastructure.

- **Policy LU 9.1.** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).

- **Policy LU 9.2.** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation as necessary to protect adjoining neighborhoods and uses, while still operational as necessary to protect adjoining neighborhoods and uses.

**Goal LU 12 (Ladera Center):** A revitalized and pedestrian-oriented mixed-use center providing services accessible to residents of adjoining neighborhoods and opportunities for new housing development, expanding the customer base for local businesses.

- **Policy LU 12.1.** Facilitate infill and new development of retail commercial and office uses integrated with housing on the upper levels or to the rear of commercial buildings.

- **Policy LU 12.2.** Promote the inclusion of landscape improvements, plazas, and other amenities and require buildings to be oriented and designed to contribute to an active pedestrian environment.

**Goal LU 13 (Wateridge Business Center):** Development of housing as infill on existing parking lots and long-term replacement of existing buildings and parking structures warranted by marketplace changes.

- **Policy LU 13.5.** Encourage the development of a multi-modal transportation hub independent of or in concert with infill development of the Slauson-Fairfax Home Depot Center.

**Goal LU 14 (Slauson-Fairfax/Home Depot Center):** Long-term intensification and development as a pedestrian-oriented mixed-use center incorporating housing with commercial uses.

- **Policy LU 14.6.** Encourage the development of a multi-modal transportation hub independent of or in concert with infill development of the Wateridge Center.

**Goal LU 20 (Leimert Park Adjacent):** Concentration of commercial and residential uses providing continuity with properties developed along Crenshaw Boulevard adjacent to the Metro Transit Station.

- **Policy LU 20.2.** Promote development densities/intensities that encourage transit use by residents and business customers.

### Mobility Element

**Goal M 1:** A safe, efficient, and accessible transportation network for all Westside communities.

- **Policy M 1.3.** Work with LA Metro and other transit agencies (such as Culver City Bus, LADOT, LADPW The Link, Big Blue Bus, etc.) to improve the reliability and safety; and provide more modes of transit service tailored to the needs of residents.

- **Policy M 1.6.** Prioritize the upgrading of pedestrian infrastructure to align with federal, state, and local design guidance and ADA accessibility standards to ensure accessibility for vulnerable users.

- **Policy M 1.7.** Improve safety for all modes of transportation on public rights-of-way and manage traffic operation and controls to ensure safe travel by pedestrians and bicyclists.

**Goal M 3:** Improved access to reliable, safe, and high-quality transit service.

- **Policy M 3.1.** Promote the use of transit by strategically orienting new developments around major transit stops and high-quality transit corridors[12]. Apply the Los Angeles County Transit Oriented District (TOD) Design Guideline to new projects and emphasize design elements that facilitate transit use, including pedestrian walkways, bus plazas, and similar features.

- **Policy M 3.2.** Conduct a feasibility study to extend the Link: the Baldwin Hills Parklands shuttle to Marina del Rey and Ballona Wetlands through Ladera Heights, View Park and Windsor Hills.

- **Policy M 3.3.** Encourage convenient and safe transit, pedestrian, and bicycle linkages to/from transit service and mobility hubs to facilitate first/last-mile connections to Metro K Line stations, including Hyde Park, Leimert Park, and Martin Luther King Jr stations.

**Goal M 4:** Pedestrian and bicycle infrastructure is safe, connected, and comfortable for users of all ages and abilities.

- **Policy M 4.1.** Provide continuous pedestrian access along major streets by completing existing sidewalk infrastructure where gaps exist, such as La Brea Avenue between Slauson Avenue and Obama Boulevard, and Overhill Drive between Slauson Avenue and La Brea Avenue.

[12] According to Section 21064.3 of Public Resources Code, a major transit stop means a site containing any of the following: (a) An existing rail or bus rapid transit station; (b) A ferry terminal served by either a bus or rail transit service; or (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. According to Section 21155 of Public Resources Code, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

- **Policy M 4.2.** Enhance pedestrian crossing efficiency and safety at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive and intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Potential safety measures include pedestrian bridges, pedestrian signal phases, and high-visible crosswalks, pedestrian head starts, raised crossings, curb extensions, protected intersections etc.

- **Policy M 4.3.** Evaluate hotspots of bike-involved collisions (such as Slauson Avenue and La Brea Avenue) and implement safety measures for new bicycle facilities when updating the Los Angeles County Bicycle Master Plan.

- **Policy M 4.4.** Continue to build out and expand the existing trail and bicycle network in the community, connecting to parks and recreational areas, neighborhood commercial corridors, and other community destinations.

- **Policy M 4.5.** Fill in the existing bicycle network gap between the eastern and southern parts of Ladera Heights, View Park and Windsor Hills, as well as between the community and adjacent bicycle networks in Culver City and Leimert Park.

- **Policy M 4.7.** Expand the existing trail network by building safer pedestrian crossing infrastructure and adding signage and wayfinding between parks. Improve pedestrian connections between existing sidewalk and trail infrastructure in the community with future uses on the site of the Inglewood Oil Field.

- **Policy M 4.8.** Provide safe and continuous pedestrian networks that are mindful of user, roadway, and community characteristics through improvements to existing pedestrian areas.

- **Policy M 4.9.** Establish pedestrian and bicycle pathways connecting residential neighborhoods to redeveloped commercial corridors (Slauson Avenue and 54th Street) to promote non-auto travel for short trips.

- **Policy M 4.12.** Explore planning and constructing a Complete Street[13] along 54th Street that creates a neighborhood-friendly space lined with shops, restaurants, cafes, and other commercial establishments.

**Implementation Program MI 4.** Seek funding and implement multimodal infrastructure projects that promote Complete Streets along 54th Street, coordinating efforts with City of Los Angeles in places where the County shares authority of traffic control and maintenance of roadways.

**Implementation Program MI 5.** Conduct a feasibility study to assess the viability of extending the Link–Baldwin Hills Parklands shuttle. Evaluate potential ridership, infrastructure requirements and operational considerations. Engage with local communities and relevant stakeholders to gather input.

[13] Complete Streets are streets designed and operated to enable safe use and support mobility for all users. Those include people of all ages and abilities, regardless of whether they are traveling as drivers, pedestrians, bicyclists, public transportation riders, or movers of commercial goods.

**Implementation Program MI 8**. Develop Community Pedestrian Plans for Ladera Heights, View Park-Windsor Hills, and West Fox Hills communities for inclusion in Step-by-Step Los Angeles County: Pedestrian Plans for Unincorporated Communities with the aim of promoting healthy and active lifestyles. Include following study items:

- Explore mobility programs to increase transit access for underserved communities and vulnerable users, focusing on addressing walking challenges along steep streets, especially for seniors and people with disabilities.
- Evaluate the feasibility of a pedestrian bridge at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive to enhance pedestrian safety and community connections.
- Conduct a walk audit with community members and stakeholders along Slauson Avenue, Overhill Drive, La Brea Avenue, La Cienega Boulevard, Centinela Avenue, and Angeles Vista Boulevard to identify intersections for potential improvements to pedestrian facilities. Focus on intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Identify locations to improve crosswalk design features, such as crosswalk markings, curb extensions, and median islands.
- Conduct safety studies at intersections identified from the walk audit mentioned above and consider signal timing modifications to enhance safety for people crossing with lower mobility speeds, including youth, seniors, and the disabled. Potential signal timing improvements includes increased crossing time, Leading Pedestrian Intervals (LPI), protected turns, etc.

### Conservation and Open Space Element

**Goal COS 4:** Resources are conserved and infrastructure is adapted to improve resilience and minimize contributions to climate change.

- **Policy COS 4.1.** Encourage community members and existing developments to upgrade to water conserving mechanisms such as stormwater capture systems, graywater systems, water-efficient appliances, and drought-tolerant landscape planting.
- **Policy COS 4.2.** Expand opportunities for EV charging at existing public facilities such as Ladera Park and Kenneth Hahn State Recreation Area.

## 5.3.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.3-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan? [Threshold AQ-1]**

**Less Than Significant Impact.** Due to the nature of the WSAP as a planning document, approval of the WSAP would not directly result in development of the land uses, and therefore would not directly result in generation of criteria pollutant emissions. However, future development following the adoption of the WSAP may result in generation of criteria pollutant emissions.

A consistency determination with the AQMP 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 the proposed project under consideration 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 in the AQMP.

## Consistency with Regional Planning Projections

The regional emissions inventory for the SoCAB is compiled by South Coast AQMD and SCAG. Regional population, housing, and employment projections developed by SCAG are based, in part, on the County's General Plan land use designations. These projections form the foundation for the emissions inventory of the AQMP. The demographic trends are incorporated into SCAG's RTP/SCS to determine priority transportation projects and vehicle miles traveled in the SCAG region. Because the AQMP strategy is based on projections from local general plans, projects that are consistent with the local general plan are considered consistent with the air-quality-related regional plan. Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP, the latest of which was adopted in December 2022 and was built upon measures already in place from previous AQMPs, including the 2016 AQMP.

The population growth associated with future development by the WSAP would not conflict with the growth projections in the 2024–2050 RTP/SCS (see Section 5.14, *Population and Housing*). The Project accommodates growth in residential development within the WSAP identified in the County's Housing Element. As such, the WSAP also fall within the growth projections in the Draft 2022 AQMP.[14] Impacts would be less than significant.

## Consistency with Clean Air Goals

### *Construction*

The WSAP describes the long-term growth associated with buildout of the Westside Planning Area. Emissions of criteria pollutants associated with future development facilitated by adoption of the WSAP could exceed South Coast AQMD thresholds for criteria pollutants. However, under the WSAP, future development would be required to comply with CARB's requirements to minimize short-term emissions from on-road and offroad diesel equipment, including its airborne toxic control measures to limit idling of heavy-duty diesel motor vehicles to no more than five minutes. In addition, the WSAP would also be required to comply with South

[14] Please refer to Section 5.8, *Greenhouse Gas Emissions*, and Section 5.11, *Land Use and Planning*, of this Draft PEIR for additional information regarding consistency with the 2020–2045 RTP/SCS.

Coast AQMD's regulations, such as Rule 403, Fugitive Dust, and Rule 1113, Architectural Coatings. Compliance with these measures and requirements would be consistent with the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, the construction of future development under the WSAP would be consistent with the AQMP. Impacts are considered less than significant.

### *Operation*

Operation of future development under the WSAP would also be required to comply with the 2022 AQMP, which would include compliance with CARB motor vehicle standards, South Coast AQMD regulations for stationary sources and architectural coatings, Title 24 Energy Efficiency Standards, and the growth projections in the latest RTP/SCS. As discussed above, the AQMP includes Connect SoCal's land use and transportation strategies. The location, design, and land uses of the growth anticipated by the WSAP would implement these land use and transportation strategies to reduce vehicle trips for residents and employees of the County by increasing future mixed-use, commercial, and residential developments around major transit areas. The applicable land use strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, promoting a green region, and implementing GHG reduction strategies. The applicable transportation strategies include managing congestion through a Congestion Management Process and implementation of a Transportation Demand Management Program and Transportation System Management Plan. The majority of the transportation strategies are to be implemented by local governments, such as cities and counties, as well as other regional agencies such as SCAG and South Coast AQMD, although some strategies may be furthered by individual development projects. Several transit agencies provide local and regional transit service within the WSAP.

As a component of the General Plan, the WSAP focuses on ensuring smart growth, ensuring community services and infrastructure are sufficient to accommodate growth, provide the foundation for a strong and diverse economy, promote excellence in environmental resource management, and provide healthy, livable, and equitable communities. Overarching goals of the WSAP will aim to revitalize commercial corridors and centers while maintaining the character of existing residential neighborhoods; provide opportunities for the development of affordable housing; concentrate and support mixed-use development in an urban form that reduces vehicle travel and promotes access by walking, bicycling, and transit; improve access to parks and trail connectivity; identify culturally significant landmarks and amplify community identity; and improve pedestrian and traffic safety. New land use designations would increase density and, through emphasis on residential, commercial, and mixed uses instead of business/commercial uses, would facilitate development to achieve this vision and respond to the need to accommodate the plan area's growing and diverse population. Higher density residential and mixed use would replace lower density residential and commercial. The proposed zoning modifications would permit mixed-use development and higher densities within major commercial corridors and centers and along high quality transit corridors. The purpose of these changes would be to enable development of a greater diversity of housing types; economic vitalization of commercial corridors and centers; walkable connected communities with access to transit, parks, trails, and community gathering spaces; and a distinct community identity improving the quality-of-life for Westside communities. Higher densities, especially in residential and mixed-use designations, increase capacity for residential development near

community-serving commercial corridors and proximity to transit, which would make it easier for residents to travel throughout the communities. Therefore, the WSAP would not conflict with AQMP land use and transportation strategies to reduce VMT and regional mobile source emissions and would result in a less than significant impact associated with air quality. The WSAP would be consistent with the AQMP under the first indicator. Impacts are considered less than significant.

### Summary

The County continues to coordinate with South Coast AQMD and SCAG to ensure countywide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. In addition, the WSAP policies, listed in Section 5.3.3.2, *Proposed Project Characteristics and Relevant WSAP Goals and Policies*, would have the potential to reduce emissions, which would aid in addressing potential impacts related to conflicts with an applicable air quality plan. Therefore, the operation of future development under the WSAP would not conflict with or obstruct the implementation of the applicable air quality plan. Impacts are considered less than significant.

**Impact 5.3-2: Would construction of the Project result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard? [Thresholds AQ-2]**

**Significant and Unavoidable Impact.**

### Regional Construction

Construction of future development facilitated by adoption of the WSAP would have the potential to temporarily emit criteria air pollutant emissions through the use of heavy-duty construction equipment, such as excavators, cranes, and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from project sites, or coating operations such as painting or striping. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. However, the WSAP is a planning-level policy document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified under the WSAP. Therefore, quantification of emissions associated with buildout cannot be specifically determined at this time.

Any future construction facilitated by the WSAP would be required to comply with all South Coast AQMD rules, particularly Rule 403, Fugitive Dust, to control dust emissions during any dust-generating activities by implementing various best available fugitive dust control measures for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil by watering the site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and watering material prior to truck loading and ensuring that freeboard exceeds six inches. Each future development facilitated by adoption of the WSAP would also be required to comply with South Coast AQMD Rule 1113 for the control of VOC emissions from architectural coatings. Furthermore, future development facilitated by adoption of the WSAP would comply with the CARB Air Toxics Control Measure, which limits diesel-powered equipment and vehicle idling to no more than five

minutes at a location. Construction of future development would also comply with other CARB regulations, such as the In-Use Off-Road Diesel Vehicle Regulation, Truck and Bus Regulation, and Advanced Clean Fleets, which all require use of construction equipment and vehicle fleets that generate fewer criteria pollutant emissions, including zero- and near-zero-emissions on-road truck technologies as they become commercially available.

Compliance with these CARB and South Coast AQMD rules and regulations would reduce criteria pollutant emission during future construction, especially for VOC, $NO_X$, $PM_{10}$, and $PM_{2.5}$. However, even with mandatory compliance with these rules and regulations, future development projects under the WSAP may be large enough in scale or intensity and may require operation of heavy-duty construction equipment and heavy-duty trucks that could generate emissions in excess of the South Coast AQMD significance thresholds. Therefore, project-related construction activities facilitated by the adoption of the WSAP could result in a significant regional air quality impact.

## Regional Operation

Operation of future development under the WSAP would generate criteria pollutant emissions from transportation (i.e., vehicle trips), area sources (e.g., landscaping equipment, architectural coating), and energy (i.e., natural gas used for heating and cooking). Emissions from implementation of the WSAP would primarily be due to the increase in VMT as well as area source emissions from the new residential housing and commercial space within the Planning Area. As shown in Table 5.3-8, *Maximum Net Increase in Daily Regional Operation Emissions*, the net increase in operational emissions would exceed the South Coast AQMD significance thresholds. However, it must be noted that South Coast AQMD significance thresholds were specifically developed for use in determining significance for individual projects and not for program-level documents such as the WSAP. In addition, market demand would determine future development of the residential and nonresidential uses. Because modeling represents the worst-case conditions facilitated by adoption of the WSAP, the buildout duration through 2045 may generate fewer criteria air pollutants than estimated.

**Table 5.3-8 Maximum Net Increase in Daily Regional Operation Emissions**

| Source | Maximum Daily Emissions (lbs./Day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_x$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| On-Road Mobile | 14 | 86 | 468 | 2 | 42 | 17 |
| Area | 197 | 116 | 444 | 1 | 9 | 9 |
| Energy | 1 | 17 | 7 | <1 | 1 | 1 |
| **Total** | **212** | **220** | **920** | **3** | **53** | **28** |
| South Coast AQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Exceeds Threshold?** | **Yes** | **Yes** | **Yes** | No | No | No |

Source: CalEEMod Version 2022.1. Highest winter or summer emissions are reported. (see Appendix D-a).
Notes: lbs = Pounds; () = negative value

Overlapping emissions from the construction and operation of new phased development could occur under the WSAP. It is possible that some future development projects could be large enough in scale or intensity such that overlapping emissions from the construction and operation of new phased development could exceed the

South Coast AQMD significance thresholds and result in a significant regional air quality impact. The WSAP policies, listed above in Proposed Project Characteristics and Relevant WSAP Goals and Policies, would have the potential to reduce emissions, which could potentially address impacts. Therefore, future development facilitated by adoption of the WSAP that exceeds the thresholds would result in a potentially significant impact.

### Health Impacts from Construction and Operational Emissions

The California Supreme Court decision in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch") resulted in the need for CEQA documents to address human health impacts of regional criteria pollutant emissions that exceed air district standards. South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issues outlined in the Friant Ranch case. However, because regional emissions may exceed the South Coast AQMD regulatory thresholds during construction and operational activities, they may also exceed the California AAQS and National AAQS and would result in a health impact. The health impacts from criteria pollutants may be found in Table 5.3-1.

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 5.3-5 are not correlated with concentrations of air pollutants but contribute to the cumulative air quality impacts in the SoCAB. These thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-based federal AAQS. 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 previously. Projects that do not exceed the South Coast AQMD regional significance thresholds in Table 5.3-5 would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels in Table 5.3-5, those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to elevating health effects associated with these criteria air pollutants. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 5.3-5, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment, because mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch"). South Coast AQMD currently does not have methodologies that would provide the County with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result

from a proposed project's mass emissions.[15] Ozone concentrations are dependent on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, and the absence of modeling tools that could provide statistically valid data and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects, it is not possible to link specific health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

**Impact 5.3-3: Would construction of the Project expose sensitive receptors to substantial pollutant concentrations? [Threshold AQ-3]**

## Construction

**Significant and Unavoidable Impact.** This impact analysis describes changes in localized impacts from short-term construction. The Project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevated levels. Localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects.

### *Construction-Phase Localized Significance Thresholds*

Construction of future development under the WSAP has the potential to create localized air quality impacts through the use of heavy-duty construction equipment and fugitive dust emissions generated by construction activities. In addition, the application of architectural coatings (i.e., paints) and other building materials would release VOCs, which may also contribute to creating localized air quality impacts. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

However, since information on future development under the WSAP is unknown, emissions modeling is not feasible and would be speculative at best. Because future development could occur near existing sensitive receptors, development under the WSAP has the potential to expose sensitive receptors to substantial pollutant concentrations. Emissions from construction equipment exhaust and fugitive particulate matter emissions

[15] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch") in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in Friant Ranch by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects within the South Coast AQMD region.

would have the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions and result in a potentially significant impact.

### *Construction-Phase Toxic Air Contaminants*

Construction of future development under the WSAP would require use of heavy, off-road construction equipment which would generate Toxic Air Contaminants (TACs). The exact nature, location, and operation of the future developments are unknown, and health risk impacts from TACs are cumulative over the life of the nearby receptors. Therefore, quantification of potential health risks would be speculative. However, as construction activities may occur within close proximity to sensitive receptors, health risk from these developments may exceed regulatory levels. Therefore, health risk with respect to future development under the WSAP would be potentially significant.

## Operation

This impact analysis describes changes in localized impacts from long-term operation. The Project could expose sensitive receptors to elevated pollutant concentrations during operation-phase activities if it would cause or contribute significantly to elevated pollutant levels. Unlike the mass of emissions shown in the regional emissions analysis in Table 5.3-8, which is described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects. In accordance with South Coast AQMD methodology, because the Project does not involve industrial or warehouse land uses, long-term operation of the project would not generate a substantial increase in TACs. Long-term localized criteria air pollutants impacts associated with the Project are described below:

### *Operational Localized Significance Thresholds*

South Coast AQMD recommends that localized air quality impacts on sensitive receptors in the immediate vicinity of a project be evaluated. The screening-level localized significance thresholds (LSTs) are the amount of project-related stationary and area sources of emissions at which localized concentrations (ppm or $\mu g/m^3$) would exceed the ambient air quality standards of the criteria air pollutants for which the SoCAB is designated nonattainment. Land uses that have the potential to generate substantial sources of emissions or would require a permit from South Coast AQMD include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur on-site.

Based on the scope and nature of the WSAP, it would primarily develop residential and commercial uses and would not fall within these categories of uses. While operation of these uses under the WSAP could result in the use of standard on-site mechanical equipment such as heating, ventilation, and air conditioning units in addition to occasional use of landscaping equipment for project area maintenance, air pollutant emissions generated would be small. Additionally, commercial land uses could require installation of emergency generators. However, permitted equipment is regulated by South Coast AQMD, which includes restrictions of total annual hours of use and emissions. In addition, the WSAP policies listed in Section 5.3.3.2, *Proposed Project Characteristics and Relevant WSAP Goals and Policies*, would potentially reduce emissions further. Thus, localized air quality impacts from project-related operations under the WSAP would be less than significant.

### *Carbon Monoxide 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. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse in the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. The SoCAB has been designated in attainment of both the National and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact (BAAQMD 2023).

The potential for the WSAP to cause or contribute to CO hotspots is evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by South Coast AQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the WSAP would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at project intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required. CO levels in the Westside Planning Area are below the National and California AAQS because the county portion of the SoCAB is designated as attainment. Maximum CO levels within the Westside Planning Area in the last three years are 1.5 to 2.0 ppm (1-hour average) and 1.0 to 1.2 ppm (8-hour average) (South Coast AQMD 2024b). CO levels decreased dramatically in California with the introduction of the catalytic converter in 1975. Furthermore, CO emissions from vehicles have substantially declined compared to 2003-era vehicles based on improved vehicle emissions standards and are presumed not to exceed the applicable thresholds. No exceedances of CO have been recorded at monitoring stations in the SoCAB since 2003 (South Coast AQMD 2022). Thus, it is not expected that CO levels at roadway intersections would rise to the level of an exceedance of these standards.

Additionally, South Coast AQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the air basin: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, South Coast AQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the screening values would be up to 7.0 ppm (1-hour average) and 5.2 ppm (8- hour average). Based on the intersection volumes identified at these modeled intersections, if a project's traffic levels exceed 100,000 vehicles per day at any project impacted intersection, there would be the potential for a significant impact, and dispersion modeling would need to be conducted to determine the project level impact.

Based on roadway segment volumes provided by Fehr and Peers under the WSAP buildout horizon, the roadway segment with the maximum potential peak traffic in the plan area near the areas of change are Slauson Avenue and La Cienega, which have PM peak hour segment volumes of 1,749 vehicles and 587 vehicles, respectively. That is, the highest peak hour intersection volume in the plan area near the areas of change is 2,336 vehicles in the PM peak hour. Therefore, peak roadway intersection volumes would be below the 100,000 vehicles per day modeled in South Coast AQMD's 2003 AQMP CO attainment demonstration. This comparison demonstrates that the WSAP would not contribute considerably to the formation of CO hotspots, and no further CO analysis is required. The WSAP would result in a less-than-significant impact with respect to CO hotspots.

**Impact 5.3-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? [Threshold AQ-4]**

**Less than Significant Impact.**

The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD 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.

## Construction-Related Odors

Potential sources that may emit odors during construction activities include architectural coatings and solvents. South Coast AQMD Rule 1113, Architectural Coatings, limits the amount of VOCs from architectural coatings and solvents. According to the South Coast AQMD *CEQA Air Quality Handbook*, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Airborne Toxic Contral Measures, adopted in 2004, that limits diesel-fueled commercial vehicle idling to five minutes at any given location. Future development facilitated by adoption of the WSAP would also comply with South Coast AQMD Rule 402, Nuisance, which prohibits the emission of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with South Coast AQMD Rules and State measures, construction activities and materials would not create objectionable odors. Noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reached any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Therefore, impacts associated with construction-generated odors from future development within the WSAP are considered less than significant.

### Operational-Phase Related Odors

The type of facilities that are considered to have objectionable odors include wastewater treatment 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. The WSAP land uses are related to growth in residential and commercial land uses and are not expected to introduce substantial sources of other emissions, including odors. Odors generated by new multi-family residential development and commercial land uses would be similar to odors generated by the existing land uses. Additionally, the Project would be required to comply with South Coast AQMD Rule 402. Therefore, the WSAP would not generate potentially significant odor impacts affecting a substantial number of people, and impacts would be less than significant.

## 5.3.4 Cumulative Impacts

In accordance with the South Coast AQMD 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 in the project area. The greatest source of emissions in the SoCAB is mobile sources. Due to the extent of the area potentially impacted by cumulative project emissions (i.e., the SoCAB), the South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the South Coast AQMD regional emissions thresholds shown in Table 5.3-5. In addition, per the draft guidelines released by the South Coast AQMD cumulative risk Working Group, projects that result in project risk impacts are also considered to result in cumulative risk impacts (South Coast AQMD 2023b).

### Construction

The SoCAB is designated nonattainment for $O_3$, $PM_{2.5}$, and lead (Los Angeles County only) under the California and National AAQS and nonattainment for $NO_2$ and $PM_{10}$ under the California AAQS.[16] Construction of cumulative projects would further degrade the regional and local air quality. Air quality would be temporarily impacted during construction activities. As discussed above in Impact 5.3-2 and Impact 5.3-3, future development facilitated by adoption of the WSAP may result in regional and localized emissions that could exceed the South Coast AQMD significance thresholds during construction. In addition, construction activities associated with the development of individual projects under the WSAP may exceed cancer risk significance thresholds Therefore, the cumulative impact would be significant and unavoidable.

### Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional and/or cancer risk threshold values is not considered a substantial source of air pollution by the South Coast AQMD and does not add significantly to a cumulative impact. As discussed above in Impact 5.3-2, future

[16] CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for $PM_{10}$ to attainment for $PM_{10}$ under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour $PM_{10}$ standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California's request to redesignate the South Coast $PM_{10}$ nonattainment area to attainment of the $PM_{10}$ National AAQS, effective on July 26, 2013.

development facilitated by adoption of the WSAP may result in operational emissions that could exceed the South Coast AQMD significance thresholds. Therefore, the cumulative impact would be significant and unavoidable.

## 5.3.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: Impacts 5.3-1 and Impact 5.3-4.

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.3-2** Construction of future developments under the WSAP may generate short-term emissions that exceed South Coast AQMD's significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB.

  Operation of future developments under the WSAP may generate long-term emissions that exceed South Coast AQMD's significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB.

- **Impact 5.3-3** Construction of future developments under the WSAP may expose sensitive receptors to substantial pollutant concentrations or DPM.

## 5.3.6 Mitigation Measures

### Impact 5.3-2

AQ-1 In accordance with South Coast Air Quality Management District (South Coast AQMD) Rule 403, the County shall require the following measures to be taken during the construction of all future development projects to reduce the amount of dust and other sources of particulate matter:

- Water exposed soils at least three times daily and maintain equipment and vehicle engines in good condition and in proper tune.
- Wash off trucks leaving development sites and water down all construction areas.
- Replace ground cover on construction sites if it is determined that the site will be undisturbed for lengthy periods.
- Reduce speeds on unpaved roads to less than 15 miles per hour.
- Halt all grading and excavation operations when wind speeds exceed 25 miles per hour.
- Properly maintain diesel-powered on-site mobile equipment.
- Install particulate filters on off-road construction equipment.

- Sweep streets at the end of the day if substantial visible soil material is carried over to the adjacent streets.
- Cover all trucks hauling dirt, sand, soil or other loose material to and from the site.
- Limit truck construction traffic to non-peak times of the morning or afternoon.
- Use surfactants and other chemical stabilizers to suppress dust at construction sites.
- Use wheel washers for construction equipment.

AQ-2 The County shall require that applicants for new development projects incorporate the following to reduce air pollutant emissions during construction activities:

- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 4 Final (model year 2008 or newer) or stricter emission limits for engines between 50 and 750 horsepower. If Tier 4 Final equipment is not available, the applicant shall provide documentation or demonstrate its unavailability to the County of Los Angeles prior to the issuance of any construction permits.
- During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the County. The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site.
- Use paints with a VOC content that meets the South Coast AQMD Super Compliant architectural coatings standard of 10 grams per liter (g/L) or less for coating building architectural surfaces.
- Use paints with a VOC content of 50 g/L or less for parking areas and surfaces.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the County and shall be verified by the County's Planning Department.

Policies identified in the WSAP would minimize long-term air quality impacts. However, no additional feasible mitigation measures have been identified that would reduce long-term emissions associated with future residential and commercial land use to less than significant levels.

### Impact 5.3-3

Implementation of Mitigation Measures AQ-1 and AQ-2.

## 5.3.7 Level of Significance After Mitigation

### Impact 5.3-2

#### *Construction*

Construction activities associated with buildout of the WSAP could generate short-term emissions that exceed the South Coast AQMD's regional significance thresholds. Mitigation Measures AQ-1 and AQ-2 would reduce fugitive dust and exhaust emissions during construction activities to the extent feasible. However, even with implementation of these measures, future development projects under the WSAP may be large enough in scale or intensity that emissions could continue to exceed the South Coast AQMD significance thresholds. Therefore, Impact 5.3-2 for construction is **significant and unavoidable**.

#### *Operation*

Development associated with buildout of the WSAP would generate long-term emissions that exceed the South Coast AQMD's regional significance thresholds. Policies identified in the WSAP would minimize long-term air quality impacts. However, no additional feasible mitigation measures have been identified that would reduce long-term operational emissions associated with future residential and commercial land use to less than significant levels. Therefore, Impact 5.3-2 for operation is **significant and unavoidable**.

### Impact 5.3-3

Construction of future developments under the WSAP may expose sensitive receptors to substantial pollutant concentrations or DPM. Mitigation Measures AQ-1 and AQ-2 would reduce fugitive dust and exhaust emissions (including DPM) during construction activities to the extent feasible. However, the exact nature, location, and operation of the future developments are unknown, and health risk impacts from TACs are cumulative over the life of the nearby receptors. Therefore, quantification of potential health risks would be speculative, and as such, this impact is conservatively considered to be significant. Therefore, Impact 5.3-3 is **significant and unavoidable**.

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# 5. Environmental Analysis
## AIR QUALITY

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# 5.4 BIOLOGICAL RESOURCES

This section identifies and evaluates issues related to biological resources to determine whether the Westside Area Plan (proposed Project or WSAP) would result in a significant impact relating to candidate or special status species, sensitive natural communities, protected wetlands, wildlife corridors, or unique native woodlands. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment. The information in this section is based in part on information contained in the:

- *Westside Area Plan Biological Resources*, ECORP, April 2024 (see Appendix C to this Draft PEIR)

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.4.1 Environmental Setting

### 5.4.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *Endangered Species Act*

The Federal Endangered Species Act (FESA) of 1973, as amended, protects and conserves any species of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found. "Take" of endangered species is prohibited under Section 9 of the FESA. "Take" means to "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Section 7 of the FESA requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) on proposed federal actions that may affect any endangered, threatened, or proposed (for listing) species or critical habitat that may support the species. Section 4(a) of the FESA requires that critical habitat be designated by the USFWS "to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened." This provides guidance for planners/managers and biologists by indicating locations of suitable habitat and where preservation of a particular species has high priority. Section 10 of the FESA provides the regulatory mechanism for incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCP) for the impacted species must be developed in support of incidental take permits to minimize impacts to the species and formulate viable mitigation measures.

##### *Federal Rivers and Harbors Act*

The federal Rivers and Harbors Act requires permits in navigable "waters of the U.S." for all structures, such as riprap, and activities, such as dredging. Navigable waters are defined as those that are subject to the ebb and flow of the tide and are susceptible for use in their natural condition or by reasonable improvements as means

to transport interstate or foreign commerce. The United States Army Corps of Engineers (USACE) grants or denies permits based on the effects on navigation.

This regulatory law is becoming more prominent on projects involving impacts to isolated Waters of the state (non-404/401 waters). The Regional Water Quality Control Board (RWQCB) is increasingly requiring waste discharge requirement permits for impacts to Waters of the state, where there are no associated Waters of the U.S.

### *Migratory Bird Treaty Act*

The Migratory Bird Treaty Act of 1918 (MBTA) affirms and implements the United States' commitment to four international conventions—with Canada, Japan, Mexico, and Russia—to protect shared migratory bird resources. The MBTA governs the take, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. It prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these items, except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the MBTA.

### *Clean Water Act, Section 404*

The USACE regulates discharge of dredged or fill material into waters of the U.S.[1] Any filling or dredging in waters of the U.S. requires a permit, which entails assessment of potential adverse impacts to USACE wetlands and jurisdictional waters and any mitigation measures that the USACE requires. Section 7 consultation with USFWS may be required for impacts to a federally listed species. If cultural resources may be present, Section 106 review may also be required. When a Section 404 permit is required, a Section 401 Water Quality Certification is also required from the RWQCB.

### *Clean Water Act, Section 401and 402*

Section 401(a)(1) of the CWA specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include USACE Section 404 permits and National Pollutant Discharge Elimination System (NPDES) permits issued by the Environmental Protection Agency (EPA) under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB. The Planning Area is in the jurisdiction of the Santa Ana RWQCB (Region 4).

[1] "Waters of the United States," as applied to the jurisdictional limits of the USACE under the Clean Water Act, includes all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the tide; all interstate waters, including interstate wetlands; and all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds whose use, degradation, or destruction could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; and wetlands adjacent to waters. The terminology used by Section 404 of the Clean Water Act includes "navigable waters," which is defined at Section 502(7) of the act as "waters of the United States, including the territorial seas."

### *Executive Order 11990: Protection of Wetlands*

President Carter signed Executive Order (EO) 11990 on May 24, 1977, requiring federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. The term "wetlands" is defined as those areas that are inundated by surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Examples of wetlands are also provided in the EO: wetlands generally include swamps, marshes, bogs, and similar areas, such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. An Individual EO 11990 "Wetlands Only Practicable Alternative Finding" is required from the Federal Highway Administration if a state project is federally aided and involves fill in wetlands requiring an USACE Section 404 Individual or Nationwide Permit. An additional requirement is to provide early public involvement in projects affecting wetlands.

### *Executive Order 13112: Invasive Species Protection*

President Clinton signed EO 13112 on February 3, 1999, requiring federal agencies to combat the introduction or spread of invasive species in the United States. The order defines invasive species as "…any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health." Federal Highway Administration guidance issued August 10, 1999, directs the use of the state's noxious weed list to define the invasive plants, which must be considered as part of California Environmental Quality Act (CEQA) analysis for a proposed project.

## State Laws, Regulations, and Policies

### *Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Control Act requires "any person discharging waste, or proposing to discharge waste, within any region that could affect the Waters of the State to file a report of discharge" with the RWQCB through State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures) (California Code of Regulations [CCR], Title 23, Section 3855) (SWRCB 2021). Waters of the State are defined as any surface water or groundwater, including saline waters, within the boundaries of the State (California Water Code Section 13050[e]). Pollution is defined as an alteration of the quality of the waters of the State by waste to a degree that unreasonably affects its beneficial uses (California Water Code Section 13050) and includes filling in waters of the State. Note that CCR Section 3855 applies only to individual water quality certifications, but the new Procedures extend the application of Section 3855 to individual waste discharge requirements for discharges of dredged or fill material to waters of the State and waivers thereof.

A permit for impacts to waters of the State would likely be required under the CWA and/or Porter-Cologne Water Quality Control Act. To determine whether a project should be regulated pursuant to the Porter-Cologne

Water Quality Control Act, the RWQCB considers whether project activities could impact the quality of waters of the State.

### *California Endangered Species Act*

The California Department of Fish and Wildlife (CDFW) administers the California Endangered Species Act (CESA), prohibits the take of plant and animal species that the California Fish and Game Commission identifies as either threatened or endangered in the state (California Fish and Game Code Section 2050–2097). "Take" means to hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture, or kill. CESA Sections 2091 and 2081 allow CDFW to authorize exceptions to the prohibition of take of the state-listed threatened or endangered plant and animal species for purposes, such as public and private development. CDFW requires formal consultation to ensure that these actions would not jeopardize the continued existence of any listed species or destroy or adversely modify Critical Habitat.

### *California Fish and Game Code Sections 3503, 3511, 3513, 3801, 4700, 5050, and 5515*

Sections 2081(b) and (c) of the California Fish and Game Code authorize take of endangered, threatened, or candidate species if take is incidental to otherwise lawful activity and if specific criteria are met. These provisions also require CDFW to coordinate consultations with USFWS for actions involving federally listed species that are also state-listed species. In certain circumstances, Section 2080.1 of CESA allows CDFW to adopt a federal incidental take statement or a 10(a) permit as its own, based on its findings that the federal permit adequately protects the species and is consistent with state law. A Section 2081(b) permit may not authorize the take of "fully protected" species or "specified birds" (California Fish and Game Code Sections 3505, 3511, 4700, 5050, 5515, and 5517). If a project is planned in an area where a fully protected species or a specified bird occurs, an applicant must design the project to avoid take.

### *California Fish and Game Code, Section 1600*

Pursuant to Section 1602 of the California Fish and Game Code, a Streambed Alteration Agreement application must be submitted for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake" (CDFW 2023a). In 14 CCR Section 1.72, the CDFW defines a stream (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation." In Chapter 9, Section 2785 of the Fish and Game Code, "riparian habitat" is defined as "lands which contain habitat which grows close to, and which depends upon soil moisture from a nearby freshwater source."

The CDFW's jurisdiction includes drainages with a definable bed, bank, or channel and areas associated with a drainage channel that support intermittent, perennial, or subsurface flows; supports fish or other aquatic life; or supports riparian or hydrophytic vegetation. It also includes areas that have a hydrologic source.

The CDFW will determine if the proposed actions will result in diversion, obstruction, or change of the natural flow, bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. If warranted, the CDFW will issue a Streambed Alteration Agreement that includes measures to protect affected fish and wildlife

resources; this Streambed Alteration Agreement is the final proposal agreed upon by the CDFW and the applicant.

### *California Environmental Quality Act*

CEQA establishes several other criteria by which public agencies determine whether a proposed activity may affect the quality of the environment. For biological resources, CEQA identifies potentially significant impacts as those that would have a substantial adverse impact on special-status species, riparian habitats or other sensitive natural communities, wetlands, or fish or wildlife migration corridors or nursery sites. CEQA also identifies potentially significant impacts to include those that would conflict with a local policy or ordinance protecting biological resources (such as a tree preservation policy) or an adopted habitat conservation plan or natural community conservation plan.

## Local Laws, Regulations, and Policies

### *Los Angeles County Code*

The Los Angeles County Code consists of the regulatory, penal, and administrative ordinances for the County. Components of the County Code that are applicable to the subject of biological resources are identified below.

#### *Title 22: Planning and Zoning*

**Chapter 22.104,** Hillside Management Areas, was established to ensure that development preserves and enhances the physical integrity, biological resources, and scenic value of Hillside Management Areas (HMA), to provide open space, and to be compatible with and enhance community character. These goals are to be accomplished by: (1) locating development outside of HMAs to the extent feasible; (2) locating development in the portions of HMAs with the fewest hillside constraints; and (3) using sensitive hillside design techniques tailored to the unique site characteristics. In locating building pads, public safety, and biological resource protection shall have priority over scenic resource preservation. The HMA Ordinance and Hillside Design Guidelines (Title 22, Appendix I, Hillside Design Guidelines) implement the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. HMAs are defined as areas with 25 percent or greater natural slopes. The Hillside Design Guidelines are required for development in HMAs unless exempted under the provisions of the ordinance. A Sensitive Hillside Design Measures Checklist is used by applicants to determine whether the Hillside Design Guidelines would be applicable. Appendix I, Hillside Design Guidelines, of the HMA Ordinance and Hillside Design Guidelines encourages retention and incorporation of 50 percent or more of existing onsite trees and woodlands (particularly native and drought-tolerant species, and oak woodlands) into a project's landscaping plan.

**Chapter 22.126,** Tree Planting Requirements, establishes a project's tree planting requirements to provide environmental benefits. Trees planted pursuant to this chapter will reduce greenhouse gases by absorbing carbon dioxide, reduce water pollution by retaining storm water onsite, and reduce the urban heat island effect by shading impervious surfaces. This chapter applies to any project that includes a "new principal use building," additions to buildings where at least 50 percent of the new floor area is added, and new surface parking lots. The chapter sets minimum tree planting requirements for number of trees, species, size, and location.

**Chapter 22.174,** Oak Tree Permits, was established: (a) to recognize oak trees as significant historical, aesthetic, and ecological resources, and as one of the most picturesque trees in Los Angeles County, lending beauty and charm to the natural and manmade landscape, enhancing the value of property, and the character of the communities in which they exist; and (b) to create favorable conditions for the preservation and propagation of this unique, threatened plant heritage, particularly those trees which may be classified as heritage oak trees, for the benefit of current and future residents of the County. It is the intent of the Oak Tree Permit to maintain and enhance the general health, safety and welfare by assisting in counteracting air pollution and in minimizing soil erosion and other related environmental damage. The County requires permits prior to removing or damaging oaks unless subject to exemptions (e.g., emergency, utility maintenance, tree maintenance, and for trees planted in road rights-of-way to maintain line-of-site or to relocate trees causing damage to roadway improvements). Otherwise, in unincorporated areas, native oak trees that are at least eight inches in diameter (or, for trees with multiple trunks with a combined diameter measuring at least 12 inches) at 4.5 feet above grade shall not be cut, destroyed, removed, relocated, or damaged unless an oak tree permit is first obtained. The ordinance also extends to include encroachment with the protected zone of such trees. The "protected zone" is that area within the dripline of an oak tree and extending to a point at least 5 feet outside the dripline, or 15 feet from the trunks of a tree, whichever distance is greater.

**Chapter 22.102,** Significant Ecological Areas (SEA). SEAs are officially designated areas within Los Angeles County with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity in Los Angeles County by designating biological resource areas that are capable of sustaining themselves into the future. The SEA also protects native trees and provides a list of the protected species and the size of the diameter of the trunk that triggers protection. The SEA Ordinance establishes the permitting, design standards and review process for development in SEAs, balancing preservation of the County's natural biodiversity with private property rights. A discretionary SEA Conditional Use Permit application is required for development that cannot demonstrate compliance with Section 22.102.070 (Protected Tree Permit), or Sections 22.102.090 (SEA Development Standards) and 22.102.100 (Natural Open Space Preservation).

### *Los Angeles County Oak Woodland Conservation Management Plan / CEQA Policy*

The purpose of the Los Angeles County Oak Woodland Conservation Management Plan is to meet the requirements of the California Oak Woodlands Conservation Act (Assembly Bill [AB] 242 of 2001). The Act established requirements for the preservation and protection of oak woodlands and trees, and allocated funding managed by the Wildlife Conservation Board. To be eligible for project funding under this bill, counties must create an Oak Woodland Management Plan. This plan contains two parts—Part I presents a voluntary oak woodlands conservation strategy for Los Angeles County, and Part II provides recommendations for planning and implementation elements of the plan for incorporation into relevant county regulations and planning documents. The implementation strategy in Part II promotes three components: preservation, where oak woodland remains intact and functional; conservation, where woodlands are integrated into land development; and, mitigation, where loss of oak woodlands in one area is mitigated off-site through restoration, creation, or purchase for preservation in another area.

### *Los Angeles County General Plan*

The General Plan includes guiding principles, which inform the County's goals, policies, and implementation actions. The following goals and policies are relevant to the proposed Project and applicable to biological resources (LA County 2015).

**Goal C/NR 1:** Open space areas that meet the diverse needs of Los Angeles County.

- **Policy C/NR 1.3.** Support the acquisition of new available open space areas. Augment this strategy by leveraging County resources in concert with the compatible open space stewardship actions of other agencies, as feasible and appropriate.

**Goal C/NR 2:** Effective collaboration in open space resource preservation.

- **Policy C/NR 2.2.** Encourage the development of multi-benefit dedicated open spaces.

- **Policy C/NR 3.8.** Discourage development in areas with identified significant biological resources, such as SEAs.

**Goal C/NR 3:** Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs.

- **Policy C/NR 3.1.** Conserve and enhance the ecological function of diverse natural habitats and biological resources.

- **Policy C/NR 3.2.** Create and administer innovative County programs incentivizing the permanent dedication of SEAs and other important biological resources as open space areas.

- **Policy C/NR 3.3.** Restore upland communities and significant riparian resources, such as degraded streams, rivers, and wetlands to maintain ecological function—acknowledging the importance of incrementally restoring ecosystem values when complete restoration is not feasible.

- **Policy C/NR 3.6.** Assist state and federal agencies and other agencies, as appropriate, with the preservation of special status species and their associated habitat and wildlife movement corridors through the administration of the SEAs and other programs.

- **Policy C/NR 3.8.** Discourage development in areas with identified significant biological resources, such as SEAs.

- **Policy C/NR 3.10.** Require environmentally superior mitigation for unavoidable impacts on biologically sensitive areas, and permanently preserve mitigation sites.

- **Policy C/NR 3.11.** Discourage development in riparian habitats, streambeds, wetlands, and other native woodlands in order to maintain and support their preservation in a natural state, unaltered by grading, fill, or diversion activities.

#### 5.4.1.2 EXISTING CONDITIONS

Information in this section is derived from data in the WSAP Biological Resources Background Report (Appendix C). The Study Area for Appendix C consisted of the 4.8 square miles of the Ladera Heights, View Park, and Windsor Hills communities and 0.07 square mile of the West Fox Hills community of the Westside Planning Area (Planning Area). The Study Area is within a highly urbanized area with a mix of residential, commercial, and industrial land uses of the Planning Area. The majority of the Study Area is in a highly developed urbanized part of Los Angeles County. However, there are undeveloped portions of the Planning Area consisting of annual grassland, coast live oak woodland, coastal sage scrub, and mixed chaparral vegetation. The Ballona Wetlands—an important coastal ecological area south of Marina del Rey area and one of three remaining remnants of salt marsh in the county—are home to many sensitive plant and wildlife species. The Ballona Wetlands, Santa Monica Mountains, and El Segundo Dunes are designated as SEA by the Los Angeles County General Plan.

### Hydrology and Climate

The Study Area is in the Ballona Creek Subwatershed (12-digit Hydrologic Unit Code 180701040300). Ballona Creek, a nine-mile flood protection channel, receives flows from the Santa Monica Mountains to the north, Interstate 10 (I-110, Harbor Freeway) to the east, and Baldwin Hills to the south. Ballona Creek and its major tributaries, including Centinela Creek, Sepulveda Canyon Channel, and Benedict Canyon Channel, drain approximately 130 square miles of the Los Angeles Basin. The Ballona Creek Watershed ultimately drains into the Pacific Ocean through the Ballona Wetlands at the mouth of Ballona Creek.

Prevailing temperatures are mild, averaging between 55 to 71 degrees Fahrenheit (°F) annually. Precipitation averages 13.93 inches per year with the rainy season occurring in winter.

### Soils

Soil types were determined using the Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2023). A total of 10 soil types were identified in the Study Area, as listed in Table 5.4-1, *NRCS Soil Types in the Project Area*. None of the mapped soils are listed as hydric soils.

**Table 5.4-1 NRCS Soil Types Mapped in the Study Area**

| Series Number | Series/Soil Name | Hydric (Yes/No) | Planning Area Location |
|---|---|---|---|
| 1005 | Urban land-Biscailuz-Hueneme, drained complex, 0 to 2 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1010 | Cropley-Urban land complex, 0 to 5 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1118 | Longshore-Pachic haploxerolls complex, 20 to 55 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1119 | Urban land-Sepulveda-Longshore, graded complex, 3 to 12 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1124 | Urban land-Wind fetch-Centinela complex, 0 to 5 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1125 | Urban land-Typic Xerorthents, terraced-Wind fetch complex, 2 to 9 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1128 | Urban land-Anthraltic Xerorthents, loamy substratum-Grommet complex, 0 to 5 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1134 | Urban land-Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 1218 | Urban land-Typic Xerorthents, terraced complex, 10 to 35 percent slopes | No | Ladera Heights, View Park, and Windsor Hills |
| 9997 | Mined land, oil wells | No | Ladera Heights, View Park, and Windsor Hills |
| 1104 | Urban land-Aquic Xerorthents, graded-Pacheco, warm complex, 0 to 2 percent slopes | No | West Fox Hills |
| 1231 | Urban land-Typic Xerorthents, dredged spoil complex, 0 to 2 percent slopes | No | West Fox Hills |
| 1211 | Urban land, frequently flooded, 0 to 5 percent slopes | No | West Fox Hills |

# 5. Environmental Analysis
## BIOLOGICAL RESOURCES

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## Special-Status Plants

Special-status plant species include those classified as endangered or threatened, proposed or candidate species for listing by the USFWS or CDFW, and monitored by the California Native Plant Society (CNPS) and considered to be those of greatest conservation need.

Forty-four special-status plant species known to occur or have occurred in the vicinity of the Study Area were identified. In addition, one species, Gambel's watercress (*Nasturtium gambelii*), whose range includes the Study Area, was identified by the informal USFWS IPaC search (USFWS 2023a). The table, labeled Appendix B, for plants with potential to occur in the Study Area (in Appendix C) summarizes the special-status plant species, associated habitats, general location information for previously documented occurrences in the Study Area, and probability of occurrence within the Study Area. However, this table should not be considered a complete list of special-status plant species that may occur within the Study Area. Other species not identified in the literature review may occur in the Study Area presently or in the future. For each special-status plant species, a determination was made regarding potential for the species to occur within the Study Area based on information gathered during the literature review, such as habitat associations, preferred soil substrate, and elevation present. As discussed in Chapter 4, *Environmental Setting*, of this Draft PEIR, the proposed 12 Opportunity Sites and Inglewood Oil Field are largely disturbed and/or developed and are within primarily urbanized areas of the Study Area. Although plant species listed under FESA and/or CESA are not expected to occur within the 12 Opportunity Sites, these plants have the potential to occur within other parts of the Study Area, including the Inglewood Oil Field, and thus are described in more detail below. Information regarding the biological context of the Inglewood Oil Field is provided below under this section.

**Marsh sandwort** (*Arenaria paludicola*) is a state and federally listed endangered species and a California Rare Plant Rank (CRPR) 1B.1 listed species. Marsh sandwort is a perennial stoloniferous herb that flowers between May and August and is known to occur in sandy openings of marshes and swamps and areas that are wet year-round. This species has been found at elevations between 3 and 170 meters.

**Braunton's milk-vetch** (*Astragalus brauntonii*) is a federally listed endangered species and a CRPR 1B.1 listed species. Braunton's milk-vetch is a perennial herb that flowers between January and August and is known to occur in disturbed coastal sage scrub, closed-cone pine forest, chaparral, and valley grassland. It has been found at elevations between 4 and 640 meters.

**Ventura marsh milk-vetch** (*Astragalus pycnostachyus* var. *lanosissimus*) is a state and federally listed endangered species and a CRPR 1B.1 listed species. Ventura marsh milk-vetch is a perennial herb that flowers between August and October and is known to occur in coastal dunes, coastal scrub, marshes, and swamps. It has been found at elevations between 1 and 35 meters.

**Coastal dunes milk-vetch** (*Astragalus tener* var. *titi*) is a state and federally listed endangered species and is a CRPR 1B.1 listed species. Coastal dunes milk-vetch is an annual herb that flowers between March and May and is known to occur in sandy soils of coastal bluff scrub, coastal dunes, and coastal prairie. It has been found at elevations between 1 and 50 meters.

**Nevin's barberry** (*Berberis nevinii*) is a state and federally listed endangered species and a CRPR 1B.1 listed species. Nevin's barberry is a perennial evergreen shrub that flowers between March and June and is known to occur in chaparral, cismontane woodland, coastal scrub, and riparian scrub. It has been found at elevations between 70 and 825 meters.

**Salt marsh bird's-beak** (*Chloropyron maritimum* ssp. *Maritimum*) is a state and federally listed endangered species and a CRPR 1B.2 listed species. Salt marsh bird's-beak is a hemi parasitic annual herb that flowers between May and October and is known to occur in coastal dunes, and coastal salt marshes and swamps. It has been found at elevations between 0 and 30 meters.

**San Fernando Valley spineflower** (*Chorizanthe parryi* var. *fernandina*) is a state listed endangered species and a CRPR 1B.1 listed species. San Fernando Valley spineflower is an annual herb that flowers between April and July and is known to occur in sandy soils of coastal scrub and valley and foothill grassland. It has been found at elevations between 150 and 1220 meters.

**Santa Susana tarplant** (*Deinandra minthornii*) is a state listed rare species and a CRPR 1B.2 listed species. Santa Susana tarplant is a perennial deciduous shrub that flowers between July and November and is associated with chaparral and coastal scrub. This species has been found at elevations between 280 and 760 meters.

**Beach spectaclepod** (*Dithyrea maritima*) is a state listed threatened species and a CRPR 1B.1 listed species. Beach spectaclepod is a perennial rhizomatous herb that flowers between March and May and is known to occur in coastal dunes and sandy soils of coastal scrub habitat. This species has been found at elevations between 3 and 50 meters.

**Santa Monica dudleya** (*Dudleya cymosa* ssp. *Ovatifolia*) is a federally listed threatened species and a CRPR 1B.1 listed species. Santa Monica dudleya is a perennial herb that flowers between March and June and is known to be found in chaparral and coastal scrub. It has been found at elevations between 150 and 1675 meters.

**San Diego button-celery** (*Eryngium aristulatum* var. *parishii*) is a state and federally listed endangered species and a CRPR 1B.1 listed species. San Diego button-celery is an annual/perennial herb that flowers between April and June and is known to occur in coastal scrub, valley and foothill grassland, and vernal pools. It has been found at elevations between 20 and 620 meters.

**Gambel's watercress** (*Nasturtium gambelii*) is a federally listed endangered species, state listed threatened species, and a CRPR 1B.1 listed species. Gambel's watercress is a perennial rhizomatous herb that is associated with freshwater or brackish marshes and swamps. This species has been found at elevations between 5 and 330 meters.

**Spreading navarretia** (*Navarretia fossalis*) is a federally listed threatened species and a CRPR 1B.1 listed species. Spreading navarretia is an annual herb that flowers between April and June and is known to be found in chenopod scrub, shallow freshwater marshes and swamps, playas, and vernal pools. It has been found at elevations between 30 and 655 meters.

**California Orcutt grass** (*Orcuttia californica*) is a state and federally listed endangered species and a CRPR 1B.1 listed species. California Orcutt grass is an annual grass that is native to California. This species is associated

with deep, ephemeral vernal pools underlain by clay soils and has been found at elevations between 10 and 660 meters.

**Lyon's pentachaeta** (*Pentachaeta lyonii*) is a state and federally listed endangered species and a CRPR 1B.1 listed species. Lyon's pentachaeta is an annual herb that is endemic to California. This species is associated with openings in chaparral, coastal scrub, and valley and foothill grassland habitats and has been found at elevations between 30 and 670 meters. It typically occurs in compact soil and exposed, rocky clay soils.

### Special-Status Wildlife

Special-status wildlife species include those classified as endangered or threatened, proposed or candidate species for listing by the USFWS or CDFW, or considered a CDFW Fully Protected (FP) or Species of Special Concern (SSC).

Thirty special-status wildlife species known to occur or have occurred in the vicinity of the Study Area were identified by the CNDDB and USFWS IpaC searches. Of the thirty special-status species, five were identified by an informal review of the IpaC database. The table, labeled Appendix C, for wildlife with potential to occur in the Study Area (in Appendix C) summarizes the special-status wildlife species, their associated habitats, general location information for previously documented occurrences in the Study Area, and probability of occurrence within the Study Area. However, this table should not be considered a complete list of special-status wildlife species that may occur within the Study Area. Other species not identified in the literature review may occur in the Study Area presently or in the future. For each special-status wildlife species listed, a determination was made regarding potential use within the Study Area based on information gathered during the literature review, such as location of the Study Area, vegetation communities and soils potentially present, and each species' known range, habitat preferences, and knowledge of the species' distributions in the area. Wildlife species listed or proposed for listing under FESA and/or CESA are discussed in more detail below.

**Riverside fairy shrimp** (*Streptocephalus woottoni*) was listed as federally endangered in 1993. Riverside fairy shrimp are associated with coastal scrub and grassland habitats and are found in moderately deep vernal pools or ephemeral ponds. Riverside fairy shrimp are found in Ventura, Riverside, Orange, and San Diego Counties and therefore, have not been recorded in the Planning Area.

**Crotch bumble bee** (*Bombus crotchii*) is a state candidate endangered species as of 2019. This species is known to inhabit open grassland and scrub habitats. It occurs primarily in California, including the Mediterranean region, Pacific Coast, Western Desert, Great Valley, and adjacent foothills through most of southwestern California (ECORP 2024). The Planning Area occurs within the current range for this species.

**Monarch butterfly** (*Danaus plexippus*) is a USFWS candidate federally listed butterfly species. The monarch is currently slated to be listed in 2024. Monarchs occur throughout a variety of habitats in North America and can be found along roadsides, open areas, and urban gardens. Key habitat requirements of monarchs include their host plant for reproduction, nectar sources for adults, and forested groves providing a suitable microclimate that protects from the elements during the winter. Milkweeds (*Asclepias* spp.) are the host plant for this species and are used for sheltering eggs and feeding larvae.

**El Segundo blue butterfly** (*Euphilotes allyni*) was listed as endangered in 1976 with threats to the species including urban development and invasion of exotic species. It is endemic to coastal sand dunes, which have declined severely due to coastal development. They are restricted to coastal Los Angeles County, extending from the Ballona Wetlands south to the Palos Verdes Peninsula.

**Tricolored blackbird** (*Agelaius tricolor*) was listed by CDFW as threatened in March of 2019 and is also a California SSC. The tricolored blackbird is a medium-sized songbird exhibiting sexually dimorphic characteristics in both size and plumage coloration. The males are larger and have a black plumage with a bright red and white shoulder patch, while females are smaller and have a sooty brown-black plumage and a smaller reddish shoulder-patch. In California, tricolored blackbird breeding habitat primarily consists of wetlands with cattails (*Typha* spp.), bulrushes (*Schoenoplectus* spp.), and willows (*Salix* spp.), but they have also been documented nesting in agricultural fields, upland shrubs, and thistles. There have been historic observations of colonies in the Planning Area.

**Swainson's hawk** (*Buteo swainsoni*) is a state-listed threatened species as determined by the California Fish and Game Commission in 1983. It prefers savanna, open woodlands, and cultivated lands. Its diet consists mainly of mammals and other vertebrates, but it will also eat various insects during the non-breeding season. It prefers to nest in open, riparian habitat with scattered trees or small groves in sparsely vegetated flatlands.

**Western snowy plover** (*Charadrius nivosus nivosus*) is currently listed as a threatened species under the federal Endangered Species Act (1993) but is not listed under the California Endangered Species Act. The coastal and interior populations are considered CDFW SSC. As of June 2018, the species listing is currently under a five-year review by the USFWS. Along the Pacific Coast, snowy plovers breed from southern Washington to Baja Sur, Mexico south to coastal Ecuador and Chile. Nesting occurs on barren to sparsely vegetated sand beaches, dry salt flats, dredge spoils deposited on beach or dune habitat, levees and flats at salt-evaporation ponds, and sand/cobble river bars. Nesting occurs during March through September. The Planning Area does not provide suitable habitat for this species.

**Southwestern willow flycatcher** (*Empidonax traillii extimus*) is a state and federally listed endangered species that breeds in dense riparian vegetation along rivers and streams in the southwestern United States from May through September. This species is associated with riparian woodland and forests. They construct nests in dense thickets of willows, mulefat (*Baccharis salicifolia*), and other trees and shrubs approximately four to seven meters in height. They virtually always nest near surface water or saturated soil. Southwestern willow flycatchers have not been recorded in the Planning Area or vicinity of the Planning Area.

**California black rail** (*Laterallus jamaicensis coturniculus*) is listed as threatened and a federally protected species (FP) under the California Endangered Species Act. It is one of two subspecies of the Black Rail. It winters in California, along the Gulf coast in salt marsh habitat. It is a tiny, blackish rail, with a small black bill, a back speckled with white, and a chestnut nape.

**Belding's savannah sparrow** (*Passerculus sandwichensis beldingi*) is listed as endangered under the California Endangered Species Act and is a USFWS Bird of Conservation Concern. This ground dwelling species is a year-round resident of the coastal marshes of southern California. It nests in pickleweed (*Salicornia* spp.) and

forages on mudflats, beaches, rocks, and vegetation within salt marshes. The species is present in the Ballona Wetlands but does not occur throughout the Planning Area.

**Coastal California gnatcatcher** (*Polioptila californica californica*) is a federally listed threatened species and a CDFW SSC. Coastal California gnatcatcher is an obligate permanent resident of sage scrub habitat below 765 meters in southern California. This species is found in sage scrub in arid washes, on mesas, and on slopes. Coastal California gnatcatcher has been documented in several locations throughout the Planning Area, particularly in the Kenneth Hahn State Recreation Area (KHSRA).

**Bank swallow** (*Riparia riparia*) is a state-listed threatened species. Bank swallow is a colonial nester and is associated with riparian and lowland habitats west of the desert. It requires vertical banks or cliffs with fine-textured, sandy soils near streams, rivers, lakes, or ocean for nesting. Bank swallows have not been documented in the Planning Area.

**California least tern** (*Sterna antillarum browni*) is a federally listed endangered species. The species has a short, forked tail, and a long, slightly decurved, tapered bill. Males and females have a black cap, gray wings with black wingtips, orange legs, and a black-tipped yellow bill. They breed along the Pacific coast from northern California to Baja California Sur and nest from mid-April to mid-September in colonies of typically 15 to 300 pairs.

**Least Bell's vireo** (*Vireo bellii pusillus*) is a state- and federally listed endangered species. This species inhabits riparian woodland habitats consisting of cottonwoods (*Populus* spp.), willows, and mulefat. Least Bell's vireo is found in areas with a dense shrub cover and a dense, stratified canopy. Nests occur in dense thickets of willow or mulefat, one or two meters from the ground. Least Bell's vireo has been documented in the Ballona Wetlands, but not in the Planning Area.

**Pacific pocket mouse** (*Perognathus longimembris pacificus*) is a federally endangered species with four distinct populations within California. It is primarily associated with sandy soils in a range of habitats with open vegetation structures such as dunes, strands, mesas, and drainages. They are threatened by habitat fragmentation and small population sizes.

## Sensitive Natural Communities

Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects from projects. These communities may or may not contain special status plants or their habitat. While much of the Study Area is categorized as disturbed or developed, six sensitive vegetation communities that have been previously mapped within the Study Area are designated as sensitive (CDFW 2023a). These are all located in the Ladera Heights, View Park, and Windsor Hills communities. There are no sensitive communities present in other parts of the Planning Area, other than Ballona Wetlands (a SEA), Santa Monica Mountains, El Segundo Dune, and Marina del Rey, which are not subject to changes as part of the WSAP. The Planning Area likely includes vegetation communities other than those described below in this assessment that may also be considered sensitive natural communities by CDFW. Sensitive vegetation communities are described below.

**California sycamore woodland alliance** is a riparian woodland dominated by California sycamore (*Platanus racemosa*) with wetland understory indicators. Other trees present may include coast live oak (*Quercus agrifolia*), white alder (*Alnus rhombifolia*), Southern California black walnut (*Juglans californica*), Fremont cottonwood (*Populus fremontii*), California bay laurel (*Umbellularia californica*), and willow species. This vegetation community occurs at elevations between 0 and 2,400 meters and is found in gullies, intermittent streams, springs, seeps, streambanks, and terraces adjacent to floodplains that are subject to flooding and seasonal saturation. Soils are rocky or cobbly alluvium.

**California walnut woodland alliance** is described as an open to continuous tree canopy that is locally dominated by Southern California walnut. The open tree canopy allows development of a grassy understory (Holland 1986). This vegetation community occurs at elevations between 150 and 900 meters and is found in riparian corridors, and most commonly, hillslopes.

**Coastal prickly pear succulent scrub alliance** is characterized by a shrub community with an intermittent or continuous canopy, less than two meters in height, dominated by coast prickly pear (*Opuntia littoralis*). Other characteristic shrubs include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), and blue elderberry (*Sambucus mexicana*). The herbaceous layer is open to continuous and diverse. This alliance occurs at elevations below 1,200 meters and is often found on steep, south-facing slopes, and headlands with low water-holding capacity.

**Giant wildrye grassland alliance** is characterized by an open to intermittent herbaceous layer dominated by giant wildrye (*Elymus condensatus*). Other associates may include wild oat (*Avena* spp.) and mustard species. This alliance occurs on somewhat steep, often northerly slopes at elevations between 0 to 1500 meters.

**Lemonade berry scrub alliance** is characterized by a two-tiered, open to continuous shrub canopy, dominated by lemonade berry (*Rhus integrifolia*). Other shrub associates may include California sagebrush, California buckwheat, and cacti. Scattered species of trees, including Southern California walnut and coast live oak, may occur. The herbaceous layer is open. This shrubland occurs on gentle to abrupt slopes, at elevations between 5 to 750 meters.

**White sage scrub alliance** is characterized by a two-tiered intermittent to continuous canopy dominated by white sage. Other co-dominants in the shrub canopy include California sagebrush, California buckwheat, chaparral yucca (*Hesperoyucca whipplei*), and Menzies' goldenbush (*Isocoma menziesii* var. *menziesii*). This alliance occurs on dry slopes, benches, and rarely flooded low-gradient deposits along streams. The elevation range is 300 to 1600 meters.

### Wildlife Movement Corridors

Wildlife corridors are linear landscape elements that provide for wildlife species movement and dispersal between two or more habitats. Wildlife corridors contribute to population viability by assuring continual exchange of genes between populations, providing access to adjacent habitat areas for foraging and mating, and providing routes for recolonization of habitat after local displacement or ecological catastrophes (e.g., fires). Wildlife corridors may be bound by development or areas unsuitable for wildlife, but could contain enough food, cover, and/or water to facilitate wildlife movement between habitat patches and prevent isolation of

populations. Travel routes are landscape features (i.e., ridgelines, drainages, canyons, or riparian areas) that are used by wildlife to gain access to essential resources. Areas adjoining two habitats are also often referred to as habitat linkages.

A statewide interagency workshop was conducted in 2000 to delineate habitat linkages critical for preserving the State's biodiversity. No habitat linkages were identified in the Planning Area. Furthermore, CDFW's Conservation Analysis Unit designated the Los Angeles City area as having limited connectivity opportunity in August 2019. While there is open space in the Planning Area within the Baldwin Hills/Inglewood Oil Fields and KHSRA, these areas are highly disturbed, managed, and isolated, providing limited to no broader wildlife connectivity opportunities.

### Jurisdictional Waters and Wetlands

Aquatic resources that meet the definition of Waters of the United States fall under the jurisdiction of the USACE and are subject to regulation under Section 404 of the CWA. Waters of the United States are also subject to regulation by the RWQCB under Section 401 of the CWA. Some aquatic resources that are excluded from the definition of Waters of the United States and not regulated under the CWA, such as isolated wetlands and manmade water features, may still be regulated at the state level by the RWQCB and/or the CDFW.

Discharge of waste to Waters of the State, defined as "any surface water or groundwater, including saline waters, within the boundaries of the state," is regulated by the RWQCB under the Porter-Cologne Water Quality Control Act.

Aquatic resources under the jurisdiction of the CDFW include the definable bed, bank, or channel, areas of rivers, streams, and lakes that support periodic or intermittent flows, perennial flows, subsurface flows, support fish or other aquatic life and areas that support riparian or hydrophytic vegetation in association with a streambed. This includes areas where waters flow as well as surrounding vegetation that is riparian in nature or tied hydrologically to the associated aquatic feature.

The Study Area is located within one watershed: Ballona Creek (Hydrologic Unit Code [HUC] 180702030508). The Ballona Creek watershed is highly developed and totals approximately 130 square miles. It drains the Los Angeles basin from the Santa Monica Mountains to the north, I-110 to the east, and Baldwin Hills to the south. The major tributaries include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and several storm drains.

Open water occurs on the northern boundary of the Study Area with Centinela Creek located south of the Marina Freeway. A formal study to delineate aquatic resources within the Study Area was not conducted. However, aquatic features that are potentially under the jurisdiction of the USACE and the CDFW were identified within the Study Area using information obtained from the USFWS NWI database.

A formal study to delineate aquatic resources within the Study Area was not conducted. However, aquatic features that are potentially under the jurisdiction of the USACE and the CDFW were identified within the Planning Area using information obtained from the USFWS NWI database.

## Significant Ecological Areas and Coastal Resource Areas

Significant Ecological Areas (SEAs) are officially designated areas in the General Plan that have been identified as having irreplaceable biological resources. Each SEA has been configured to support sustainable populations of the biological resource located in that SEA and includes undisturbed to lightly disturbed habitat along with linkages and corridors to promote species movements. The objective of the SEA Program is to conserve genetic and physical diversity by designating biological resource areas that are capable of sustaining themselves into the future. Each SEA is sized to support sustainable populations of its component species and includes undisturbed or lightly disturbed habitat along with linkages and corridors that promote species movement.

Coastal Resource Areas (CRA) include biological resources equal in significance to SEAs, but because they occur in the coastal zone, they fall under the authority of the California Coastal Commission. Ecological resources of CRAs are protected by specific provisions within an area's certified local coastal program. SEA ordinances do not apply to CRAs.

The Planning Area has three designated SEA/CRAs, including the Ballona Wetlands, portions of the Santa Monica Mountains, and El Segundo Dunes (DRP 2015). The Ballona Wetlands are an officially designated SEA that falls under the CRA and are an important coastal ecological area located south of Marina del Rey. The Ballona Wetlands are one of the three remaining remnants of salt march in the County and are home to many sensitive plant and wildlife species. The Ballona Wetlands are governed by separate planning processes and are not anticipated to change as part of the proposed Project.

The portions of the Santa Monica Mountains within the Planning Area are an officially designated SEA that falls under the CRA. The Santa Monica Mountains are part of the National Park System and is managed by the National Park Service. The recreation area preserves natural habitats, historical and cultural sites, offers recreational opportunities, and improves the air quality for the Los Angeles basin. The Santa Monica Mountains is covered by chaparral, oak woodlands, and coastal sage scrub (DRP 2015). The Santa Monica Mountains are governed by separate planning processes and are not anticipated to change as part of the proposed Project.

The El Segundo Dunes are an officially designated SEA that falls under the CRA. The El Segundo Dunes are the largest remaining representation of coastal dune community in Southern California. The 302-acre dune site is owned and managed by the Los Angeles World Airports (LAWA) and provides habitat for over 900 species. (BF 2024). The El Segundo Dunes are governed by separate planning processes and are not anticipated to change as part of the proposed Project.

## Habitat Management Plans

A Habitat Conservation Plan (HCP) is a federal planning document that guides the protection and enhancements of habitats on private land for endangered or threatened species. A non-federal entity (i.e., private companies, local or state governments, landowner) must develop a conservation plan, apply for an incidental take permit, and implement the project as specified in their permit. Ideally, an HCP will benefit wildlife conservation and community needs simultaneously. A Natural Community Conservation Plan is the state operated counterpart of the HCP. No CDFW permitted Natural Community Conservation Plans (NCCPs) or Habitat Conservation Plans (HCPs) occur within the Planning Area.

## Inglewood Oil Field

The Inglewood Oil Field, a privately held property, is a prominent feature of the community of Ladera Heights and has been in operation since 1924 with at one point over 1,600 wells that will be phased out of operation over time. A portion (approximately 639 acres) of the Inglewood Oil Field within the community stretches from the northern border to the middle of the community.

### *Vegetation*

The terrain of the Inglewood Oil Field is characterized as gently rolling hills with native and non-native vegetation. Much of the oil field is disturbed or degraded due to past and present oil field operations. Weed-dominated habitats are common on the field in the more active and disturbed areas. There is heavy development of the active surface of the field with private roads, wells, pipelines, tankage, and associated ancillary equipment required to operate the field.

Wetland and riparian habitats are present within the Inglewood Oil Field. However, human disturbances have reduced the extent and plant species composition of riparian communities. Natural riparian and wetland communities have been replaced by artificial aquatic and riparian habitats maintained by artificial watering regimes such as park maintenance, urban runoff, and industrial activities. Most of the wetlands and riparian areas within the Inglewood Oil Field are associated with man-made or altered natural streams, drainage channels, and retention basins. The vegetation types expected to occur within the Inglewood Oil Field are discussed below.

#### *Scrub Habitats*

Scrub habitats expected to occur on the Inglewood Oil Field such as California sagebrush scrub, and California sagebrush/California buckwheat scrub consist of dominant species such as California sagebrush (*Artemesia californica*), California buckwheat (*Eriogonum fasciculatum*), coyote bush (*Baccharis pilularis*), bush sunflower (*Encelia californica*), and deer weed (*Lotus scoparius*). Other less common species found include mock heather (*Ericameria ericioides*), sticky monkey flower (*Mimulus aurentiacus*), black sage (*Salvia mellifera*), giant wild rye (*Leymus condensatus*) and toyon (*Heteromeles arbuitifolia*). Disturbed or degraded scrub habitats occur where previous oil field operations have disturbed the area by brush clearing or trampling. A higher (50 percent or greater) component of non-native species [e.g., castor bean (Ricinus communis), and wild oat (*Avena* spp.)] occur in these areas (Culver City 2017).

#### *Grassland Habitats*

Grassland habitats expected to occur include native dominated types such as giant wild rye grassland and needle grass grassland, as well as non-native dominated types such as annual brome – wild oats grassland. Giant wild rye grassland is dominated by giant wild rye and contains other species such as needlegrass (*Stipa* sp.), ripgut grass (*Bromus diandrus*), and scattered coyote brush. Needle grass grassland is characterized by greater than ten percent cover of needlegrass. Other species present include fascicled tarplant (*Deinandra fasciculata*), ripgut grass, wild oat, and scattered California buckwheat. Annual brome–wild oats grassland is dominated by a mix of ripgut grass and wild oat. Some areas contain lesser amounts of Italian ryegrass (*Festuca perennis*), castor bean, and crown daisy (*Glebionis coronaria*) (Culver City 2017).

### *Herbaceous Habitats*

Herbaceous habitats such as ruderal or weed dominated areas, and non-native ice plant dominated areas contain primarily non-native invasive and non-invasive plant species. Dominant species in these areas include mustards (*Brassica nigra, Hirschfelia incana*), iceplant (*Carpobrotus edulis*), fennel (*Foeniculum vulgare*), Bermuda grass (*Cynodon dactylon*), and wild radish (*Raphanus sativus*). A giant reed stand occurs as a small patch and consists of giant reed (*Arundo donax*) an invasive non-native species. (Culver City 2017)

### *Trees*

Tree dominated areas include Eucalyptus naturalized forest and ornamental. Eucalyptus naturalized forest primarily consists of stands of eucalyptus trees (Eucalyptus spp.) and groups of planted trees that include both native and ornamental species. Ornamental areas contain landscaped gum tree windrows (Eucalyptus spp.) adjacent to roads (Culver City 2017).Special Status Vegetation Types and Plant Species

Three vegetation types that have been mapped on the Inglewood Oil Field and are considered special status include: California sagebrush scrub, giant wild rye grassland, and needle grass grassland. Additionally, degraded or disturbed scrub habitat may potentially be considered special status. Vegetation mapping of unmapped areas on the Inglewood Oil Field may potentially include additional special status vegetation types, but the likelihood is low (Culver City 2017).

Several special status plant species have the potential to occur on the Inglewood Oil Field, including South coast saltbush, Plummer's mariposa lily, southern tarplant, Rock lettuce (*Dudleya lanceolata*), mesa horkelia (*Horkelia cuneata* var. *puberula*), Southern California black walnut, Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*), Brand's star phacelia (*Phacelia stellaris*), and San Bernardino aster (*Symphyotrichum defoliatum*) (Culver City 2017).

## *Wildlife*

The majority of habitat on the Inglewood Oil Field is fragmented and isolated by oil field operations. Although the habitat fragments are surrounded by urban development and human influence, these habitats support native animal species, including hundreds of insects, at least 12 species of reptiles and amphibians, over 166 species of birds and 21 species of mammals; however, not all of these species are expected to be present on the Inglewood Oil Field. (Culver City 2017) Common wildlife species potentially occurring on the Inglewood Oil Field are discussed below.

### *Fish*

The only natural water features expected to occur are ephemeral drainages with no substantial water flow other than during rainfall events and holding basins. Therefore, there is no habitat for fish species and no fish species are expected to occur on the Inglewood Oil Field (Culver City 2017).

### *Amphibians*

Amphibians require moisture for at least a portion of their life cycle and many require standing or flowing water for reproduction. Terrestrial species may or may not require standing water for reproduction. Considering

the lack of natural water features and associated habitat expected to occur on the Inglewood Oil Field, it is not likely that substantial populations of any amphibian species would be supported on the Inglewood Oil Field. Common species that could potentially occur on the Inglewood Oil Field in small numbers include Baja California chorus frog (*Pseudacris hypochondriaca*), western toad (*Anaxyrus boreas*), and American bullfrog (*Lithobates catesbeiana*) (Culver City 2017).

### *Reptiles*

Although suitable reptile habitat is expected to occur on the Inglewood Oil Field, associated habitat areas are isolated geographically due to surrounding development (residential and oil field). This being the case, species diversity and abundance are expected to be low. Reptile species expected to occur on the Inglewood Oil Field include western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), southern alligator lizard (*Elgaria multicarinata*), and gopher snake (*Pituophis catenifer*). (Culver City 2017)

### *Birds*

A variety of bird species are expected to be residents on the Inglewood Oil Field using the habitats throughout the year. Other species are present only during certain seasons due to migration and/or breeding habits. Species expected to occur in the scrub portions of the Inglewood Oil Field include Bewick's wren (*Thryomanes bewickii*), spotted towhee (*Pipilo maculatus*), blue-gray gnatcatcher (*Polioptila caerulea*), California towhee (*Pipilo crissalis*), Anna's hummingbird (*Calypte anna*), northern mockingbird (*Mimus polyglottos*), house wren (*Troglodytes aedon*), and house finch (*Carpodacus mexicanus*). Bird species that are expected to occur in the denser more wooded areas include American kestrel (*Falco sparverius*), lesser goldfinch (*Carduelis psaltria*), song sparrow (*Melospiza melodia*), house finch, mourning dove (*Zenaida macroura*), western scrub-jay (*Aphelocoma coerulescens*), bushtit (*Psaltriparus minimus*), phainopepla (*Phainopepla nitens*), Bullock's oriole (*Icterus bullockii*) and Wilson's warbler (*Wilsonia pusilla*). The eucalyptus groves scattered throughout the Inglewood Oil Field provide suitable habitat for nesting raptors, such as the great horned owl (*Bubo virginianus*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), and Cooper's hawk (*Accipiter cooperi*) (Culver City 2017).

The annual grassland vegetation type supports fewer bird species than most other vegetation types on the Inglewood Oil Filed. Mourning dove, black phoebe (*Sayornis nigricans*), and lesser goldfinch are year-long residents in these areas. Migratory birds are expected to use this vegetation type on the Inglewood Oil Field either during the summer or winter. Additional species with potential to occur in one or more of the vegetation types on the Inglewood Oil Field include California quail (*Callipepla californica*), Say's phoebe (*Sayornis saya*), and turkey vulture (*Cathartes aura*) (Culver City 2017).

### *Mammals*

The presence of different vegetation types on the Inglewood Oil Field offers mammals a variety of habitats However, due to fragmentation from other open spaces and lack of suitable corridors to connect them, it is not expected that large populations will be present, nor will the diversity be as great as other areas of this size and habitat type that have access to adjacent open space. (Culver City 2017)

Small, ground-dwelling mammals expected on the Inglewood Oil Field include the California pocket mouse (*Perognathus californicus*), California mouse (*Peromyscus californicus*), woodrat (Neotoma sp.), Botta's pocket gopher

(*Thomomys bottae*), deer mouse (*Peromyscus maniculatus*), house mouse (*Mus musculus*), California ground squirrel (*Spermophilus beecheyi*), cottontail rabbit (*Sylvilagus audubonii*), brush rabbit (*Sylvilagus bachmani*), western gray squirrel (*Sciurus griseus*), and eastern fox squirrel (*Sciurus niger*). Larger mammals, including both herbivores and carnivores, that are expected on the Inglewood Oil Field include the striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), common raccoon (*Procyon lotor*), coyote (*Canis latrans*), and feral cat (*Felis catus*) (Culver City 2017).

### *Special Status Wildlife Species*

Several special status wildlife species have the potential to occur on the Inglewood Oil Field, including silvery legless lizard (*Aniella pulchra pulchra*), coast horned lizard (*Phrynosoma coronatum* ssp. *Blainvillii*), northern harrier (*Circus cyaneus*), Coastal cactus wren (*Campylorhynchus brunneicapillus couesi*), peregrine falcon (*Falco peregrinus anatum*), loggerhead shrike (*Lanius ludovicianus*), coastal California gnatcatcher (*Polioptila californica californica*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), big free-trailed bat (*Nyctinomops macrotis*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and Los Angeles pocket mouse (*Perognathus longimembris Brevinasus*) (Culver City 2017).

#### *Species of Local Concern*

The urbanization of the area surrounding the Inglewood Oil Field extirpated many species from the Project area that were once very common and are still common in open space areas in the region. These species still occur in the Baldwin Hills in low numbers, and are at risk of extirpation from the area due to human disturbance, limited native habitats, indirect disturbances from the surrounding urban landscape, among other causes. These species include the greater roadrunner (*Geococcyx californianus*), blue grosbeak, Swainson's thrush (*Catharus ustulatus*), and California thrasher (*Toxostoma redivivum*). Most of these species would be expected to use the site infrequently as migrants due to the low quality of potential nesting habitat expected to occur on the Inglewood Oil Field (Culver City 2017).

### *Wildlife Movement*

The Baldwin Hills, which includes the Inglewood Oil Field, is the largest area of open space in the Los Angeles Basin. Animals living in the Inglewood Oil Field may potentially use the various canyons, ridgelines, habitats and other linear features to travel locally within the hills of the site. Most large-scale regional wildlife movement between the Baldwin Hills and the open spaces beyond the Los Angeles Basin is expected to be restricted to avian movement due to the surrounding urban development and lack of suitable habitat (Culver City 2017).

The north-south trending hilltops and canyon gullies on the Inglewood Oil Field may be used as a wildlife corridor by many small mammals and herpetofauna (amphibians and reptiles). Drainages adjacent to the site, including Ballona Creek, are largely cement bottom and generally lack native riparian vegetation; therefore, they are not expected to be highly utilized in terms of local corridors within or outside the Inglewood Oil Field. Wildlife species expected to use the open spaces on the Inglewood Oil Field for local movement include, but are not limited to, small- to medium-sized animals such as raccoons, rabbits, snakes and lizards (Culver City 2017).

*Jurisdictional Resources*

Jurisdictional features may occur on the Inglewood Oil Field based on previous vegetation mapping of open water areas and other topographic features visible on aerial photographs (Culver City 2017).

## 5.4.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

B-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

B-3 Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

B-4 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.).

B-5 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.

B-6 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

B-7 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

## 5.4.3 Environmental Impacts

### 5.4.3.1 METHODOLOGY

The following impact analysis is based on existing biological resources located within the unincorporated communities of Ladera Heights, View Park, Windsor Hills, and West Fox Hills of the Planning Area. Biological resources evaluated included sensitive habitats, special-status plant and animal species, and potential for wildlife movement corridors and were based on a literature review from database research results. Information regarding biological resources within the Study Area was obtained from a search of sensitive species databases,

a review of pertinent literature, prior environmental documents, and aerial photographs. The main sources of information are listed below. Biological information obtained from these sources was utilized to perform a programmatic evaluation of existing biological conditions and identify sensitive biological resources that have the potential to occur. Literature reviews were not conducted for the Ballona Wetlands Area, given the complexity of the natural resources and the fact that no changes are proposed to this area as part of the WSAP.

### Databases

Databases reviewed for this report included:

- Calflora Plant Database (Calflora 2023)
- CDFW California Natural Diversity Database (CNDDB, CDFW 2023b)
- California Native Plant Society's (CNPS) Electronic Inventory (CNPS 2023)
- U.S. Department of Agriculture (USDA) Region 5 Classification and Assessment with Landsat of Visible Ecological Groupings (CalVeg, USDA 2023)
- USDA Natural Resources Conservation Web Soil Survey (USDA 2023)
- USFWS Information Planning and Consultation (IpaC) System (USFWS 2023a)
- USFWS National Wetland Inventory (NWI, USFWS 2023b)
- U.S. Geological Survey (USGS) Science in Your Watershed (USGS 2023)

Literature reviewed for this report included:

- Ballona Creek Watershed Notice of Intent (Ballona Creek Watershed, July 2013)
- Ballona Wetlands Ecological Reserve Comprehensive 5-Year Monitoring Report (Johnston, K.K., et. al, 2015).
- Birds of the Baldwin Hills (Garrett, Kimball L. 2001)
- CDFW's List of California Terrestrial Natural Communities (CDFW 2023c)
- California Terrestrial Habitat Connectivity Figure (CDFW, August 2019)
- Urban Biodiversity Assessment: Baldwin Hills Biota Update (Longcore, T., et al, 2016).
- Westside Planning Area, Figures 5.45 and 5.46 (Department of Regional Planning, October 2014).

### 5.4.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.1.** Focus growth and the development of new commercial and housing as infill and re-use of commercial corridors and centers, while supporting current businesses and preserving the character of existing residential neighborhoods, parklands, and open spaces.
- **Policy LU 2.5.** Anticipate and plan for the long-term redevelopment of the Inglewood Oil Field and ensure that future uses are integrated and connected to the existing community.

**Goal LU 3:** A community of distinct and livable places.

- **Policy LU 3.2.** Locate and design development to respect the area's natural landforms and open spaces.

**Goal LU 8:** A sustainable built environment

- **Policy LU 8.1.** Ensure that new development is located and designed to respect natural landforms and topography and protect native ecologies, wildlife, and open spaces.

**Goal LU 22 (Inglewood Oil Field).** Redevelopment of the Inglewood Oil Field with Uses Contributing to the Quality of Life of Community Residents

- **Policy LU 22.3.** Enable the community to be actively involved in the determining and planning for uses to be developed as replacement of existing Oil Field operations.
- **Policy LU 22.4.** Provide for the linkage of new uses to the existing community with pedestrian and bicycle paths, greenways, and other elements.
- **Policy LU 22.5.** Provide for the restoration of native vegetation and landscapes and integrate with development.

#### Conservation and Open Space Element

**Goal COS 1:** The natural environment and natural resources are sustained for enjoyment and equitable use by future generations of Westside residents.

- **Policy COS 1.1.** Provide public access and educational resources equitably for residents at open spaces and natural areas that are habitats for sensitive species, wherever feasible and applicable in accordance with the recommendations of PNA+.

- **Policy COS 1.3.** Prioritize protecting, conserving, and restoring the natural resources and habitats at the Ballona Wetlands, an area of great ecological importance.

**Goal COS 2:** Biological, natural, and open space resources are protected, conserved, and enhanced.

- **Policy COS 2.1.** Protect suitable nesting habitats in open spaces for native migratory and resident bird species, including owls and raptors in Ladera Heights, View Park-Windsor Hills, and West Fox Hills wherever they are found or have been known to occur.

- **Policy COS 2.2.** Preserve Kenneth Hahn State Recreation Area and surrounding open spaces as valuable outdoor space for humans, animals, and plants.

- **Policy COS 2.3.** Explore opportunities to rewild the Centinela Creek Channel north of West Fox Hills through collaboration with agencies such as the City of Los Angeles and Los Angeles County Flood Control District.

**Goal COS 3:** The Inglewood Oil Field is transformed into a public and environmental asset.

- **Policy COS 3.1.** Incorporate open space preservation, habitat restoration, and the provision of new recreational opportunities into plans for the future re-use of the Inglewood Oil Field.

- **Policy COS 3.3.** When feasible, restore native species vegetation of the Inglewood Oil Field to provide new habitats for special status species (rare, threatened, or endangered) that may be found on-site.

**Goal COS 5:** The Westside's scenic resources and natural features are protected from adverse impacts.

- **Policy COS 5.1.** Require new development to respect, integrates with, and complements the natural features of the land including conforming building massing to topographic forms, restricting grading of steep slopes, and encouraging the preservation of visual horizon lines and significant hillsides as prominent visual features.

**Implementation Program COSI 1:** Conduct an evaluation of the appropriateness, impacts, and adequacy of existing entrances, roads, and trails that provide public access to areas containing sensitive biological resources. Where adverse resource impacts are identified, modify or otherwise remove the access, and, where suitable, identify and design additional means of access that is not disruptive and maintains the integrity of the resource.

**Implementation Program COSI 2:** Support the California Department of Fish and Wildlife's implementation of the plan for the protection, conservation, and restoration of the Ballona Wetlands.

**Implementation Program COSI 3:** Work with the City of Los Angeles and Los Angeles County Flood Control District in analyzing the feasibility of and, if appropriate, develop a plan and funding mechanism for the rewilding of the Centinela Creek Channel.

### 5.4.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.4-1: Would the Project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? [Threshold B-1]**

**Less Than Significant Impact.** The WSAP is a long-range policy document and does not include specific projects that would have adverse impacts on special-status species and their habitat. Land use changes and zoning updates (12 Opportunity Sites[2]) under the WSAP would be targeted near planned or existing commercial corridors and residential neighborhoods that are consistent with goals and policies of the General Plan. Depending on the location of development of future projects, construction could result in impacts to candidate, sensitive, or special status species.

*Special Status Plants*

As identified in the table labeled Appendix B in Appendix C of this Draft PEIR, three special status species (southern tarplant, Coulter's goldfields, and Nuttall's scrub oak) have a low to moderate potential to occur within the Planning Area. However, due to the developed nature of the 12 Opportunity Sites and Inglewood Oil Field, the primary habitats associated with the southern tarplant, Coulter's goldfields, and Nuttall's scrub oak are not likely to be present. Notwithstanding, future development facilitated by the proposed Project would be required to comply with all applicable regulations including the Federal Endangered Species Act, California Endangered Species Act, California Fish and Game Code, and County Code. Additionally, all future discretionary projects within the Planning Area that are subject to CEQA would be required to conduct site-specific environmental assessments, including impacts to biological resources. As part of the future project-level environmental review process, the County biologist would be consulted (as needed) to examine potential impacts to biological resources, including species status species; require biological surveys (if necessary); and recommended mitigation measures (as appropriate) to reduce impacts.

*Special Status Wildlife*

As identified in the table labeled Appendix C in Appendix C of this Draft PEIR, nine special status species (Crotch bumble bee, monarch, southern California legless lizard, two-striped gartersnake, tricolored blackbird, burrowing owl, coastal California gnatcatcher, least Bell's vireo, pallid bat, and silver-haired bat) have a low to high potential to occur within the Planning Area. Due to the developed nature of the 12 Opportunity Sites and Inglewood Oil Field, the primary habitats associated with the Crotch bumble bee, monarch, southern California legless lizard, two-striped gartersnake, tricolored blackbird, burrowing owl, coastal California gnatcatcher, least Bell's vireo, pallid bat, and silver-haired bat are not likely to be present. Special-status bird species may pass

[2] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

through the 12 Opportunity Sites and Inglewood Oil Field during migration and foraging, but nesting habitat for these species are likely limited or not present. Notwithstanding, future development facilitated by the proposed Project would be required to comply with all applicable regulations including the Federal Endangered Species Act, California Endangered Species Act, California Fish and Game Code, and County Code. Additionally, all future discretionary projects within the Planning Area that are subject to CEQA would be required to conduct site-specific environmental assessments, including impacts to biological resources. As part of the future project-level environmental review process, the County biologist would be consulted (as needed) to examine potential impacts to biological resources, including species status species; require biological surveys (if necessary); and recommended mitigation measures (as appropriate) to reduce impacts.

*Conclusion*

There are no proposed changes resulting in increases to intensity to the existing zoning or land use intensities within the Ballona Wetlands, Santa Monica Mountains, El Segundo Dunes, coastal areas in Marina del Rey, within the Inglewood Oil Field, or in the hillside/open space areas that support sensitive habitat. Future individual projects would undergo site-specific review and, as appropriate, mitigate potential significant impacts to candidate, sensitive, or special status species. Furthermore, implementation of individual projects implementing the WSAP's goals, policies, strategies, and implementation actions would be subject to policies included in the General Plan, as well as other local, State, and federal regulations regarding candidate, sensitive, or special status species. WSAP Goal COS 1-2 ensures that biological, natural, and open space resources are protected and conserved. Policy COS 1.1 encourages access to the public and educational resources for sensitive species habitats in the Study Area. Due to the location and highly disturbed and/or developed nature of the 12 Opportunity Sites and Inglewood Oil Field which is not undergoing land use or zoning changes are part of the proposed Project, future projects facilitated by the WSAP are unlikely to result in substantial effects on special-status species and/or their habitats that cannot be reduced through project-level mitigation for future projects. Therefore, buildout of the WSAP would result in less than significant impacts on special-status species and/or their habitats.

**Impact 5.4-2: Would the Project Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? [Threshold B-2]**

**Less Than Significant Impact.** The Study Area, including the 12 Opportunity Sites and Inglewood Oil Field, is situated within a highly developed and urbanized part of the County. There are six sensitive natural communities present in the Study Area, all located in the Ladera Heights, View Park, and Windsor Hills community within Baldwin Hills/Inglewood Oil Fields and KHSRA. Given the location of the proposed land use and zoning changes within developed infill locations and along major transportation arterials, there is remote potential that implementation of the proposed Project would result in impacts to riparian or other sensitive natural communities. There are no proposed changes resulting in increases to intensity to the existing zoning or land use intensities within the Ballona Wetlands, Santa Monica Mountains, El Segundo Dunes, coastal areas in Marina del Rey, the Inglewood Oil Field, or in the hillside/open space areas that support sensitive habitat.

The WSAP is a long-range policy document and does not include specific projects that would have adverse impacts on sensitive natural communities. Any future project that is facilitated by implementation of the WSAP would undertake a site-specific assessment of potential impacts to biological resources, and, as appropriate, mitigate potential significant impacts to riparian or sensitive natural communities. Future individual projects are required to demonstrate consistency with the goals and policies proposed in the WSAP. Further, the individual projects implementing the WSAP's goals, policies, strategies, and implementation actions also would be subject to policies in the General Plan as well as other local, State, and federal regulations regarding sensitive natural communities. Given the lack of natural sensitive communities in the focused land use/zoning changes areas (the 12 Opportunity Sites), as well as the requirement for all future projects to identify and mitigate potential impacts to such resources, impacts are considered less than significant.

**Impact 5.4-3: Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? [Threshold B-3]**

**Less Than Significant Impact.** Wetland habitats are generally found within or adjacent to water bodies and drainages. The Ballona Wetlands are protected wetlands under the California Coastal Commission and an officially designated SEA. No changes are proposed to the Ballona Wetlands under the WSAP as they are under a different planning process. Though unlikely given the highly developed condition of the sites that would be subject to land use/zoning changes as part of the WSAP, any future projects must evaluate the potential for jurisdictional features and comply with all WSAP, General Plan, and State/federal regulations pertaining to wetland features. The WSAP does not include specific projects that would have adverse impacts on state or federally protected wetlands and waters. Therefore, impacts would be less than significant.

**Impact 5.4-4: Would the Project convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10 percent 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.)? [Threshold B-4]**

**Less Than Significant Impact.** Oak woodlands and other unique native woodlands such as coast live oak riparian forest and California walnut woodland may be found in unincorporated areas of the County including, but not limited to, the foothills of the Santa Monica Mountains, KHSRA, and the Angeles National Forest. The potential for oak woodlands is limited to open space areas within Ladera Heights, View Park, and Windsor Hills, and primarily within the Baldwin Hills/Inglewood Oil Fields area, which is not subject to change as part of the proposed Project. Though unlikely given the highly developed condition of the sites that would be subject to land use/zoning changes as part of the WSAP, any future projects must evaluate the potential for impacts to biological resources including oak trees/oak woodlands, and comply with all WSAP, General Plan, and State/federal regulations pertaining to oaks. As such, there would be no impact to oak woodlands or other unique native woodlands.

**Impact 5.4-5: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites? [Threshold B-5]**

**Less Than Significant with Mitigation Incorporated.** Given the Study Area's location in a highly developed and urbanized part of the County, no habitat linkages or wildlife corridors are identified in the Study Area. However, any mature trees, and specifically in the Ladera Heights, View Park, Windsor Hills, and West Fox Hills communities that support a variety of habitats, can provide suitable nesting habitat for native migratory and resident bird species. Future development could result in impacts to nesting resident and migratory birds. Potential impacts could include disruption of nesting activity due to construction-related noise and potentially result in direct remove of active nests. Individual projects would be subject to the goals and policies outlined in the WSAP as well as the General Plan and other local, State and federal regulations. Future projects would be subject to the Migratory Bird Treaty Act which prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. Implementation of mitigation measure BIO-1 would minimize or avoid completely impacts to nesting avian species and active nests. Potential impacts would be less than significant with mitigation.

**Impact 5.4-6: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? [Thresholds B-6]**

**Less Than Significant Impact.** Though unlikely given the highly developed condition of the sites that would be subject to land use/zoning changes (the 12 Opportunity Sites) as part of the WSAP, any future projects must evaluate the potential for impacts to biological resources including oak trees, and comply with all WSAP, General Plan, and State/Federal regulations pertaining to oaks. This includes compliance with the Los Angeles County Oak Tree Ordinance, which prohibits the removal or damaging of oak trees in Los Angeles County as they are a historical and ecological resource. Therefore, impacts related to compliance with local policies including Los Angeles County Oak Tree Ordinance, would be less than significant.

**Impact 5.4-7: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan. [Threshold B-7]**

**Less Than Significant Impact.** A habitat conservation plan (HCP) is a federal planning document that guides the protection and enhancements of habitats on private land for endangered or threatened species. A non-federal entity (i.e., private companies, local or state governments, landowner) must develop a conservation plan, apply for an incidental take permit, and implement the project as specified in their permit. Ideally, an HCP will benefit wildlife conservation and community needs simultaneously. A Natural Community Conservation Plan is the State-operated counterpart of the HCP. No CDFW permitted Natural Community Conservation Plans or Habitat Conservation Plans occur within the Planning Area (CDFW 2023a). Therefore, impacts would be less than significant.

## 5.4.4 Cumulative Impacts

For the purposes of this analysis of cumulative impacts to biological resources, the geographic area of consideration (i.e., the cumulative impacts study area) is comprised of Los Angeles County, Angeles National Forest and Santa Monica Mountains to the north, and Santa Ana Mountains to the southeast.

**Impact 5.4-8: Would the Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? [Threshold B-1]**

**Less Than Significant Impact**. Future development may potentially result in the loss of common habitats and diminished resource availability. It is presumed that direct impacts to special-status species and their habitats would be mitigated, as feasible, in other regions of the cumulative impacts study area. Implementation of individual projects implementing the WSAP's goals, policies, strategies, and implementation actions would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding candidate, sensitive, or special status species. Buildout of the WSAP could result in direct or indirect impacts to various habitat types; however, given their location within the highly urbanized area in Los Angeles, the potential for impacts that cannot be reduced through project-level mitigation is unlikely. Therefore, cumulative impacts would be less than significant.

**Impact 5.4-9: Would the Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? [Threshold B-2]**

**Less Than Significant Impact.** Depending on the location of future WSAP projects, construction could result in significant impacts to riparian and other sensitive natural communities. Any future project that is facilitated by implementation of the WSAP would undertake a site-specific assessment of potential impacts to biological resources, and, as appropriate, mitigate potential significant impacts to riparian or sensitive natural communities. Given the lack of natural sensitive communities within the Planning Area and the focused land use/zoning changes, as well as the requirement for all future projects to identify and mitigate potential impacts to such resources, cumulative impacts are considered to be less than significant.

**Impact 5.4-10: Would the Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. [Threshold B-3]**

**Less Than Significant Impact.** Depending on the location of future projects, construction could result in impacts to state and/or federally protected wetlands or waters, particularly those located in proximity to water bodies. The Ballona Wetlands SEA is located within the Planning Area. No changes are proposed to the Ballona Wetlands under the WSAP as they are under a different planning process. Though unlikely given the highly

developed condition of the sites that would be subject to land use/zoning changes as part of the WSAP, any future projects must evaluate the potential for jurisdictional features and comply with all WSAP, General Plan, and State/Federal regulations pertaining to wetland features. Therefore, cumulative impacts would be less than significant.

**Impact 5.4-11: Would the Project, when combined with other past, present, or reasonably foreseeable projects, 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.)? [Threshold B-4]**

**Less Than Significant Impact.** There are no proposed changes to the zoning or land use intensities within oak woodlands or other unique native woodlands that would result habitat loss or conversion. Any future projects must evaluate the potential for impacts to biological resources including oak trees, and comply with all WSAP, General Plan, and State/Federal regulations pertaining to oaks. This includes compliance with the Los Angeles County Oak Tree Ordinance, which prohibits the removal or damaging of oak trees in Los Angeles County as they are a historical and ecological resource. As such, cumulative impacts to oak woodlands or other unique native woodlands is less than significant.

**Impact 5.4-12: Would the Project, when combined with other past, present, or reasonably foreseeable projects, 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? [Threshold B-5]**

**Less Than Significant Impact with Mitigation Incorporated.** While there are no proposed changes that increase intensities of the existing zoning or land use intensities within regional wildlife linkages or SEAs, future construction could result in impacts to nesting resident and migratory birds such as through disruption of nesting activity due to construction-related noise and direct removal of active nests associated with construction or vegetation removal/disturbance. Implementation of mitigation measure BIO-1 would avoid and/or minimize impacts to nesting avian species and active nest at the project level. Thus, the significant incremental contribution of future individual projects under the WSAP, when taken into consideration with the cumulative projects' impacts to wildlife movement and corridors over the span of the WSAP, is less than significant with mitigation.

**Impact 5.4-13: Would the Project, when combined with other past, present, or reasonably foreseeable projects, conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? [Thresholds B-6]**

**Less Than Significant Impact.** Future individual projects implementing the WSAP's goals, policies, strategies, and implementation actions would also be consistent with those identified in the General Plan, as well as other local, state, and federal regulations, for the protection of biological resources pertaining to oaks. Impacts would be less than significant at the WSAP level. Similarly, applicable County policies and ordinances pertaining to biological resources, including oak trees/oak woodlands, protection would be applied to projects within the

cumulative impacts study area. Therefore, cumulative impacts related to compliance with local policies including Los Angeles County Oak Tree Ordinance, would be less than significant.

**Impact 5.4-14: Would the Project, when combined with other past, present, or reasonably foreseeable projects, conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan. [Threshold B-7]**

**Less Than Significant Impact.** Future individual projects implementing the WSAP's goals, policies, strategies, and implementation actions would also be consistent with those identified in the General Plan, as well as other local, state, and federal regulations, for the protection of biological resources. Future development would not conflict with any HCPs or NCCPs. Therefore, cumulative impacts are considered to be less than significant.

## 5.4.5 Level of Significance Before Mitigation

Upon compliance with County ordinances, development standards, and WSAP goals and policies, impacts would be less than significant.

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.4-5:** Direct or indirect impacts resulting from future implementing projects may impact migratory native resident species or migratory wildlife corridors or impede the use of native wildlife nursery sites.

## 5.4.6 Mitigation Measures

### Impact 5.4-5

BIO-1 Construction, ground-disturbing activities, and vegetation removal for future projects resulting from the WSAP shall avoid activities during the general avian nesting season of February 15 through September 15. If construction of future projects that contain or are immediately adjacent to suitable nesting habitat must occur during the general avian nesting season, a pre-construction clearance survey shall be conducted within seven days prior to the start of construction activities to determine if any active nests or nesting activity is occurring on or within 500 feet of the project. If no sign of nesting activity is observed, construction may proceed without potential impacts to nesting birds. If an active nest is observed during the preconstruction clearance survey, an adequate buffer shall be established around the active nest depending on sensitivity of the species and proximity to project impact areas. Typical buffer distances include up to 300-feet for passerines and up to 500-feet for raptors, but can be modified as deemed appropriate by a monitoring biologist. On site construction monitoring may also be required, if recommended by a qualified biologist, to ensure that no direct or indirect impacts occur to the active nest. Project activities may encroach into the buffer only at the discretion of the monitoring biologist. The buffer shall remain in place until the nest is no longer active as determined by the monitoring biologist.

## 5.4.7 Level of Significance After Mitigation

Mitigation measure BIO-1 would require construction, ground-disturbing activities, and vegetation removal to occur outside the general avian nesting season of February 15 through September 15 as well as require pre-construction nesting bird surveys. If nesting birds are identified, mitigation measure BIO-1 requires additional requirements for construction activities to occur. Therefore, with implementation of mitigation measure BIO-1, the project would have less-than-significant impacts with mitigation related to nesting birds.

No significant unavoidable adverse impacts relating to biological resources have been identified.

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# 5. Environmental Analysis
## BIOLOGICAL RESOURCES

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# 5.5 CULTURAL RESOURCES

This section identifies and evaluates issues related to cultural resources to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact to cultural resources. Cultural resources comprise archaeological and historical resources. Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, cultural use or association, etc. In California, historic resources cover human activities over the past 12,000 years. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. The analysis in this section is based in part on the following information:

- *Historic Context Statement, Los Angeles County Westside Plan Area*, HRG, June 2024 (Appendix D)

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.5.1 Environmental Setting

### 5.5.1.1 REGULATORY BACKGROUND

#### Federal and State Regulations

##### *National Environmental Policy Act*

The National Environmental Policy Act (NEPA) establishes national policy for the protection and enhancement of the environment. Part of the function of the federal government in protecting the environment is to "preserve important historic, cultural, and natural aspects of our national heritage." Cultural resources need not be determined eligible for the National Register of Historic Places through the National Historic Preservation Act (NHPA) of 1966 (as amended) to receive consideration under NEPA. NEPA is implemented by regulations of the Council on Environmental Quality (40 Code of Federal Regulations [CFR] secs. 1500–1508).

The definition of effects in the NEPA regulations includes adverse and beneficial effects on historic and cultural resources (40 CFR 1508.8). Therefore, the environmental consequences section of an environmental impact statement (see 40 CFR 1502.16(f)) must analyze potential effects to historic or cultural resources that could result from the proposed action and each alternative. In considering whether an alternative may "significantly affect the quality of the human environment," a federal agency must consider, among other things:

- Unique characteristics of the geographic area, such as proximity to historic or cultural resources (40 CFR 1508.27(b)(3)), and

- The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register (40 CFR 1508.27(b)(8)).

Therefore, because historic properties are a subset of cultural resources, they are one aspect of the human environment defined by NEPA regulations.

### *National Historic Preservation Act of 1966*

The NHPA coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places (NRHP), which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

### *National Register of Historic Places*

The NRHP was established by the NHPA as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2) (CLS 2024). The NRHP recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. As noted above, a resource that is listed in or eligible for listing in the NRHP is considered "historic property" under Section 106 of the NHPA. To be eligible for listing, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

A. Are associated with events that have made a significant contribution to the broad patterns of our history.

B. Are associated 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.

D. Have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as the ability of a property to convey its significance. The NRHP recognizes seven qualities that, in various combinations, define integrity, including location, design, setting, materials, workmanship, feeling, and

association. To retain historic integrity, a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. Ordinarily, religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP unless they meet one of the Criteria Considerations (A through G) in addition to meeting at least one of the four significance criteria and possessing integrity.

### *Archaeological Resources Protection Act*

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands.

### *Native American Graves Protection and Repatriation Act*

Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Indian tribes.

### *California Public Resources Code*

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation (OHP), which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

## Local Laws, Regulations, and Policies

### *Los Angeles County Historic Preservation Ordinance*

The Los Angeles County (County) Historic Preservation Ordinance (ord. 2019-0004 Section 1) was enacted to enhance and preserve the county's distinctive historic, architectural, and landscape characteristics. Significance criteria and landmark and historic district designation procedures are enumerated as well. The Historic

Preservation Ordinance created a County Register of Landmarks and Historic Districts, to be maintained by a Landmarks Commission.

A landmark is defined as any property, including "[a]ny structure, site, place, object, tree, landscape, or natural feature, that is designated as a landmark by the Board pursuant to Chapter 22.124 (Historic Preservation)." (LACCO 2024) A historic district is defined as "[a] contiguous or noncontiguous geographic area containing one or more contributing properties which has been designated as an historic district by the Board pursuant to Chapter 22.124 (Historic Preservation)." (LACCO 2024)

The eligibility criteria for designation of Landmarks and Historic districts are (ord. 2019-0004 Section 1):

A. A structure, site, object, tree, landscape, or natural land feature may be designated as a landmark if it is 50 years of age or older and satisfies one or more of the following criteria:

    1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;

    2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community in which it is located;

    3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;

    4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;

    5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;

    6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or

    7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with a historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

B. Property less than 50 years of age may be designated as a landmark if it meets one or more of the criteria set forth in Subsection A, above, and exhibits exceptional importance.

C. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may be designated as a landmark or included in the landmark

designation of a property if the space qualifies for designation as a landmark under Subsection A or B, above.

D. Historic Districts. A geographic area, including a noncontiguous grouping of related properties, may be designated as a historic district if all of the following requirements are met:

1. More than 50 percent of owners in the proposed district consent to the designation;

2. The proposed district satisfies one or more of the criteria set forth in Subsections A.1 through A.5, above; and

3. The proposed district exhibits either a concentration of historic, scenic, or sites containing common character-defining features, which contribute to each other and are unified aesthetically by plan, physical development, or architectural quality; or significant geographical patterns, associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of parks or community planning.

Additionally, it is applicable to all privately owned property within unincorporated Los Angeles County, as well as all publicly owned landmarks, with the following exceptions:

1. Work involving a landmark or property within a historic district where a valid permit for the performance of such work was issued prior to the effective date of the nomination of the landmark or historic district, and the permit remains valid and in full force and effect at the time the work allowed by the permit is undertaken; or

2. Noncommercial property owned by any association or corporation that is religiously affiliated and not organized for profit, whether the corporation is organized as a religious corporation or as a public benefit corporation, provided that both of the following occur:

   a. The association or corporation objects to the application of the provisions of this part to its property; and

   b. The association or corporation determines during a public hearing held pursuant to this Chapter that it will suffer substantial hardship, which is likely to deprive the association or corporation of economic return on its property, the reasonable use of its property, or the appropriate use of its property in the furtherance of its religious mission, if the application of this Chapter to the property is approved.

### *Los Angeles County General Plan*

The County General Plan (General Plan) has the following goals and policies for the preservation of historic (built environment/historic architectural), cultural (archaeological), and paleontological resources.

**Goal C/NR 14:** Protected historic, cultural, and paleontological resources.

- **Policy C/NR 14.1.** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

- **Policy C/NR 14.2.** Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- **Policy C/NR 14.3.** Support the preservation and rehabilitation of historic buildings.
- **Policy C/NR 14.4.** Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).
- **Policy C/NR 14.5.** Promote public awareness of historic, cultural, and paleontological resources.
- **Policy C/NR 14.6.** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

### *Los Angeles Countywide Parks and Recreation Needs Assessments*

#### *2022 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment Plus*

On December 6, 2022, the Los Angeles County Board of Supervisors adopted the 2022 Parks Needs Assessment Plus (PNA+). The PNA+ is a national model for park equity and planning that assesses the County's needs with respect to environmental conservation and restoration, regional recreation, and rural recreation. The PNA+ builds on the Los Angeles Countywide Parks and Recreation Needs Assessment (PNA) of 2016, which comprehensively analyzes and quantifies the need for parks and recreational facilities in cities and unincorporated areas. It identifies priority areas for environmental conservation and restoration, forming the basis of the County's strategy to conserve at least 30 percent of lands and waters by 2030 (30x30). It also identifies priority areas for regional recreation and rural recreation using various indicators of population vulnerability and other factors such as access to regional and rural recreation sites via different modes of travel, the availability of such facilities, and the amenities they offer. Goals of the PNA+ specific to cultural resources include:

- Formalize partnerships with Native American tribes and groups to pursue opportunities for acknowledgement and stewardship of land. As part of various County planning processes, including those for the OurCounty Sustainability Plan and the PNA+, Native American residents and stakeholders identified numerous barriers to accessing County-owned land for cultural, religious, and traditional practices such as harvesting and gathering on ancestral lands. DPR and partner agencies should continue to collaborate with the Los Angeles City/County Native American Indian Commission (NAIC) and Native American tribes, indigenous-led organizations, and other indigenous stakeholders to remove barriers to the observance of cultural, religious, and traditional practices and explore partnerships for the co-management of lands.

## 5.5.1.2 EXISTING CONDITIONS

### General History

Information in this discussion is provided from the *Historic Context Statement* (see Appendix D), prepared as part of the WSAP development by Historic Resources Group (HRG). The Westside Planning Area (Planning Area)

is located in Los Angeles County, which spans more than four thousand square miles. Los Angeles County is the ancestral territory of the Tongva, Tataviam, Serrano, Kizh, and Chumash peoples. This context discusses the historical background of Native American groups in the Planning Area. There are no known extant built resources in the Planning Area dating from the pre-colonial period (before 1542).

## *Historical Background*

### *Native American Period (Before 1542)*

Tribes based in Los Angeles County have been identified by various names over the past two centuries. The Spanish settlers who colonized the area and developed the Mission San Gabriel Arcángel (San Gabriel Mission) assigned the name "Gabrieleño" to Native Americans associated with the Mission. Tongva, Kizh, and some members of the Cahuilla and Serrano tribes were historically encompassed under this nomenclature. Anthropologists Lowell John Bean and Charles R. Smith note that the term "Gabrieleño" first appeared in a report published by Oscar Loew in 1876 and has been "intermittently applied" to the Indigenous population of the Los Angeles area ever since. Today, some descendants refer to themselves as either Tongva or Kizh because they are terms of Native, rather than Spanish, origin.

For more than 7,000 years, the Planning Area's First Peoples have served as the traditional caretakers of the Los Angeles Basin; South Channel Islands; San Gabriel and Pomona Valleys; and portions of Orange, San Bernardino, and Riverside Counties. Historically, the present-day tribes listed above were not a single tribe, but a collection of lineages (a group of families with a common ancestor) that shared a common Uto-Aztecan language, culture, religion, and lifestyle that distinguished them from neighboring groups. This group did not have a single unifying name, and it was common for a tribe to refer to themselves in their own language simply as "people" or "men," although they likely would have assigned names to other tribes.

Prior to European contact and colonization, Native Americans in the present-day Planning Area thrived because of their relationship with the land and waters and their stewardship approach to land conservation. Archeological research indicates that habitation sites were hierarchically organized around estuaries, with settlement size dependent upon resource availability. While some larger estuaries could support large settlements, populations at smaller estuaries often practiced a strategy of mobility in which a part of the population foraged during resource scarcity. Research of flora and fauna remains from the Playa Vista/Ballona Creek area reveals evidence that local estuarine, coastal, and near-coast resources provided subsistence for people residing near the estuaries. Fishing was mostly limited to near-shore environments with little deep-sea fishing.

Villages were politically autonomous and largely organized through shared kinship ties. While it is difficult to estimate their population over time, evidence suggests that at the time of European contact in the 16th century there may have been more than fifty to one hundred mainland villages with a range in population sizes. Each village was headed by a chief, who was usually descended from the prevailing lineage of the village. The chief typically spoke multiple languages, negotiated social relations, collected taxes, and directed the community's seasonal migrations. In addition to the chief, spiritual leaders also had authority over the tribal community.

Surrounding Indigenous communities included the Chumash, the Tataviam, the Serrano, the Cahuilla, and the Luiseño. Interactions with surrounding groups were frequent and generally peaceful, occurring largely through the channels of intermarriage, matrilocal residence, and/or trade. It appears that the Planning Area's First Peoples also shared some rituals with the Chumash to the north, based on the distribution of similar stone effigies in the prehistoric period. With the possible exception of the Chumash, the Planning Area's First Peoples were the most populous and most powerful ethnic nationality in aboriginal Southern California, their influence spreading as far north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California. Their territory spanned several ecological zones. Consequently, the group's settlement and subsistence patterns varied slightly within each zone based on micro-environmental conditions, but on the whole, they thrived on hunting, gathering, and fishing activities.

The arrival of Spanish explorers in the 1760s ushered in a period during which Native Americans were subjugated to Spanish rule, targets of religious conversion to Catholicism, and enslaved to build and maintain the missions, pueblos, and presidios. Tribes were forced to move from their villages and subjected to violence and cultural genocide. Tribes were named after the missions they were forced into, which are reflected in the names of many local Tribes today.

### *Spanish and Mexican Period (1542–1848)*

The first European expedition landed on Catalina Island in 1542, home to the Tongva, and made the first recorded contact between the Spanish people and the Native people of modern-day Los Angeles County. The Spanish returned in 1769 to colonize the present-day Los Angeles area. Local tribes were forcibly displaced from their villages, eroding their language and culture. The Spanish enslaved the Native Americans, forcing them to build and maintain their missions, pueblos, and presidios, and they were subjected to a life of servitude and, in many cases, forced religious conversion.

Successive waves of settlers—the Spanish, the Mexicans, and the Americans—resulted in the loss of title(s) to their ancestral lands as well as disenfranchisement of the Native Americans. Spanish colonization of land was governed by the "Recopilación de Leyes de los Reynos de las Indias" of 1680, which provided that the inhabitants of colonized land included "the rights to their possessions, the right to as much land as they needed for their habitations, for tillage and for the pasturage of flocks." Under the law, the Spanish held land in trust for the Native Americans. While the Native Americans retained the land, water, and mineral rights living in and around the missions, these laws did not cover those living in traditional village settlements.

During the Spanish and Mexican colonial periods between 1542 and 1848, the important colonial settlements nearest to and most influential to the western portions of the present-day County were the Mission San Fernando Rey de Espana located in the present day community of Mission Hills in the San Fernando Valley, and the pueblo of Los Angeles (El Pueblo de Nuestra Senora la Reina del Los Angles), which was founded in 1781 and established the urban settlement that would become the present-day City of Los Angeles. There are no known extant built resources in the Planning Area dating from the Spanish and Mexican period. During the Spanish and Mexican eras, the westside of the County was occupied primarily by farms and agricultural lands focused on cattle, sheep, and some fruit tree cultivation. More information about this period can be found in the Historic Context Statement in Appendix D.

### *American Control and Settlement (1848–Present)*

The arrival of the railroad in 1875 and subsequent regional real estate and population boom opened up the Planning Area and surrounding lands for development and the first residential subdivisions. Despite the development of these early residential tracts throughout the first two decades of the 20th century, large areas of undeveloped land and agricultural fields remained including numerous farms established by Japanese American growers. More urbanized development did not take hold until the 1920s.

The development history of the Planning Area is tied to advances in transportation during the first quarter of the 20th century. In the 1900s, settlement had been facilitated by the establishment of the Pacific Electric streetcar. By the 1920s, the popularity of the automobile expanded development across the area. Development was also influenced by economic shifts during the first decades of the 20th century. Agricultural land gave way to industrial land uses, as production plants for the aircraft industry were established in the area. During the 1930s, Douglas and Hughes Aircraft relocated to areas bordering Mar Vista. In addition, with the discovery of oil in the Baldwin Hills in 1924, then Playa Del Rey and Venice in 1932, the petroleum industry became instrumental in the physical development of the area and oil-related uses such as derricks and oil-industry worker housing began to emerge as part of the landscape.

In the early 1940s, with a healthy employment base to attract new residents, housing subdivisions were constructed at an accelerated rate. This expansion continued throughout the 1940s, as new residential areas were added to accommodate defense industry workers who poured into the region during World War II and returning servicemen and other new residents after the war. After World War II, most of the area's remaining farms and open lands gave way to residential tracts. The late 1950s also saw construction of the San Diego Freeway, or Interstate 405, which increased automobile access to the area.

Significant post-World War II expansion of the aircraft manufacturing industry fueled economic growth and new development. Employers such as Douglas Aircraft in Mar Vista, as well as entertainment industry companies, such as MGM Studios in Culver City, attracted many new settlers to the area. Along with more residents came the need for an increase in services and amenities, resulting in significant commercial, civic, institutional, and infrastructural development in the mid-20th century. This is reflected in the area's numerous densely developed commercial corridors, as well as postwar expansion of a variety of building types.

### *Annexation History of the Planning Area*

On a macro level, the development history of the Planning Area consists of a series of incorporations and annexations over the past 100+ years. The largest city in the County, and the dominant municipality that surrounds and buffers the Planning Area's unincorporated communities, is the City of Los Angeles. The cities of Santa Monica, Culver City, Beverly Hills, and West Hollywood are virtually surrounded by land annexed into the City of Los Angeles over the last century. Geographic expansion of the City of Los Angeles through annexation resulted from a combination of government leaders looking for future growth and the concerns of residents regarding power, sewer access, water delivery, and public schools. Although some citizens purposefully located outside city limits to avoid municipal taxes, more often the need for infrastructure and supportive services made annexation attractive to the majority of property owners and residents.

# 5. Environmental Analysis
## CULTURAL RESOURCES

In 1906, the City of Los Angeles annexed the "Shoestring Strip" of 11,000 acres connecting the San Pedro Harbor with the city proper. Annexation of Wilmington and San Pedro soon followed. The physical connection of Los Angeles with its primary port accelerated additional annexations throughout the westside. Annexation of large portions of the Planning Area occurred during the first decades of the 20th century. The 31,000-acre Westgate Addition west of Beverly Hills and north of Santa Monica in 1915 surrounded the Soldier's Home to the east and west. The Palms area was added later that same year.

As with much of Southern California history, incorporation and annexation often revolved around the issue of water. William Mullholland's Los Angeles Aqueduct, bringing water from the Owens Valley, opened in November of 1913. The San Fernando Valley was annexed into the City of Los Angeles just two years later. Concerns over a potential water shortage, plus a desire to improve the local school system, drove the incorporation of Beverly Hills in 1914. In 1917, a major effort to annex some 6,000 to 7,000 acres of Planning Area land into the City of Los Angeles was undertaken. Referred to as the "West Coast Annexation," this effort was largely spearheaded by George H. Dunlop, the former mayor of Hollywood who had led Hollywood's consolidation efforts with the City of Los Angeles several years earlier.

One issue motivating annexation was the Hyperion sewer district, which the City of Los Angeles feared losing control over to the bordering municipalities of Venice and El Segundo. Opposition to the annexation came from the nearby municipalities of Santa Monica, Redondo Beach, El Segundo, Manhattan Beach, Hermosa Beach, and Inglewood, all of whom feared less control and oversight of the sewer nuisance at Hyperion, which was geographically closer to the beach cities than to Los Angeles.

The Citizens' League led by George F. Hays also lobbied against the West Coast Annexation. They represented the sentiments of several large landowners who had purposely purchased their acreage outside of city limits to avoid taxation of their holdings.

According to the regulations of the time, annexation was first voted on by the residents of the territory to be annexed. The Angeles Mesa area, home to the majority of the voting population, voted overwhelmingly in support of annexation. A follow-up election among residents of the City of Los Angeles overwhelmingly approved annexation. The move raised the footprint of the City of Los Angeles to 349.8 square miles, making it the largest city in America geographically. The Citizen's League, however, was successful in keeping their interests from annexation, resulting in the unincorporated areas of present-day Ladera Heights, View Park, and Windsor Hills. Ultimately, the City of El Segundo was incorporated in 1917 at the behest of the Standard Oil Company, being the site of its second largest oil refinery and an industry town.

A second major wave of annexations occurred during the 1920s. Sawtelle, an agricultural and support community for the nearby Soldier's Home (present-day Veterans Administration) was annexed into the City of Los Angeles in 1922. In 1918, Sawtelle residents voted by a narrow margin to be annexed into Los Angeles but were thwarted in their efforts when City trustees refused to participate. After a brief occupation of Sawtelle City Hall by Los Angeles officials, Sawtelle trustees sued in court and won on a technicality. Four years later, the residents of Sawtelle once again voted for annexation, and Sawtelle became the fourth city to be annexed into Los Angeles.

Venice was annexed into the City of Los Angeles in 1925, largely due to an inept government. Resistance to annexation in the seaside community was mounted by the hospitality industry, as they feared the City of Los Angeles' laws against gambling, all night dancing, and Sunday commercial activity would negatively impact businesses on and around the Venice pleasure piers. Other sections of the Westside Plan Area, including Laurel Canyon and Beverly Glen, were annexed into the City of Los Angeles as hillside residential development became more feasible and growth from nearby Hollywood continued.

Culver City began annexing neighboring land during the 1950s and 60s. During the 1950s, the Culver Crest residential area in the foothills near present-day West Los Angeles College was absorbed into the municipality in order to provide city services. In 1964, Culver City annexed a large section of the Fox Hills area (including the Fox Hills Country Club and Hillside Memorial Park). The owners of the property at the time, the Home Savings and Loan Co., suggested that the Culver City annexation would provide superior city services; however, rezoning issues appear to have factored into the decision as well because the land had been the subject of a rezoning fight while under County jurisdiction.

West Hollywood (formerly known as Sherman) remained unincorporated until 1984, at which time rent control measures were due to expire. This galvanized an incorporation effort by a coalition of LGBTQ activists, Russian immigrants, seniors, and renters. Once a municipal government was formed, rent control measures were immediately approved.

Lastly, the unincorporated areas currently in the Planning Area all have some historical ties to the oil industry, which may have been a factor in their decision to remain unincorporated. From the presence of the Inglewood Oil Field (Ladera Heights, View Park, and Windsor Hills), to the site of the Venice Oil Fields (Ballona Creek and Marina Del Rey), Gilmore Oil Field (Gilmore Island), and land previously owned by oil magnate Edward L. Doheny (Franklin Canyon), these areas mostly defy the patterns of early 20th century residential development that encouraged annexation or incorporation.

### *Community-Specific Development Histories*

The "study area" for the proposed Project includes the following communities in the Planning Area:

- **Ladera Heights, View Park, and Windsor Hills.** This area includes Ladera Heights, View Park, Windsor Hills, Baldwin Hills, and West Los Angeles College and extends as far south as to West Centinela Avenue, as far west as Freeman Drive, almost as far north as Glenford Street, and almost as far east to Crenshaw Boulevard. The Inglewood Oil Field and portions of Kenneth Hahn State Recreation Area are within this portion of this area. The proposed Project's Opportunity Sites[1] 1 through 11 are within this area. A description of these sites are provided in Chapter 4, *Environmental Setting*, of this Draft PEIR.

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

- **Marina del Rey.** Most of the Marina del Rey area consists of the marina of the same name. This area is bounded by Harbor Crossing Lane and Washington Boulevard to the north, Lincoln Boulevard to the east, Ballona Wetlands Ecological Reserve to the south, and Via Marina and Via Dolce to the west.

- **Ballona Wetlands.** This area consists of the portion of the Ballona Wetlands Ecological reserve that is north of Ballona Creek and bounded to the north and west by Fiji Way, and to the east by Lincoln Boulevard.

- **West Los Angeles (LA)/Sawtelle Veterans Administration (VA).** This area is bounded roughly by Ohio Avenue to the south, Federal Avenue to the west, Veteran Avenue to the east, and Chayote Street/ Homedale Street to the north. It is located to both the west and east of Interstate 405.

- **West Fox Hills.** This area is approximately bounded by Grosvenor Boulevard to the west, Centinela Avenue to the east, State Route 90 (Marina Freeway) to the north, and Jefferson Boulevard to the south. The proposed Project's Opportunity Site 12 is within this area. A description of this site is provided in Chapter 4, *Environmental Setting*, of this Draft PEIR.

- **Franklin Cayon.** This area consists of two areas situated within the Hollywood Hills. The larger portion is an irregularly shaped area in Franklin Canyon just north of Franklin Canyon Reservoir, accessible by both Franklin Canyon Drive and Lake Drive. The second, smaller portion of the Franklin Canyon area is located to the east of Franklin Canyon reservoir at the terminus of Ridgecrest Drive.

- **Gilmore Island.** This area is located south of West Hollywood and north of Downtown Los Angeles.

No land use changes to Marina del Rey, Ballona Wetlands, West LA/Sawtelle VA, Gilmore Island, or Franklin Canyon areas are proposed as part of the Project. Information regarding these areas is provided for context. A summary of the developmental history of each of these unincorporated communities is provided below.

*Ladera Heights, View Park, and Windsor Hills*

The Tongva and Kizh Peoples inhabited the greater Baldwin Hills area, including what is now known as Ladera Heights and View Park-Windsor Hills. After the secularization of the Spanish Missions in 1833, Spanish and Mexican land grants were given to former soldiers and individuals of stature, ushering in the Rancho period and the systematic forced displacement of Native Americans from the area. Ladera Heights and View Park-Windsor Hills were in the Rancho La Cienega o Paso de la Tijera. The Governor of Alta California, Manuel Micheltorena, granted the rancho to Vicente Sanchez for ranching in 1843.

In 1875 and 1886, Elias J. "Lucky" Baldwin purchased portions of the rancho, and the western portion of the land became known as Baldwin Hills. In 1909, after Baldwin's death, his heirs sold parts of the rancho for subdivision. A large expanse of land was sold to the Los Angeles Investment Company (LAIC)—the largest sale in the history of Los Angeles' suburban development at that time. The Los Angeles Investment Company was founded in 1898 and became one of the largest real estate and land development companies of its time. The LAIC subdivided many tracts in the former rancho, including breaking ground for the View Park tracts in

the early 1920s. Homes were built in the popular revival styles of the period. To further its real estate developments, the LAIC set aside 16 acres for Ladera Heights on the eastern side of its holdings.

Exploration for oil in the area dates to 1916, when the LAIC allowed several oil companies to conduct drill tests. In 1924, testing by the Standard Oil Company struck extensive oil deposits, precipitating establishment of the Inglewood Oil Field. During the 1920s, oil exploration peaked as demand soared along with increasing automobile ownership. The Great Depression of the 1930s decreased demand although the Inglewood Oil Field remained active. A large house constructed prior to oil exploration is still extant in the Inglewood Oil Field. Variously referred to as the "Baldwin Hills Oil House" and the "Cone Trust House," this remnant from earlier times is on a hill west of La Cienega Boulevard and Kenneth Hahn State Recreation Area. The two-story brick home, designed in a variant of Dutch Colonial Revival style, was built between 1913 and 1915 by a man named Charles Wellington Rand who died in 1917. In 1923, Rand's family sold the house to Emma and Irving Cone just one year before oil was discovered. Emma Cone became one of the first private property owners to sell oil leases in the Baldwin Hills area. The Cone family heirs still own the house and several acres of oil fields today.

During the late 1930s, Windsor Hills was developed by the Marlow-Burns & Company. Windsor Hills homes were largely designed in the Spanish Colonial Revival, Mediterranean Revival, and Minimal Traditional styles. More than 275 homes were built between 1937 and 1939. By 1942, 1,200 homes had been built.

After World War II, in response to the increased demand for housing, LAIC subdivided and developed Ladera Heights. LAIC built and sold many single-family residences but also sold to independent building contractors and owners who constructed custom homes. Homes in various styles, from Minimal Traditional to Ranch to Mid-century Modern dotted Ladera Heights. LAIC developed Ladera Heights in phases through the early 1960s.

Among the independent developers/contractors who built in Ladera Heights was Milton Kaufman (1882–1964), a Los Angeles developer dating back to the 1920s. After World War II, he formed Milton Kaufman Construction Corporation. Among his developments was a group of homes on Kings Road in Ladera Heights.

In 1963, the LAIC constructed a 15-acre commercial center at Centinela Avenue and La Cienega Boulevard—the Ladera Center, or Ladera Heights Shopping Center (designed by Stiles Clements)—with grocery and retail shops and a Security First National Bank. Also, 1963 was the year of the Baldwin Hills Dam collapse that resulted in five deaths and caused a devastating flood, damaging homes in the residential neighborhoods surrounding it.

The northern portion of the View Park-Windsor Hills area is dominated by the Kenneth Hahn State Recreation Area. The park contains the site of the former Baldwin Hills Reservoir, which was constructed between 1947 and 1951 by the Los Angeles Department of Water & Power. In 1984, the Kenneth Hahn State Recreation Area (KHSRA) was established. Named after the County Supervisor, it includes hiking trails, gardens, and recreational facilities. A grove of specimen trees, known as the Olympic Forest, was planted on the site in the park that housed athletes for the 1932 Olympics. In 2021, the County opened the Park to Playa Trail, a 13-mile regional trail that connects a network of trails, parks, and open spaces from the Baldwin Hills Parklands to the

Pacific Ocean. Artist Kim Abeles created seven sculptures that are placed along the trail, leading visitors between the Scenic Overlook in the west and the Stocker Corridor in KHSRA in the east.

Ladera Park, located in the community of View Park-Windsor Hills, opened in 1938. By 1932, federal funds provided through the Works Progress Administration (WPA) and Emergency Conservation Act program had made significant development of park, beach, and recreation areas possible during this time. The hand labor used to create the designed landscapes and buildings at Ladera Park conveys an association with the use of work relief programs established under the Roosevelt Administration during the Great Depression, specifically the WPA (Sapphos 2017).

Beginning in 1924, the LAIC developed the lower and flatter sections of View Park (south and east of Angeles Vista Boulevard) with more modest houses. Most of the homes were built in either the Spanish Colonial Revival or Tudor Revival styles popular at the time. View Park's hillside tracts were developed for more affluent buyers—taking advantage of panoramic views. These residences were designed and built in the popular Period Revival styles of the era, which, in addition to Spanish Colonial Revival and Tudor Revival, included Mediterranean Revival and French Revival. The hillside residences were larger and often included multicar garages, indicative of the income levels targeted by the developers. Between 1923 and 1927, the LAIC provided the architectural plans and construction services for the residences built in View Park; the names of these staff architects are currently unknown. The LAIC also constructed an 18-hole golf course adjacent to View Park and set aside a small, triangular plot of land for Monteith Park, a pocket greenspace at the intersection of Olympiad Drive, Mullen Place, and S. Mullen Avenue. View Park is listed as a historic district on the NRHP because of its architectural, cultural, and historical significance.

As was common practice at the time, the LAIC established restrictive covenants for these communities, prohibiting the sale of homes to people of color and those of the Jewish faith. As a result, the 1930 Census shows that the development contained just two Black residents and one resident of Japanese descent—all of whom were employed as domestic workers. Supreme Court decisions in 1948 and 1953 diminished the use of restrictive covenants. They were finally deemed illegal by the Fair Housing Act of 1968. For more information on racial tensions and integration in these communities, please see Appendix H, *Historic Context*.

*Marina del Rey*

Tongva and Kizh Peoples inhabited the greater Marina del Rey area. As previously discussed, research on remains of flora and fauna from the greater Playa Vista/Ballona Creek area show evidence that local estuarine, coastal, and near-coast resources provided subsistence for Native Americans residing near the estuaries. Present-day Marina del Rey was historically an extension of the Ballona wetlands. After the secularization of the Spanish Missions in 1833, Spanish and Mexican land grants were given to former soldiers and individuals of stature, ushering in the Rancho period and systematic forced displacement of Native Americans. Marina del Rey was in Rancho La Ballona.

In 1887, a developer named Moye L. Wicks (1855–1932), working under the auspices of the Santa Fe Railroad, envisioned a commercial harbor at the Playa del Rey estuary and inlets. By 1890, Wicks' Port Ballona Development Company was bankrupt and the constructed wharf was destroyed by a storm. Not long after,

Abbot Kinney (1850–1920) founded Venice by the Sea north of Marina del Rey in present-day Venice. Present-day Marina del Rey was also the site of the Venice Oil Fields in the 1920s and 1930s.

Development efforts at Marina del Rey were stalled by World War II, but after the war, efforts to create a harbor at Playa del Rey focused on small craft. Postwar affluence brought increased interest in leisure activities, including boating. In 1953, the County Board of Supervisors encouraged state legislation to help fund the development of Marina del Rey. In 1954, President Eisenhower signed Public Law 780 that made the Marina del Rey a federal project. The federal government would fund the development of the "main navigational features," splitting the costs with the County of Los Angeles. The first plan for Marina del Rey was designed by Victor Gruen Associates in 1960.

The first residential development in Marina del Rey was the 30-acre Del Rey Shores Apartments, which was constructed in 1965. In 1968, the Bar Harbor area and its Bar Harbor Apartments were developed—an eight-structure "country club on the ocean." No changes to Marina del Rey are proposed as part of the WSAP.

*Ballona Wetlands*

The presence of Native Americans along Ballona Creek and in the Ballona Wetlands has been confirmed by numerous archeological finds. Evidence suggests that Native people occupied sites both on the neighboring bluff to the south and in the lowlands. The area has also been subject to much speculation about the existence and location of two Native American villages, Sa'angna and Guaspita.

Sixteen years after the founding of the Pueblo of Los Angeles in 1781, Jose Manuel Machado, a soldier guard from Santa Barbara, moved his family to the pueblo. The Talamantes family followed shortly thereafter, and together, the two families raised horses and cattle. Seeking new grazing land for their herds, they found land in the Ballona far removed from the mission's claims. Permission to occupy the area was given to the two families (the Machados and the Talamantes) in 1819. Grazing and residential activity was located north of the Ballona Wetlands Community area.

To encourage settlement, the Spanish and later Mexican governments (Mexico won independence in 1821) made land concessions or grants between 1784 and 1846. Rancho Ballona became a legal entity under Mexican law in 1839 when ownership was formally granted to Agustin and Ygnacio Machado and Felipe and Tomas Talamantes. By 1858, the Hancock survey of Rancho Ballona shows that the majority of the Ballona Wetlands area (north of Ballona Creek) was owned by members of the Talamantes family.

The land boom of the 1880s resulted in old ranchos being bought up and subdivided by White owners; however, the Ballona Wetlands area was largely unaffected by these developments. The area remained marshland with small bodies of standing water and was chiefly known for its good duck hunting. During the 1910s, there was boat racing and sightseeing by tourists who used the Pacific electric interurban railway to Playa del Rey beach. The 1910 census documents more than 60 Japanese-born (issei) farmers working the land along Ballona Creek near Venice. These farmers typically built small, vernacular structures (informal, hand-built shelters, often with found materials) on the land on which they worked.

In 2003, the State of California acquired a portion of the Ballona Wetlands south of the Planning Area as the Ballona Wetlands Ecological Reserve. No land use changes to Ballona Wetlands are proposed as part of the WSAP.

*West LA/Sawtelle VA*

As early as 400 AD, a communal spring, Kuruvungna, just west of the community near the intersection of present-day Santa Monica Boulevard and Barrington Avenue, was associated with Tongva Peoples and later associated with the Kuruvungna village. It is now known as the Kuruvungna Village Springs, which is designated California Registered Landmark Site No. 522. In 1975, human remains were discovered on site during a school construction project. During the 1980s, archeologists noted that remnants of the village were located throughout the area. In 2013 and 2014, ancestral remains and artifacts were again unearthed and ceremoniously reinterred on the north hill of Kuruvungna.

During the Rancho period, the West LA/Sawtelle VA community, spanned two ranchos—the Rancho San Vicente y Santa Monica on the west and the Rancho San Jose de Buenos Ayres on the east. In December of 1887, the Pacific Branch of the National Home for Disabled Veteran Soldiers was established on 600 acres of donated land (now the West LA/Sawtelle VA). The acreage was donated by John Percival Jones and Arcadia Bandini de Baker, owners of the Rancho San Vicente y Santa Monica, and John Wolfskill, owner of the Rancho San Jose de Buenos Ayres. The first barracks was completed in December 1888, and they filled quickly with veterans living in tents around the property. By 1889, a cemetery had been created for the burial of veterans at the Pacific Branch. Soon, the community of Sawtelle, directly south of the Soldier's Home (West LA/Sawtelle VA community), sprang into existence.

Railroads and streetcars played an important role in the development of the area generally and the West LA/Sawtelle VA community specifically. In 1896, an interurban rail line that followed present-day Santa Monica Boulevard was established south of the Soldier's Home. The Pacific Electric "Balloon Route" was an interurban line that linked Los Angeles with a number of tourist sites (including Santa Monica, Venice, and the beaches) on a balloon-shaped track.

The site was in almost continuous development for the first 20 years. Initial buildings were utilitarian in style. Over time, the Soldier's Home adopted the Queen Anne Style commonly used by branches east of the Mississippi. In 1892, Congress appropriated funds for the construction of two barracks, a new hospital wing, a kitchen, residences for administrators, a guardhouse, barn and corral, two gates, and two gatehouses. By 1908, there were 11 wood-frame barracks.

Following World War I, the National Homes for Disabled Volunteer Soldiers began designing new facilities as primary care facilities. In 1930, the National Homes for Disabled Volunteer Soldiers merged with the Bureau of Pensions, creating the Veterans Administration.

After World War II, medical research became an expanding part of activities at the West LA/Sawtelle VA community VA Hospital. In 1955, medical research became a formal aspect of its mission with an appropriation from Congress to fund it. That same year, the hospital began construction of a new wing for Wadsworth Hospital—one of the first Modern-style buildings on the campus. Further modernization projects commenced

in 1958, and by 1968 four additional research facilities were constructed. By the late 1960s, a trend of consolidation in health care services was underway, and the campus began leasing land to other government agencies. Around this time, the expansion of Interstate 405, the San Diego Freeway, encroached on a southeast corner of the campus. The West Los Angeles Veterans Affairs Historic District, Los Angeles National Cemetery, and the Wilshire Federal Building are listed as a historic district on the National Register of Historic Places because of its architectural, cultural, and historical significance. No changes to West LA/Sawtelle VA are proposed as part of the WSAP.

*West Fox Hills*

The area that became the West Fox Hills Community (also known as the Alsace County Island or unincorporated Del Rey) is in the Los Angeles Basin, which is the ancestral home of Tongva and Kizh Peoples. In 1931, evidence of a Native American burial ground was unearthed at Jefferson Boulevard and Centinela Boulevard. During the Rancho period and the systematic forced displacement of Native Americans, the West Fox Hills Community was in the Rancho La Ballona, with significant landholdings by the Machado family. On February 23, 1890, Louis Mesmer (1829–1900), a pioneer Los Angeles patriarch, inherited a large section of Rancho La Ballona from Andres Bristwalter, who was a Mesmer business partner and friend of the Machados. Mesmer later purchased additional land of the Rancho La Ballona.

The West Fox Hills Community was a stop on the Venice-Inglewood Line of the Los Angeles interurban electric railway system. It remained undeveloped until August of 1927, when it was subdivided as Tract 10038 by the Grosvenor-Inglis Corporation as part of its development of what was called Mesmer City.

Mesmer City was a large residential development stretching roughly from Culver City's movie studios in the northeast to the Ballona Wetlands in the west, to the Pacific Electric Railway line along Del Rey Boulevard in the north to the proposed site of Los Angeles Lutheran University (a.k.a. Loyola Marymount) in the southeast. It was also adjacent to the Fox Hills Country Club.

Oil was discovered on land near Alsace in 1929. In 1930, Grosvenor-Inglis purchased the remainder of Joseph Mesmer's land, some 250 acres, that was being leased to the Shell Oil Company. In 1960, the acquisition of land at the northern tip of the West Fox Hills community facilitated construction of the Centinela Creek Flood Control Channel and the Marina Freeway.

Historical aerial photographs of the area show that the land along Jefferson Boulevard remained largely undeveloped until 1980. Along Jefferson Boulevard and the southern part of Centinela Boulevard light industrial and commercial buildings were constructed.

*Franklin Canyon*

Franklin Canyon was originally occupied by the Tongva People. After 1833, during the Rancho period, Franklin Canyon was part of the Rancho Rodeo de Las Aguas. The Rancho period began the systematic forced displacement of Native Americans from the area.

In 1912, oil tycoon Edward L. Doheny purchased 400 acres of land in Franklin Canyon. Doheny sold large portions of the land to the City of Los Angeles for William Mullholland's water project. In 1914, construction

began on a reservoir in upper Franklin Canyon to distribute the water brought from the Owens Valley by Mullholland and the newly created Los Angeles Department of Water & Power.

Doheny reserved portions of the property as a ranch for his cattle and built one of several ranch homes that the oilman and his wife enjoyed. The family built a Spanish Colonial Revival-style home in lower Franklin Canyon in 1935, also outside of the study area. However, the study area of Franklin Canyon is traversed by a number of fire roads and includes the Franklin Canyon Trailhead parking area. The area is largely covered in chaparral and natural vegetation.

In 1954, a large portion of Franklin Canyon Ranch was subdivided. The portion remaining in the Doheny family was retained by the family until 1977 when it was purchased by developers. The upper reservoirs were deemed unsafe after the 1971 Sylmar earthquake.

When the canyon was subject to development, the U.S. National Park Service purchased the Franklin Canyon Ranch. The Franklin Canyon Sooky Goldman Nature Center was constructed in the northern part of the park, outside the study area. However, the William O. Douglas Outdoor Classroom, erected c. 1981, is within the study area. According to the Franklin Canyon Community Profile published by Los Angeles County, there are no residential parcels contained in this Planning Area. According to this document, there is a population of one person, assumedly an on-site Franklin Canyon Park employee. Today, the area is owned by the National Park Service and operated by the Mountains Recreation and Conservation Authority. No land use changes to Franklin Canyon are proposed as part of the WSAP.

*Gilmore Island*

Tongva and Kizh Peoples inhabited the greater area including Gilmore Island. Gilmore Island, which consists of one parcel (APN 5512002001), is 1.3 miles from the La Brea Tar Pits. Tar from the pits was used by Native Americans as a glue or caulk and as waterproofing for baskets and/or canoes. Over time, the Native Americans were systematically dislocated from these ancestral lands. The Gilmore Island Community was in the Rancho San Rafael that was given to California's first Portuguese settler, Antonio Jose Rocha. In 1877, When Rocha's heirs tried to sell part of the Rancho, they could not produce sufficient documentation to prove ownership. The land was then purchased by James Thompson, with some purchased by the Hancock Brothers. In 1880, Thompson declared bankruptcy and his land was put up for auction.

Arthur Freemont Gilmore (1850-1964) and Julius Carter purchased 256 acres of the rancho at auction in 1880. Initially used as a dairy farm, Gilmore struck oil on the property in 1890 and subsequently established the Gilmore Oil Company. Gilmore and his son, E. B. Gilmore, ran the company and it became one of the most important independent oil companies in Southern California.

Parts of the Gilmore property were developed over time into the Farmers Market (1934), Gilmore Stadium (1934, demolished) and CBS Television City (1952, designed by Pereira & Luckman, Gin Wong) and annexed into the City of Los Angeles. Gilmore Island remains the last unincorporated parcel of land relating to the Gilmore family legacy. No changes to Gilmore Island are proposed as part of the WSAP.

### *Significant Themes and Associated Property Types in the Planning Area*

Development of the unincorporated areas in the Planning Area exemplify broader patterns of development in the City of Los Angeles, Los Angeles County, and Southern California. The following six themes have been identified:

- 20th Century Residential Development (streetcar suburbs, auto-oriented suburban development, post-war residential development, and housing discrimination)
- 20th Century Commercial Development (commercial corridors, post-war neighborhood shopping center, themed retail shopping villages, and professional office buildings)
- 20th Century Civic and Institutional Development (schools, libraries, religious institutions, and African American institutions)
- 20th Century Industrial Development (agriculture, oil and petroleum, and aviation and aerospace)
- Arts and Culture
- Infrastructure and Transportation (interurban railway systems, freeway system, and taming the rivers)

### *Architecture and Design (1890–1980)*

The Planning Area is home to a variety of residential, commercial, and institutional buildings representing architectural styles and building types popular during each period of development. Prominent architectural styles include but are not limited to Tudor Revival, English Revival, Spanish Colonial Revival, Streamline Moderne, and Mid-Century Modern. Buildings with little or no distinguishing decorative features may be described as "vernacular" in style. The term "Residential Vernacular," for example, is used to describe simple houses or cottages. These buildings are characterized by their simplicity and lack characteristics of recognizable styles.

Buildings that are significant for the embodiment of the distinguishing features of an architectural style and/or as a significant work of a master architect or designer will be evaluated under this context. For each significant architectural style there is a discussion of the origins and a list of character-defining features intrinsic to each. A property that is eligible for designation as a rare, or good/excellent example of its architectural style retains most—though not necessarily all—of the character-defining features of the style and continues to exhibit its historic appearance. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style. A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.

## 5.5.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated the with lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history. (PRC § 5024.1; 14 CCR § 4852)

The fact that a resource is not listed in the California Register of Historical Resources, not determined to be eligible for listing, or not included in a local register of historical resources does not preclude a lead agency from determining that it may be a historical resource.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

C-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

C-3 Disturb any human remains, including those interred outside of dedicated cemeteries.

## 5.5.3 Environmental Impacts

### 5.5.3.1 METHODOLOGY

Impacts to historical resources, unique archaeological resources, and human remains that may result from the proposed Project are evaluated at a programmatic level based on a cultural resources records search through the California Historical Resources Information System of the South Central Coastal Information Center at California State University, Fullerton; the Built Environment Resource Directory (BERD) (OHP 2020); the National Register Information System (NPS 2023); California Historical Landmarks (OHP 2022); California Department of Transportation Local Bridge Survey (Caltrans 2020); Caltrans State Bridge Survey (Caltrans 2018); historical aerial maps of the Plan Areas dating from 1944 to 2020; and historical USGS topographic quadrangle maps from 1894 to 1966. The results of these searches is provided below by specific location.

## Ladera Heights, View Park, and Windsor Hills

As shown in Table 5.5-1, *Previous Cultural Studies in the Ladera Heights, View Park, and Windsor Area*, 28 previous cultural resource investigations have been conducted in this part of the Planning Area. These studies revealed the presence of pre-contact sites, including lithic scatters and habitation sites, and historical refuse scatters. The previous studies were conducted between 1975 and 2017. The records searches indicate that approximately 70 percent of this part of the Planning Area has been previously surveyed for cultural resources.

**Table 5.5-1 Previous Cultural Studies in the Ladera Heights, View Park, and Windsor Hills Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 98 | Clewlow, William C. Jr. | Evaluation of the Archaeological Resources and Potential Impact of the Development of Baldwin Hills County Regional Park | 1975 |
| 309 | Wlodarski, Robert J. | Archaeological Reconnaissance Report for Areas Relating to the North Outfall Replacement Sewer Project, Los Angeles County, California. | 1987 |
| 1508 | Kelly, Kenneth G. | Cultural Resource Investigation: Tract No. 21887, Baldwin Hills | 1986 |
| 2158 | Greenwood, Roberta S. | Initial Study: Tentative Tract No. 49778, County of Los Angeles | 1990 |
| 2312 | Romani, Gwendolyn R. | Archaeological Investigation: Tentative Tract No. 50616, Baldwin Hills, Los Angeles County, California | 1991 |
| 2369 | Romani, Gwendolyn R. | Archaeological Investigation: Tentative Tract Map No. 50594, Baldwin Hills, Los Angeles County, California | 1991 |
| 3556 | King, Thomas F. | UCAS-319 Highway Extension of Stocker Drive: La Cienega to Overland Avenue, Baldwin Hills, Los Angeles County | 1969 |
| 3673 | Anonymous | Historic Property Survey Report North Outfall Relief Sewer (nors) | 1987 |
| 3948 | McLean, Deborah K. | Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility La 926-01, 4470 La Cienega Boulevard, City and County of Los Angeles, California | 1998 |
| 4186 | McLean, Deborah K. | Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility LA 832-03, 5259 1/2 Angeles Vista Boulevard, City and County of Los Angeles, California | 1998 |
| 4555 | Duke, Curt | Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 721-01, in the County of Los Angeles, California | 1999 |
| 4561 | Duke, Curt | Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 862-01, in the County of Los Angeles, California | 1999 |
| 4749 | Duke, Curt | Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 862-03, in the County of Los Angeles, California | 1999 |
| 5101 | Lapin, Philippe | Cultural Resource Assessment for Modifications to Pacific Bell Wireless Facility La926-01, County of Los Angeles, Ca | 2000 |
| 5104 | Wells, Helen Fairman | Phase I Cultural Resources Investigation of Kenneth Hahn State Recreation Area Proposed Development, Los Angeles County, California | 2000 |
| 6237 | Robinson, R. W. | Historic Property Survey Report Addendum Regarding Westchester Center Freeway Facilities | 1984 |
| 6238 | Broughton, Gregory J. | Historic Property Survey Report Regarding Westchester Center Freeway Facilities Los Angeles County | 1984 |
| 6497 | McKenna, Jeanette A. and David Brunzell | A Phase I Cultural Resources Investigation for the Proposed Expansion of the W. Los Angeles College Campus in the City of Culver City, Los Angeles County, California | 2002 |
| 6512 | Lapin, Philippe | Cultural Resource Assessment for Pacific Bell Wireless Facility LA 581-03, County of Los Angeles, California | 2000 |

**Table 5.5-1 Previous Cultural Studies in the Ladera Heights, View Park, and Windsor Hills Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 7710 | Carrico, Richard L. | Results of Records Search and Field Examination for Bechtel Corporation Facility 9500004129b (Ethiopian Church), Ladera Heights, California | 2004 |
| 8955 | King, Phil V. | Final Report for Year Three Historical and Cultural Resources Survey of Los Angeles: Sylmar, Watts, Crenshaw, and Vermont/Slauson | 1983 |
| 9469 | Schmidt, June A. | Movie-Stanhill-Windsor Hills/La Cienega- Stanhill-Windsor Hills 66kV Deteriorated Pole Replacement Project, Los Angeles County | 2008 |
| 9551 | Bonner, Wayne H. | Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA13073C (Don Tomaso JPA), 4559 Don Tomaso Drive, Los Angeles, Los Angeles County, California | 2008 |
| 9992 | Anonymous | Notice of Availability, Baldwin Hills Community Standards District Draft Environmental Impact Report | 2008 |
| 10224 | Bonner, Wayne H. and Kathleen A. Crawford | Cultural Resources Records Search and Site Visit Results for Clearwire Candidate CA- LOS2146/CA7859, 5300 Angeles Vista Blvd., Los Angeles, Los Angeles County, California | 2009 |
| 11973 | Unknown | Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Final Environmental Impact Statement | 2011 |
| 12184 | Bonner, Wayne H. and Kathleen A. Crawford | Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02926A (LA2926 La Cienega Pass JPA) 4407 South La Cienega Boulevard, Los Angeles, California | 2013 |
| 12191 | Bonner, Wayne H. and Kathleen A. Crawford | Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA03327E (Slauson and Deane T JPA) 5751 Deane Avenue, Los Angeles, California | 2013 |
| -- | Sapphos Environmental, Inc. | Historical Resource Evaluation for Ladera Park | 2017 |

The records search also determined that four previously recorded pre-contact and historic-era cultural resources are in this portion of the Planning Area, as shown in Table 5.5-2, *Previously Recorded Cultural Resources in the Ladera Heights, View Park, and Windsor Hills Area*. Of these, one is believed to be associated with Native American occupation, and three are historic-era sites associated with refuse disposal. Refer to Appendix E for the archaeological sensitivity for the area.

**Table 5.5-2 Previously Recorded Cultural Resources in the Ladera Heights, View Park, and Windsor Hills Area**

| Site Number CA LAN- | Primary Number P-19 | Recorder and Year | Age/Period | Site Description | Within Planning Area? |
|---|---|---|---|---|---|
| 1399 | 1399 | 1988 (ANYA STEWART, Play Mountain Place) | Pre-contact | Lithic scatter, habitation debris | Yes |
| 3754H | 3754 | 2007 (Ken Victorino, Dustin McKenzie, SAIC) | Historic | Domestic trash scatter | Yes |
| 3755H | 3755 | 2007 (Ken Victorino, Dustin McKenzie, SAIC) | Historic | Trash scatter | Yes |
| 4179H | 4179 | 2011 (Amy Glover, Cogstone Resource Management) | Historic | Trash scatter | Yes |

The OHP's BERD for Los Angeles County listed a total of 342 historic built environment resources within the Planning Area (OHP 2020). Of these resources, 335 of them are associated with the View Park Historic District. View Park Historic District is roughly bounded by Mt. Vernon Drive, Enoro Drive, Northland Drive, Northridge Drive, Kenway Avenue, South Victoria Avenue, and Floresta Avenue. The View Park Historic District construction ranges from the 1920s to 1960s; it originally started as a racially exclusive suburb and transitioned to an upwardly mobile African American suburb (NPS 2023). The remaining seven listed resources are not in the historic district and were determined ineligible for listing on the NRHP. The National Register Information System lists View Park Historic District (Reference Number 16000434) in the Planning Area (NPS 2022).

The Caltrans Bridge Local and State Inventories list one historic-period bridge in the Planning Area (Caltrans 2018, 2020). Local Bridge 53C0548, La Cienega Boulevard Under Crossing, is at the intersection of South La Cienega Boulevard and West Slauson Avenue. It was constructed in 1949 and was evaluated by Caltrans as a Category 5 bridge, not eligible for the NRHP under Criterion C.

Based on review of historical aerial photographs, the property appeared to have been used for agricultural or industrial uses at the higher elevations in the 1930s and 1940s, but by the 1960s the majority of the Ladera Heights-View Park-Windsor Hills area was laid out in a city grid and developed.

## Marina del Rey

As shown on Table 5.5-3, *Previous Cultural Studies in the Marina del Rey Area,* 32 previous cultural resource investigations have covered all of this part of the Planning Area. These studies revealed the presence of pre-contact sites, including lithic scatters and habitation sites, and historical sites, including foundations, walls, and refuse scatters. The previous studies were conducted between 1969 and 2015. The results of the records search indicate that the entire portion of the Planning Area has been previously surveyed for cultural resources.

**Table 5.5-3 Previous Cultural Studies in the Marina del Rey Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 27 | Rozaire, Charles E. | Del Rey/strand Environmental Impact Report | 1974 |
| 69 | Rosen, Martin D. | Evaluation of the Archaeological Resources in Playa Del Rey Area, Leighton and Associates | 1974 |
| 253 | Dillon, Brian D. | Report on Preliminary Archaeological Investigations at CA-LAN-47, the Admiralty Site, Marina Del Rey, California. | 1988 |
| 436 | Pence, Robert L. | Archaeological Assessment of the Summa Corporation Property, Culver City, Los Angeles County | 1979 |
| 624 | Rosen, Martin D. | Archaeological Assessment of Lot 10, Block 18, Silver Strand Area, Marina Del Rey, Los Angeles City Corner of Via Dulce and Topsail | 1979 |

**Table 5.5-3 Previous Cultural Studies in the Marina del Rey Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 1975 | Neuenschwander, Neal J. | Cultural Resource Survey and Clearance Report for the Proposed American Telephone and Telegraph Los Angeles Airport Central Office to the Santa Monica Central Office Fiberoptic Communication Route | 1989 |
| 2372 | Homburg, Jeffrey A. | Late Prehistoric Change in the Ballona Wetland. | 1991 |
| 2558 | Altschul, Jeffery | Gateway Project | 1990 |
| 2669 | Gervais, Richard | Draft Background and Environmental Impact Report Venice District | 1978 |
| 2673 | Altschul, Jeffery H., Jeffery A. Homburg, and Richard S. Ciolek-Torrello | Life in Ballona: Archaeological Investigations at the Admiralty Site (CA-LAN 47) and the Channel Gateway Site (CA-LAN-1596\h) | 1992 |
| 3495 | Levine, Harvey S. | A Review of Indian Burial Findings at Marina Del Rey | 1969 |
| 4052 | King, Chester | Archaeological Reconnaissance for the Marina Del Rey Pipeline, Venice, Los Angeles County, California | 1998 |
| 4865 | Duke, Curt | Cultural Resource Assessment Cingular Wireless Facility No. SM 018-01, Los Angeles County, California | 2001 |
| 4868 | Shepard, Richard S., Roger D. Mason, and E. Bruce Lander | Cultural Resources Records Search and Paleontologic Resources Literature Review Report for the Sempra Energy Gas Leas Sale Planning Area, Playa Del Rey and a Portion of the City of Los Angeles, Los Angeles County, California | 2000 |
| 5757 | Iverson, Gary | Negative Archaeological Survey Report - Widening and Signal Upgrades on the West Side of the Intersection at Lincoln Boulevard and Mindanao Way, Remove the Raised Islands on Lincoln Blvd. Between Fiji Way and Mindanao Way, Re-stripe Lincoln Blvd. | 1998 |
| 6239 | Wesson, Alex, Bryon Bass, and Brian Hatoff | El Segundo Power Redevelopment Project Cultural Resources (archaeological Resources) Appendix J of Application for Certification | 2000 |
| 6240 | Bunse, Meta and Mikesell, Stephen D. | El Segundo Power Redevelopment Project Historic Resources (built Environment) Appendix K of Application for Certification | 2000 |
| 6244 | Duke, Curt | Cultural Resource Assessment at & T Wireless Services Facility No. D092.2 Los Angeles County, California | 2002 |
| 6570 | Swanson, Mark T. | Playa Vista Archaeological and Historical Project, Technical Report 1. Visual and Aesthetic Impact of the Playa Vista Project on Adjacent Properties 45 Years of Age and Older. | 1991 |
| 7185 | Foster, John M. | Archaeological Investigation for Venice Pumping Plant Dual Force Main Project | 2004 |
| 7720 | McKenna, Jeanette A. | Results of a Phase I Cultural Resources Investigation of the Marina Del Rey "Parcel OT", Approximately 2.11 Acres in Marina Del Rey, Los Angeles County, California | 2006 |

**Table 5.5-3 Previous Cultural Studies in the Marina del Rey Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 7721 | McKenna, Jeanette A. | Results of a Phase I Cultural Resources Investigation of the Marina Parcel 21 Planning Area, Approximately 2.55 Acres in Marina Del Rey, Los Angeles County, California | 2006 |
| 7724 | Keller, Angela H. | Playa Vista Archaeological and Historical Project, Technical Report 9. Evaluation of Sr10, a Nonarchaeological Assemblage in the Ballona Wetlands, Marina Del Rey, California | 1999 |
| 7725 | Altschul, Jeffrey H. | Playa Vista: Archaeological Treatment Plan for CA-LAN-54 | 2001 |
| 7939 | Kane, Diane | Historic Property Survey Report for the Route 1 Widening Project Between Culver Boulevard and Jefferson Boulevard in Los Angeles County, California | 2000 |
| 9481 | Altschul, Jeffrey H., Richard S. Ciolek-Torrello, Jeffrey A. Homburg, and Mark T. Swanson | Playa Vista Archaeological and Historical Project Research Design. Statistical Research Technical Series No. 29, Pt. 1. | 1991 |
| 10152 | Anonymous | Playa Vista Archaeological and Historical Project (PVAHP). Programmatic Agreement, Playa Vista Project, Annual Reports, September 1996 through 2007. | 2007 |
| 10880 | Trinh, Phoung | Tahiti Marina application for Department of the Army authorization | 2007 |
| 11819 | Hirsch, Jennifer | Historical Resources Evaluation Report for the SR 90 Realignment and Admiralty Way Improvements Projects Marina Del Rey, California | 2006 |
| 12757 | Delu, Antonina and Carrie Chasteen | Cultural Resource Study for The Boat Yard—Marina Del Rey, Marina del Rey, Los Angeles County, California | 2014 |
| 12989 | Anonymous | Survey LA, Los Angeles Historic Resources Survey: Historic Resources Survey Report Venice Community Plan Area | 2015 |
| 13135 | Bonner, Wayne H. | Cultural Resources Survey, Villa Venetia Apartments, 13900 Fiji Way, Marina Del Rey, City And County Of Los Angeles, California | 2000 |

As shown on Table 5.5-4, *Previously Recorded Cultural Resources in the Marina del Rey Area*, the records search also determined that two previously recorded pre-contact and historic-era cultural resources are in this part of the Planning Area. One of these is believed to be associated with Native American occupation of the vicinity, and one is a historic-era site associated with the Venice Dump. Refer to Appendix E for the archaeological sensitivity for the area.

**Table 5.5-4 Previously Recorded Cultural Resources in the Marina del Rey Area**

| Site Number CA-LAN- | Primary Number P-19- | Recorder and Year | Age/Period | Site Description |
|---|---|---|---|---|
| 47 | 47 | 1961 (K. Johnson) | Pre-contact | shell midden, habitation debris, burials |
| 4299H | 4299 | 2011 (N. Harris, Chambers Group) | Historic | refuse scatter and foundations |

The OHP's BERD for Los Angeles County did not include any resources in the Planning Area (OHP 2020). The National Register Information System did not reveal any eligible or listed properties in the Planning Area (NPS 2022). The Caltrans Bridge Local and State Inventories did not list any historic bridges in the Planning Area (Caltrans 2018, 2020).

Based on review of historical aerial photographs, the Marina del Rey area has been used for defense, oil extraction, and duck hunting through the 1950s. By the 1960s the harbor was developed at Marina del Rey.

## Ballona Wetlands

As shown in Table 5.5-5, *Previous Cultural Studies in the Ballona Wetlands Area*, 13 previous cultural resource investigations have been conducted in this part of the Planning Area. These studies revealed pre-contact sites, including lithic scatters and habitation sites, and historical sites, including foundations and refuse scatters. The previous studies were conducted between 1979 and 2016. The results of the records search indicate that the entire portion of the Planning Area has been previously surveyed for cultural resources.

**Table 5.5-5 Previous Cultural Studies in the Ballona Wetlands Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 436 | Pence, Robert L. | Archaeological Assessment of the Summa Corporation Property, Culver City, Los Angeles County | 1979 |
| 1975 | Neuenschwander, Neal J. | Cultural Resource Survey and Clearance Report for the Proposed American Telephone and Telegraph Los Angeles Airport Central Office to the Santa Monica Central Office Fiberoptic Communication Route | 1989 |
| 6570 | Swanson, Mark T. | Playa Vista Archaeological and Historical Project, Technical Report 1. Visual and Aesthetic Impact of the Playa Vista Project on Adjacent Properties 45 Years of Age and Older. | 1991 |
| 7185 | Foster, John M. | Archaeological Investigation for Venice Pumping Plant Dual Force Main Project | 2004 |
| 7724 | Keller, Angela H. | Playa Vista Archaeological and Historical Project, Technical Report 9. Evaluation of Sr10, a Nonarchaeological Assemblage in the Ballona Wetlands, Marina Del Rey, California | 1999 |
| 7725 | Altschul, Jeffrey H. | Playa Vista: Archaeological Treatment Plan for CA-LAN-54 | 2001 |
| 7939 | Kane, Diane | Historic Property Survey Report for the Route 1 Widening Project Between Culver Boulevard and Jefferson Boulevard in Los Angeles County, California | 2000 |
| 9481 | Altschul, Jeffrey H., Richard S. Ciolek-Torrello, Jeffrey A. Homburg, and Mark T. Swanson | Playa Vista Archaeological and Historical Project Research Design. Statistical Research Technical Series No. 29, Pt. 1. | 1991 |

**Table 5.5-5 Previous Cultural Studies in the Ballona Wetlands Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 10152 | Anonymous | Playa Vista Archaeological and Historical Project (PVAHP). Programmatic Agreement, Playa Vista Project, Annual Reports, September 1996 through 2007. | 2007 |
| 10880 | Trinh, Phoung | Tahiti Marina application for Department of the Army authorization | 2007 |
| 12500 | Vader, Michael | Final Archaeological Resources Monitoring Report for the Los Angeles Department of Water and Power Scattergood-Olympic Transmission Line Project, Vault Investigations, Los Angeles County, California | 2013 |
| 13135 | Bonner, Wayne H. | Cultural Resources Survey, Villa Venetia Apartments, 13900 Fiji Way, Marina Del Rey, City And County of Los Angeles, California | 2000 |
| 13363 | Vader, Michael and Michael R. Bever | Ballona Wetlands Ecological Reserve Restoration Project, Los Angeles, California Extended Phase I and Phase II Archaeological Testing Report | 2016 |

As shown on Table 5.5-6, *Previously Recorded Cultural Resources in the Ballona Wetlands Planning Area*, the records search found one previously recorded pre-contact cultural resource in this part of the Planning Area. Resource P-19-1698 is believed to be associated with Native American occupation of the vicinity. Refer to Appendix E for the archaeological sensitivity for the area.

**Table 5.5-6 Previously Recorded Cultural Resources within the Ballona Wetlands Planning Area**

| Site Number CA-LAN- | Primary Number P-19- | Recorder and Year | Age/Period | Site Description |
|---|---|---|---|---|
| 1698 | 1698 | 1989 (Neal Neuenschwander, Peak & Associates) | Pre-contact | Shell Midden |

The OHP's BERD for Los Angeles County did not include any resources within the Planning Area (OHP 2020). The National Register Information System failed to reveal any eligible or listed properties within the Planning Area (NPS 2022). The Caltrans Bridge Local and State Inventories lists one historic-period bridge in the Planning Area—State Bridge 53-0089, Culver Boulevard Over Crossing, which crosses Lincoln Boulevard. It was constructed in 1933 and was evaluated by Caltrans as a Category 5 bridge, not eligible for the NRHP under Criterion C (Caltrans 2018, 2020).

Based on review of historical aerial photographs, the Ballona Wetlands has not been developed outside of the use in oil production and remains preserved as a wetland.

## West LA/Sawtelle VA

As shown in Table 5.5-7, *Previous Cultural Studies in the West LA/Sawtelle VA Area*, 27 previous cultural resource investigations have been conducted in this part of the Planning Area. These studies revealed two historic-period resources consisting of refuse deposits. The previous studies were conducted between 1980 and 2012. The results of the records search indicate that approximately half of this part of the Planning Area has been previously surveyed for cultural resources.

**Table 5.5-7 Previous Cultural Studies in the West LA/Sawtelle VA Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 859 | Dillon, Brian D. | An Archaeological Resource Survey and Impact Assessment of a Parcel East of Barrington Ave., Veteran's Administration Hospital, Los Angeles County | 1980 |
| 1968 | Bissell, Ronald M. | Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los, Angeles, Los Angeles County, California | 1989 |
| 3289 | Davis, Gene | Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation | 1990 |
| 3599 | Maki, Mary K. | Negative Phase I Archaeological Survey of1.2 Acre at 1401 Sepulveda Boulevard, Westwood, Los Angeles County, California | 1997 |
| 4239 | Unknown | Historical Property Survey Report West Los Angeles Veloway Project | 1989 |
| 5016 | Iverson, Gary | Negative Archaeological Survey Report: 19590k | 1999 |
| 6491 | Sriro, Adam | Highway Project to Add High Occupancy Vehicle (HOV) Lane to Northbound Route 405 From 0.5 Km South of 1-10 to Ventura Boulevard in Los Angeles County | 2001 |
| 6495 | Bryant, Jack K. | Environmental Assessment Veterans Administration Medical Center Los Angeles, California | 1995 |
| 6500 | Bryant, Jack K. | Habitat Mitigation and Monitoring Plan Veterans Administration Medical Center Los Angeles, California | 1995 |
| 6520 | Billat, Lorna | Nextel Communications Proposed Wireless Telecommunications Service Facilities- Southern California | 2001 |
| 8088 | Warren, Keith | Cultural and Paleontological Resources Assessments Department of Veterans Affairs West Los Angeles Healthcare Center Project West Los Angeles, California | 2005 |
| 8710 | Chasteen, Carrie and Catherine Wood | Historic Property Survey Report: 7-la-sepulveda Boulevard, Between Wilshire Boulevard and Mulholland Drive (6 Miles) | 2007 |
| 8898 | Baker, Cindy and Mary L. Maniery | Cultural Resource Inventory and Evaluation of United States Army Reserve 63d Regional Readiness Command Facilities | 2007 |
| 10838 | Chasteen, Carrie | Sepulveda Boulevard Reversible/Bike lane and Intersection Improvement Project Between Wilshire Boulevard and Mulholland Drive (6 miles), City of Los Angeles, California | 2007 |
| 10839 | Kahle, Richard | Work Plan for Asbestos and Lead Paint Abatement VA B20 Chapel, Veteran's Administration Facility, West Los Angeles, CA | 2007 |
| 10841 | Chasteen, Carrie, Mark Robinson, and Noelle Shaver | Historic Property Survey Report, 11000 Wilshire Blvd., Los Angeles, CA | 2006 |
| 11005 | Unknown, Mr./Mrs. | Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report | 2010 |
| 11114 | Foster, John M. | Archaeological Investigation, Partial Inventory Secondary Sewer Renewal Program Bundy and San Vicente Project | 2011 |
| 11265 | Switalski, Hubert and Jason Cooper | Archaeological and Historical Properties Survey Report of Approximately 13 Acres for the Proposed Department of Veterans Affairs Columbarium Expansion Project, Los Angeles National Cemetery, Los Angeles, Los Angeles County, California | 2010 |
| 11320 | Schamel, Kathleen | Conservation/Repair of Soldiers (NHDVS) Monument, Los Angeles National Cemetery, Los Angeles, Los Angeles County, CA | 2009 |

**Table 5.5-7 Previous Cultural Studies in the West LA/Sawtelle VA Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 11321 | Schamel, Kathleen | Conservation/Repair of the Civil War Soldier Monument, Los Angeles National Cemetery, Los Angeles County, CA. | 2009 |
| 11327 | Loftus, Shannon | Cultural Resource Records Search and Site Survey AT&T Site LA0180 Veteran's Affairs 11301 Wilshire Boulevard, Los Angeles, Los Angeles County, California 90073 Casper #3551017338 | 2011 |
| 11642 | Daly, Pam and Sikes, Nancy | Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports | 2012 |
| 11718 | Baker, Cindy | Finding of No Adverse Effect for Los Angeles Medical Center Historic District, Buildings 278 and 298, Los Angeles, Los Angeles County, California | 2011 |
| 11785 | Rogers, Leslie | Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension | 2012 |
| 11795 | Bardsley, Andrea and Hubert Switalski | Supplemental Archaeological and Historical Properties Survey for the Proposed Department of Veterans Affairs Columbarium Expansion Project, Los Angeles National Cemetery, Los Angeles, Los Angeles County, California | 2012 |
| 12354 | Trotoux, Jennifer | VA West LA Solar PV Project (ARG #12005), Rooftop Mounted Solar Array Details | 2012 |

As shown on Table 5.5-8, *Previously Recorded Cultural Resources in the West LA/Sawtelle VA Planning Area,* the records search found two previously recorded historic-era cultural resources in this portion of the Planning Area. Both are believed to be historic-era sites associated with early—twentieth-century refuse deposits. Refer to Appendix E for the archaeological sensitivity for the area.

**Table 5.5-8 Previously Recorded Cultural Resources in the West LA/Sawtelle VA Planning Area**

| Site Number CA-LAN- | Primary Number P-19- | Recorder and Year | Age/Period | Site Description |
|---|---|---|---|---|
| 4864H | 4864 | Ziogas and Duke 2014 | Historic | Refuse scatter |
| 4865H | 4865 | Ziogas and Duke 2014 | Historic | Refuse scatter |

The OHP's BERD for Los Angeles County listed 112 historic built environment resources in the Planning Area (OHP 2020). Of these resources, 89 are associated with the West Los Angeles Veterans Affairs Historic District (Reference Number 14000926) (NPS 2023); 16 are associated with the Los Angeles National Cemetery, also included in the West Los Angeles Veteran Affairs Historic District (DVA 2023); 3 are associated with the Wilshire Federal Building and parking structure at 1100 Wilshire Boulevard; and the remaining 4 are not associated with any of the above-listed historic places.

The Caltrans Bridge Local and State Inventories lists five historic-period bridges in the Planning Area, shown in Table 5.5-9. None of these bridges are considered eligible for NRHP listing (Caltrans 2018, 2020).

**Table 5.5-9 California Local and State Bridges within the West LA/Sawtelle VA Planning Area**

| Local/State ID | Bridge Names | Year Construction | Caltrans Eligibility Category Code |
|---|---|---|---|
| 53C0168 | Bonsall Avenue | 1957 | Category 5 bridge, not eligible for the NRHP under Criterion C. |
| 53-0710 | Wilshire Boulevard Under Crossing | 1957 | Category 5 bridge, not eligible for the NRHP under Criterion C. |
| 53-0711 | Constitution Avenue Under Crossing | 1957 | Category 5 bridge, not eligible for the NRHP under Criterion C. |
| 53-1100S | Sepulveda Boulevard Under Crossing | 1957 | Category 5 bridge, not eligible for the NRHP under Criterion C. |
| 53-1101S | Sepulveda Boulevard Under Crossing | 1957 | Category 5 bridge, not eligible for the NRHP under Criterion C. |

Based on review of historical aerial photographs, the West LA/Sawtelle VA area has been continuously utilized by the Veterans Administration or that agency's predecessor since at least 1894.

## West Fox Hills

As shown in Table 5.5-10, *Previous Cultural Studies in the West Fox Hills Area*, three previous cultural resource investigations have been conducted within this portion of the Planning Area. These studies did not reveal any cultural resources. The previous studies were conducted between 1981 and 2009.

**Table 5.5-10 Previous Cultural Studies in the West Fox Hills Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 1619 | McAuley, Tamara K. | An Archaeological Resource Survey and Impact Assessment of the Jefferson Boulevard Site | 1986 |
| 3898 | Anonymous | Proposal for Archaeological Investigations in the Area of Hammock Street and Port Drive (vii-l.a.-90,405; Lincoln Blvd. to Slauson Avenue) | 1981 |
| 9921 | Scott Billatt | New Tower ("NT") Submission Packet for SCE Juniette Centinela, #LA0363D FCC Form 620 | 2009 |

Less than 1 percent of the West Fox Hills study area has been previously surveyed for cultural resources. No cultural resources have been recorded. Refer to Appendix E for the archaeological sensitivity for the area.

The OHP's BERD for Los Angeles County listed one historic built resource in the Planning Area, a single-family residence at 12474 Beatrice Street, and it has been evaluated as ineligible for NR listing (OHP 2020).

The Caltrans Bridge Local and State Inventories lists one historic-period bridge in the Planning Area. Local Bridge 53C0778, Centinela Creek, is 100 feet south of State Route 90. It was constructed in 1962 and was evaluated by Caltrans as a Category 5 bridge, not eligible for the NRHP under Criterion C (Caltrans 2018, 2020).

Based on review of historical aerial photographs, the West Fox Hills area was undeveloped until the 1950s. By 1953, residential development is observed in most of the area, and by the late 1980s the southern portion of the area was developed.

## Franklin Canyon

As shown in Table 5.5-11, *Previous Cultural Studies in the Franklin Canyon Area*, four previous cultural resource investigations have been conducted in this part of the Planning Area. These studies did not reveal any cultural resources. The previous studies were conducted between 1979 and 1999. The results of the records search indicate that all of this portion of the Planning Area has been previously surveyed for cultural resources.

**Table 5.5-11 Previous Cultural Studies in the Franklin Canyon Area**

| Report Number LA- | Author(s) | Report Title | Year |
|---|---|---|---|
| 859 | Dillon, Brian D. | An Archaeological Resource Survey and Impact Assessment of a Parcel East of Barrington Ave., Veteran's Administration Hospital, Los Angeles County | 1980 |
| 1968 | Bissell, Ronald M. | Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los, Angeles, Los Angeles County, California | 1989 |
| 3289 | Davis, Gene | Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation | 1990 |
| 3599 | Maki, Mary K. | Negative Phase I Archaeological Survey of1.2 Acre at 1401 Sepulveda Boulevard, Westwood, Los Angeles County, California | 1997 |

The records search also determined that no pre-contact and historic-era cultural resources are in this portion of the Planning Area. Refer to Appendix E for the archaeological sensitivity for the area.

The OHP's BERD for Los Angeles County includes five historic built resources within the Planning Area, shown in Table 5.5-12 (OHP 2020). The National Register Information System failed to reveal any eligible or listed properties in the Planning Area (NPS 2022).

**Table 5.5-12 California OHP Built Environment Resources Directory Listings in the unincorporated Franklin Canyon**

| OTIS | Resource Name/Address | Description | OHP Eligibility Status Code |
|---|---|---|---|
| 499489 | 2115 Hillcrest Drive | Unknown | 6Y-Determined non eligible for NR by consensus through Section 106 process |
| 493509 | 2630 Hillcrest Drive | Unknown | 6Y-Determined non eligible for NR by consensus through Section 106 process |
| 573796 | 2203 Hillcrest Drive | Unknown | 6Y-Determined non eligible for NR by consensus through Section 106 process |
| 493508 | 2616 Hillcrest Drive | Unknown | 6Y-Determined non eligible for NR by consensus through Section 106 process |
| 484899 | 3005 Hillcrest Drive | Unknown | 6Y-Determined non eligible for NR by consensus through Section 106 process |

The Caltrans Bridge Local and State Inventories did not list any historic bridges in the Planning Area (Caltrans 2018, 2020).

Based on review of historical aerial photographs, the property within Franklin Canyon area has remained an open space area with trails and access to the Franklin Canyon Reservoir.

### Gilmore Island

No previous cultural resource investigations have been conducted in this part of the Planning Area, and no cultural resources have been recorded here. Refer to Appendix E for the archaeological sensitivity for the area.

The OHP's BERD for Los Angeles County did not include any resources within the Planning Area (OHP 2020). The National Register Information System failed to reveal any eligible or listed properties within the Planning Area (NPS 2022).

The Caltrans Bridge Local and State Inventories did not list any historic bridges in the Planning Area (Caltrans 2018, 2020).

Based on review of historical aerial photographs, the property has been used at least since 1894—as ranch lands, a parking lot, the location of a CBS building, and now a parking lot, and it is in the Fairfax District of Los Angeles.

## 5.5.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

### Land Use Element

**Goal LU 3:** A community of distinct and livable space

- **Policy LU 3.9.** Encourage the integration of neighborhood-specific cultural, historical, and architectural elements in new development and renovations whenever possible.
- **Policy LU 3.10.** Promote the inclusion of public art in commercial and mixed-use projects that reflect the area's historic and cultural heritage.

**Implementation Program LUI 1.** In consultation with stakeholders and residents, design and implement a *Placemaking Plan* that may include:

- Additions or improvements of infrastructure such as: entry signage and monuments, street trees, benches, shade structures, recycling and trash bins on sidewalks, crosswalks, wayfinding signage, and public art installations.
- Integration of pocket parks and open spaces on public properties and in streetscapes.

- Implementation of public art programs to enhance community identity, which may include placement of murals on blank commercial building facades. This may be coordinated with public agencies, schools, community groups and organizations, and local artists.

### Economic Development

**Goal ED 4:** Established businesses and the community's Black legacy are preserved

- **Policy ED 4.3.** Preserve and enhance existing historic and cultural resources to promote entrepreneurship and attract new economic opportunities.

**Implementation Program EDI 6.** Create a program to allow for cultural or artistic uses to temporarily occupy vacant and/or inactive commercial spaces. Allow for entrepreneurs to create "pop-up" retail initiatives, test new concepts, or operate incubator spaces to increase activation on the Slauson Corridor or along West 54th Street. Identify properties and negotiate with landlords/property owners to secure affordable rents for these temporary uses.

### Historic Preservation

**Goal H 1:** Identification, Documentation, and Designation of Historic Resources

- **Policy H 1.1.** Establish a comprehensive inventory of historic sites, buildings, and structures beginning with existing documentation. Update inventory regularly as additional information is gathered.

- **Policy H 1.2.** Seek grant funding (Certified Local Government funding and other sources) to conduct further study – including intensive historic resources surveys -- of areas within the Westside Planning Area.

- **Policy H 1.3.** Promote existing County efforts to educate property owners about the County's historic preservation program, including criteria for historic significance, the process for nominating and designating historic resources, and incentives for property owners to maintain and restore historic properties through tax credits, grants, or other financial assistance.

**Goal H 2:** Protection of Historic Resources from Demolition and Inappropriate Alteration

- **Policy H 2.1.** Encourage the adaptive reuse of commercial and civic buildings important to the history and cultural development of the Westside Planning Area through the adoption of an Adaptive Reuse Ordinance.

- **Policy H 2.2.** Develop education materials on the historic architectural styles prevalent within the individual unincorporated communities of the Westside Planning Area, including the important characteristics, features, and materials that define each style. Post this information on the WSAP Historic Resources web page.

- **Policy H 2.3.** Provide guidance and technical assistance for the appropriate maintenance and repair of historic buildings so that their historic character is maintained. Issues addressed should include material

treatments, appropriate replacement roof materials and wall cladding, window and door repair and replacement, and compatible additions or alterations. Guidance should include the standards and guidelines for the rehabilitation and treatment of historic resources developed by the National Park Service and the California Office of Historic Preservation.

**Goal H 3:** Protection of the Historic Character of Neighborhoods and Districts

- **Policy HP 3.1.** Develop guidelines for street and sidewalk improvements, street lighting, retaining walls and other infrastructure projects to ensure that new construction within and adjacent to historic neighborhoods and districts is compatible in design, scale, and materials.

**Goal H 4:** Increased Public Awareness of the Westside Area's Unique History

- **Policy H 4.1.** Organize community workshops and events to raise awareness about the history of the Westside Planning Area.
- **Policy H 4.2**. Prepare outreach materials to inform residents, business owners, and community organizations to identify important and/or neglected historic narratives and related historic assets.
- **Policy H 4.3**. Foster cultural identity and community awareness by creating interpretive programs and multimedia resources highlighting the stories and people important to the cultural identity of the Westside Planning Area. Incorporate physical markers such as plaques or signage for buildings, sites, and districts important to community history.
- **Policy H 4.4.** Collaborate with schools, churches, and community organizations to promote the understanding of local history.
- **Policy H 4.5.** Collaborate with local history groups, preservation advocacy organizations, and homeowner associations to implement tours of historic areas.

**Implementation Program HRI 1**. Initiate historic context studies of Black institutions and social history in Ladera Heights and View Park-Windsor Hills. Identify potential historic resources associated with African Americans that could potentially be preserved and celebrated, and raise awareness of African American history and contributions, in coordination with HRI 4.

**Implementation Program HRI 2.** Initiate historic context studies of mid-century Modern architecture, with a focus on Ladera Heights.

**Implementation Program HRI 3.** Initiate a historic context study of the development history of Marina del Rey.

**Implementation Program HRI 4.** Initiate historic resources survey of Ladera Heights and Windsor Hills to identify potential historic districts, and/or individual properties eligible for historic listing. Potential historic significance may include but is not limited to: architecture, urban planning, events and trends, Black history, and community identity.

**Implementation Program HRI 5.** Initiate historic resources survey of Marina del Rey to identify potential individual properties eligible for historic listing. Potential historic significance may include but is not limited to architecture, urban planning, events and trends, and community identity.

**Implementation Program HRI 6.** Utilize historic resource surveys as guides detailing the historic architectural styles prevalent within Ladera Heights and View Park-Windsor Hills community and the important characteristics, features, and materials that define each style

**Implementation Program HRI 7.** Create educational materials on the appropriate maintenance and repair of historic buildings with a focus on common repair and maintenance issues including material treatments, appropriate replacement roof materials and wall cladding, window and door repair and replacement, and compatible additions or alterations.

### 5.5.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.5-1: Development of the project could impact an identified historic resource. [Threshold C-1]**

**Less Than Significant Impact with Mitigation Incorporated.** Based on the records search and background research, four historic districts/properties meet the criteria for historical resources under CEQA—View Park Historic District in Ladera Heights, View Park, and Windsor Hills and the West Los Angeles Veteran Affairs Historic District, the Los Angeles National Cemetery, and the Wilshire Federal Building, all within the West LA/Sawtelle VA area. None of the proposed Project's Opportunity Sites are within the West LA/Sawtelle VA area.

A review of early historical aerial photographs and topographic maps shows most of the unincorporated communities and islands have had some kind of residential or industrial development from the early 1900s to the 1970s. As discussed in Chapter 4, *Environmental Setting*, of this Draft PEIR, the proposed Project's Opportunity Sites are developed to varying degrees with existing structures.

The WSAP is a policy document that does not include proposals for or approvals of any specific projects; therefore, the proposed Project would not result in direct physical impacts to historical resources. However, future projects facilitating land use/zoning changes and policies in the WSAP have the potential to involve structural improvements, demolition/alteration of existing structures, and/or ground-disturbing activities (for construction of residential and mixed-use development) that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources. Future projects would be required to comply with existing federal, State, and local regulations that protect historical resources and undergo the County's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects nonetheless have the potential to result in significant impacts to previously recorded and undiscovered historical resources qualifying as historical resources under CEQA.

WSAP goals and policies would assist in ensuring that historical resources are maintained to the extent possible, such as Policy LU 3.9, which encourages integration of neighborhood-specific cultural, historical, and architectural elements and visual interest in new development and renovations, whenever possible; Goal H1 and its related policies that encourage the identification, documentation, and designation of historical resources; and Policy ED 4.3, which would preserve and enhance existing historic and cultural resources promote entrepreneurship and attract new economic opportunities. However, any future projects that propose the demolition, destruction, relocation, or alteration of a building or structure more than 45 years in age or that involves ground-disturbing activities have the potential to result in significant impacts to historic architectural resources qualifying as historical resources under CEQA. Mitigation measure CUL-1 would require future project proponents to retain a qualified architectural historian to conduct a historic resources assessment of affected properties to determine whether the subject property is considered a historical resource pursuant to CEQA, and, if so, to adequately assess whether the resource would be impacted by a project, requiring mitigation measures and alternatives as appropriate. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to historic resources assessments and Secretary of the Interior's Standards plan reviews). Compliance with this mitigation measure would ensure impacts to historic resources would be less than significant.

**Impact 5.5-2: Development of the project could impact archaeological resources. [Threshold C-2]**

**Less Than Significant Impact with Mitigation Incorporated.** Based on the records search and background research and as shown on Figures 5.5-1 through 5.5-4 in Appendix E, the Ladera Heights, View Park, and Windsor Hills Area, Marina del Rey Area, Ballona Wetlands Area, and West LA/Sawtelle VA Area have areas that have archaeological resource sensitivity.

Future projects facilitating land use/zoning changes and policies included in the WSAP could involve ground-disturbing activities (for construction of residential and mixed-use development) that could, depending on their location, result in direct or indirect adverse changes to the significance of archaeological resources. Future projects would be required to comply with existing federal, State, and local regulations that protect unique archaeological resources and undergo the County's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects nonetheless could result in significant impacts to unique archaeological resources under CEQA.

Any project that involves ground-disturbing activities, and particularly those in higher sensitivity areas or sites that have not been previously disturbed, could result in a significant impact on a unique archaeological resource. However, implementation of mitigation measures CUL-2, which would require future project proponents to retain an archaeologist to conduct an archaeological resources assessment, through CUL-6, which requires project proponents to curate all significant historic period archaeological material, or portions thereof at the discretion of the Qualified Archaeologist, at a repository accredited by the American Association of Museums, would reduce potential impacts to less than significant levels.

**Impact 5.5-3: Grading activities could potentially disturb human remains. [Threshold C-3]**

**Less Than Significant Impact with Mitigation Incorporated.** Human remains associated with the prehistoric and historic periods that are interred outside of a dedicated cemetery are known to occur in the general area of the county. Future projects facilitating land use/zoning changes and policies included in the WSAP have the potential to involve ground-disturbing activities (for construction of residential and mixed-use development) that have the potential to, depending on their location, disturb human remains. Future projects would be required to comply with existing federal, State, and local regulations that protect human remains and undergo the County's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects have the potential to result in significant impacts to human remains under CEQA, including to human remains interred outside of dedicated cemeteries. The implementation of mitigation measure CUL-7, which requires the project proponent or its contractor to immediately halt work within 50 feet of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, would reduce impacts to less than significant levels.

## 5.5.4 Cumulative Impacts

For the purposes of this analysis of cumulative impacts to cultural resources, the geographic area of consideration (i.e., the cumulative impacts study area) consists of the Westside Planning Area and adjacent cities. This geographic scope of analysis is appropriate for the analysis of cultural resources because the historical resources, unique archaeological resources, and human remains within this area are similar in nature and origin and share a common heritage. Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable probable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself). Cumulative impacts could result at various locations within this area from the initiation of on-the-ground work in furtherance of a project facilitated by the WSAP and until ground-disturbing activities cease.

**Impact 5.5-4: Would the project, when combined with other past, present, or reasonably foreseeable projects, cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?**

**Less Than Significant Impact with Mitigation Incorporated.** The County has a rich prehistoric and historic archaeological record as well as numerous historic-period buildings and structures. Past, present, and reasonably foreseeable future projects, have affected and can be expected to continue to affect the significance of archaeological and historic architectural resources qualifying as historical resources, which may include the resources identified in Tables 5.5-2, 5.5-4, 5.5-6, and 5.5-8, by adversely altering and/or demolishing such resources. Because all historical resources are unique and nonrenewable members of finite classes, projects that demolish or alter them could cause or contribute to a significant cumulative impact on historical resources.

The proposed Project, because of projects facilitated by WSAP, has the potential to contribute a significant incremental contribution to this significant cumulative impact; however, this impact could be mitigated to a

level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of mitigation measure CUL-1. With the implementation of these measures, the Project-specific, incremental contribution, taken into consideration with the cumulative projects' impacts to historical resources over the span of the WSAP, would not be cumulatively considerable because they would require, prior to implementation of projects that might impact known and unknown historical resources, an architectural historian to identify historical resources, provide recommendations, require archaeological monitoring, and prepare a plan for the treatment of historical resources. With the implementation of mitigation measure CUL-1, a less than significant cumulative impact to historical resources would result.

**Impact 5.5-5: Would the project, when combined with other past, present, or reasonably foreseeable projects, cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Less Than Significant Impact with Mitigation Incorporated.** The county has a rich prehistoric and historic archaeological record. Past, present, and reasonably foreseeable future projects, have affected and can be expected to continue to affect the significance of unique archaeological resources in the unincorporated islands and communities of the Planning Area, including disturbance to unanticipated discoveries of such resources during ground-disturbing activities. Because such resources are, by definition, one of a kind, projects that adversely affect unique archaeological resources could cause or contribute to a significant cumulative impact.

The proposed Project, because of projects facilitated by WSAP, has the potential to contribute a significant incremental contribution to this significant cumulative impact; however, this impact could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of mitigation measures CUL-2 through CUL-6. With the implementation of these mitigation measures, the Project-specific, incremental contribution, taken into consideration with the cumulative projects' impacts to unique archaeological resources over the span of the WSAP, would not be cumulatively considerable because they would require identification and treatment of unique archaeological resources and thereby avoid or reduce significant impacts. With the implementation of these mitigation measures, a less than significant cumulative impact to unique archaeological resources would result.

**Impact 5.5-6: Would the project, when combined with other past, present, or reasonably foreseeable projects, disturb human remains, including those interred outside of dedicated cemeteries?**

**Less Than Significant Impact with Mitigation Incorporated.** There are 81 cemeteries in the County, including several in the unincorporated areas (Find a Grave 2024) and is a high likelihood that human remains also are interred outside of dedicated cemeteries; the WSAP would not cause or contribute to disturbing human remains, including those interred outside of dedicated cemeteries. There is no evidence of an existing significant cumulative impact from disturbance of human remains interred within dedicated cemeteries, and the WSAP would not cause or contribute to one. However, given the County's long history, there is a potential for human remains interred outside of dedicated cemeteries to be discovered. Findings of human remains interred outside of dedicated cemeteries have the potential to result in a significant cumulative impact.

The proposed Project, because of projects facilitated by WSAP, has the potential to contribute a significant incremental contribution to a cumulative impact; however, this impact could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of mitigation measure CUL-7. With the implementation of this mitigation measure, the Project-specific, incremental contribution, taken into consideration with the cumulative projects' impacts on human remains interred outside formal cemeteries over the span of the WSAP, would not be cumulatively considerable because the measure would ensure that the project proponent and County follow the law governing such finds, including by halting work, notifying the County Coroner, and taking other specified, appropriate actions to ensure the remains are treated with appropriate dignity. If human remains of Native American origin are discovered during work associated with a project facilitated by the WSAP, then the project proponent and/or the County would be required to comply with state laws relating to the disposition of Native American burials (e.g., Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98). With the implementation of this mitigation measure, a less than significant cumulative impact would result.

## 5.5.5 Level of Significance Before Mitigation

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.5-1:** Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
- **Impact 5.5-2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- **Impact 5.5-3:** Disturb any human remains, including those interred outside of dedicated cemeteries

## 5.5.6 Mitigation Measures

### Impact 5.5-1

CUL-1 Prior to demolition or alteration of buildings and/or structures or the construction of aboveground infrastructure with potentially significant impacts on historic architectural resources, the project proponent shall retain an architectural historian meeting the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (codified in 36 Code of Federal Regulations [CFR] Part 61; 48 Federal Register 44738–44739) (Qualified Architectural Historian) to conduct a historic resources assessment of affected properties. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a review of other pertinent archives and sources; a pedestrian field survey; recordation of all identified historic architectural resources on California Department of Parks and Recreation (DPR) 523 forms; evaluation of resources which may be eligible for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment for each

future project facilitated by WSAP measures and actions. If a historic architectural resource is found eligible by the Qualified Architectural Historian, then the Qualified Architectural Historian shall coordinate with the project proponent and County to ensure the project is constructed in conformance with the Secretary of the Interior's Standards. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to historic resources assessments and Secretary of the Interior's Standards plan reviews).

### Impact 5.5-2

CUL-2 Prior to conducting construction activities that would involve ground disturbance, future project proponents shall retain an archaeologist meeting the minimum PQS set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 Federal Register 44738–44739) (Qualified Archaeologist) to conduct an archaeological resources assessment. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a Sacred Lands File search at the California Native American Heritage Commission (NAHC); geoarchaeological review including a focused assessment of land use history and any available geotechnical data to assess the potential for subsurface archaeological resources; a pedestrian field survey in instances where ground surface is exposed; recordation of all identified archaeological resources on DPR 523 forms; evaluation of resources affected by the project for eligibility for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment. Resources that do not qualify as historical resources shall be considered by the Qualified Archaeologist for qualification as unique archaeological resources as defined in Public Resources Code Section 21083.2(g). The technical report also shall provide recommendations as to whether additional studies are warranted to further identify or evaluate archaeological resources (i.e., Extended Phase I boundary delineation, Phase II testing and evaluation) and if archaeological monitoring and Native American monitoring of ground disturbing activities is warranted (e.g., in areas where there is a higher potential to encounter buried resources). Prior to the initiation of field work for any Extended Phase I or Phase II investigation, the Qualified Archaeologist shall prepare a work plan outlining the investigation's objectives, goals, and methodology. When developing a work plan for Native American resources, the County shall consult with local Native American tribes. If archaeological/Native American monitoring is warranted, the Qualified Archaeologist shall determine the locations and duration of monitoring and reporting requirements. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to archaeological resources assessments, Extended Phase I and Phase II reports, and monitoring reports).

CUL-3 For projects with ground-disturbing activities that may encounter potentially significant archaeological resources, the Qualified Archaeologist shall implement a cultural resources sensitivity training program. The Qualified Archaeologist, or their designee, shall instruct all

construction personnel of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, applicable laws protecting archaeological resources, and confidentiality of discoveries. Native American monitor(s) shall be invited to participate in presenting tribal perspectives as part of the training curriculum. In the event that construction crews are phased, additional trainings shall be conducted for new construction personnel. The project proponent or its contractors shall ensure construction personnel are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

CUL-4 In the event archaeological resources are encountered during construction of a future project, the project proponent shall cease all activity within 50 feet of the find. The discovery shall be evaluated for significance by the Qualified Archaeologist. When assessing significance and developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. If the Qualified Archaeologist determines that the resource is significant—i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5(a) or for unique archaeological resource in Public Resources Code Section 21083.2(g)—the Qualified Archaeologist shall provide a method for avoidance and preservation in place, which shall be the preferred manner of mitigating impacts. If avoidance is infeasible, the Qualified Archaeologist shall develop a Phase III Archaeological Resources Data Recovery and Treatment Plan consistent with Mitigation Measure CUL-5. The Qualified Archaeologist also shall determine, based on the initial assessment of the discovery, whether the 50-foot buffer may be reduced. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to Extended Phase I, Phase II, and Phase III reports).

CUL-5 Treatment of Archaeological Resources. If the assessment conducted under Mitigation Measure CUL-2 or Mitigation Measure CUL-4 identifies significant archaeological resources—i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5(a) or for unique archaeological resource in Public Resources Code Section 21083.2(g)—then avoidance and preservation in place shall be the preferred manner of mitigating impacts. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If avoidance and preservation in place of significant archaeological resources is determined by the County to be infeasible, then the Qualified Archaeologist shall prepare a Phase III Archaeological Resources Data Recovery and Treatment Plan. The plan shall include: a detailed research design; justification for data recovery or other treatment methods depending on the nature of the resource's eligibility; excavation methodology; and, reporting and curation requirements. When developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. All Phase III reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center.

CUL-6 Disposition of Native American archaeological materials shall be determined by the County in coordination with local California Native American tribes. Disposition of materials may include curation at an accredited or nonaccredited repository, onsite or offsite reburial, and/or donation to a local tribe or public, nonprofit institution with a research interest in the materials, or local school or historical society in the area for educational purposes. The County shall consider tribal preferences when making a determination of disposition of Native American archaeological materials. Disposition of Native American human remains and associated funerary objects or grave goods (i.e., artifacts associated with human remains) shall be determined by the landowner in consultation with the County and the Most Likely Descendant. The project proponent shall curate all significant historic period archaeological material, or portions thereof at the discretion of the Qualified Archaeologist, at a repository accredited by the American Association of Museums that meets the standards outlined in 36 CFR Section 79.9. If no accredited repository accepts the collection, then the project proponent may curate it at a nonaccredited repository as long as it meets the minimum standards set forth in 36 CFR Section 79.9. If neither an accredited nor a nonaccredited repository accepts the collection, then the project proponent may offer the collection to a public, nonprofit institution with a research interest in the materials, or to a local school or historical society in the area for educational purposes.

### Impact 5.5-3

CUL-7 If human remains are encountered, then the project proponent or its contractor shall immediately halt work within 50 feet of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which require that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition. If the County Coroner determines that the remains are Native American, then the County Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the most likely descendant (MLD). The MLD may, with the permission of the land owner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The project proponent, County, and landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment. Until the project proponent, County, and landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices (e.g., the NAHC's "A Professional Guide for the Preservation and

Protection of Native American Human Remains and Associated Grave Goods" [2022], which reiterates statutory requirements), and that further activities take into account the possibility of multiple burials. If the NAHC is unable to identify an MLD; or the MLD identified fails to make a recommendation; or the landowner rejects the recommendation of the MLD and the mediation provided for in Public Resources Code Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

## 5.5.7 Level of Significance After Mitigation

The proposed Project, due to future development facilitated by the WSAP, would result in a less than significant impact to historical resources after implementation of mitigation measure CUL-1. The implementation of this mitigation measure would reduce significant impacts to historical resources resulting from projects facilitating the WSAP by avoiding or reducing the significant impact. Mitigation measure CUL-1 requires future project proponents to retain a qualified architectural historian to conduct a historic resources assessment of affected properties. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to historic resources assessments and Secretary of the Interior's Standards plan reviews) to avoid or minimize significant impacts to such resources.

The proposed Project, due to future development facilitated by the WSAP, would result in less than- significant impacts to unique archaeological resources after the implementation of mitigation measures CUL-2 through CUL-6. The implementation of these mitigation measures would reduce significant impacts to unique archaeological resources by avoiding or reducing the significant impact. Mitigation measure CUL-2 would require the project proponent to retain an archaeologist to conduct an archaeological resources assessment. The mitigation measure further requires that archaeological/Native American monitoring be considered to ensure that there is an opportunity to avoid or minimize inadvertent significant impacts to such resources. Mitigation measure CUL-3 requires that construction personnel involved in ground disturbing activities be trained in the identification of cultural resources to assist in avoidance or minimizing of inadvertent significant impacts to such resources. Mitigation measures CUL-4 and CUL-5 require that unique archaeological resources be avoided and preserved in place if feasible. If avoidance and preservation in place is not feasible, then data recovery is required to recover the scientifically consequential information contained in the resource, which would avoid or minimize significant adverse impacts to the resource. Mitigation measure CUL-6 provides for final disposition of archaeological materials, such as curation or donation to a Native American group or other entity, to reduce significant impacts to such resources by preserving the materials for those with research or educational interests.

The proposed Project, due to future development facilitated by the WSAP, would result in less-than-significant impacts to human remains after implementation of Mitigation measure CUL-7. This mitigation measure would reduce significant impacts on human remains by immediately halting construction activities in the event of a possible discovery to avoid or minimize impacts. Mitigation measure CUL-7 requires the project proponent and County to follow Health and Safety Code Section 7050.5(c) and Public Resources Code Section 5097.98 in

the event Native American human remains are encountered, which includes halting work, notifying the County Coroner, and consulting with the MLD. Further, the measure requires the project proponent, County, and landowner to work with the MLD for treatment of the remains to avoid or minimize impacts, or the landowner to reinter the remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance if an agreement cannot be reached to avoid or minimize impacts.

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# 5. Environmental Analysis
## CULTURAL RESOURCES

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# 5.6 ENERGY

This section of the Draft Program Environmental Impact Report (Draft PEIR) evaluates the potential for energy-related impacts associated with the Westside Area Plan (WSAP or Project) and ways in which it would reduce unnecessary energy consumption, consistent with the suggestions in Appendix F of the CEQA Guidelines. Energy service providers to the Project Area include Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE) for electrical service and Southern California Gas Company (SoCalGas) for natural gas.

During the scoping period for the Draft PEIR, written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, included in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.6.1 Environmental Setting

Section 21100(b)(3) of the CEQA Guidelines requires that an EIR include a detailed description of mitigation measures proposed to minimize significant effects on the environment, including but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the State CEQA Guidelines states that, to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the project description, environmental setting, and impact analysis portions of technical sections as well as through mitigation measures and alternatives.

In accordance with Appendices G and F of the State CEQA Guidelines, this Draft PEIR includes relevant information and analyses that address the energy implications of the proposed Project. This section summarizes the proposed Project's anticipated energy needs, impacts, and conservation measures. Other aspects of the proposed Project's energy implications are discussed elsewhere in this Draft PEIR, including Chapter 3, *Project Description*, and Sections 5.3, *Air Quality,* and 5.8, *Greenhouse Gas Emissions*.

#### 5.6.1.1 REGULATORY BACKGROUND

### Federal Regulations

#### *Federal Energy Policy and Conservation Act*

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of U.S. crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025 that required a fleet average of 54.5 miles per gallon (mpg) for model year 2025. However, on March 30, 2020, the U.S. Environmental Protection Agency (EPA) finalized an updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021–2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards established in 2012. Overall, SAFE requires a fleet average of 40.4 mpg for model year 2026 vehicles (85 Federal Register 24174 [April 30, 2020]).

Under direction of Executive Order (EO) 13990 issued by President Biden on December 21, 2021, the National Highway Traffic Safety Administration repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the National Highway Traffic Safety Administration finalized new fuel standards in response to EO 13990. Fuel efficiency under the standards proposed will increase 8 percent annually for model years 2024 to 2025 and 10 percent annually for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase relative to model year 2021 (Federal Register 2022).

On July 28, 2023, National Highway Traffic Safety Administration proposed new CAFE standards for passenger cars and light trucks built in model years 2027 to 2032, and new fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2027 to 2035. If finalized, the proposal would require an industry fleet-wide average of approximately 58 miles per gallon for passenger cars and light trucks in model year 2032, by increasing fuel economy by 2 percent year over year for passenger cars and by 4 percent year over year for light trucks. For heavy-duty pickup trucks and vans, the proposal would increase fuel efficiency by 10 percent year over year (NHTSA 2023).

### *Energy Independence and Security Act of 2007*

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The Act set higher CAFE standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2022).

### *Energy Policy Act of 2005*

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. This Act includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

### *National Energy Policy*

Established in 2001 by the National Energy Policy Development Group, the National Energy Policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

### *Natural Gas Pipeline Safety Act of 1968*

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration within the Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

## State Regulations

### *California Energy Commission*

The California Energy Commission (CEC) was created in 1974 under the Warren-Alquist Act as the State's principal energy planning organization to meet the energy challenges facing the state in response to the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecast statewide electricity needs.
- License power plants to meet those needs.
- Promote energy conservation and efficiency measures.
- Develop renewable energy resources and alternative energy technologies.
- Promote research, development and demonstration.
- Plan for and direct the state's response to energy emergencies.

### *California Public Utilities Commission*

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision, as well as goals for each economic sector, identifying specific near-term, mid-term, and long-term strategies to assist in achieving these goals. This plan sets forth the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.
- All new commercial construction in California will be zero net energy by 2030.
- Heating, Ventilation and Air Conditioning (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.

- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long-Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space accounts for 38 percent of the State's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use, and space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility types for electricity and gas consumption, accounting for approximately 10 percent of State's electricity and gas use.

The CPUC and CEC have adopted the following goals to achieve zero net energy (ZNE) levels by 2030 in the commercial sector:

**Goal 1:** New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.

**Goal 2:** 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.

**Goal 3:** Transform the commercial lighting market through technological advancement and innovative utility initiatives.

### *Renewables Portfolio Standard*

#### *Senate Bills 1078, 107, X1-2, and Executive Order S-14-08*

The California Renewables Portfolio Standard (RPS) Program was established in 2002 under SB 1078 (Sher) and 107 (Simitian). The RPS program required investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially 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. EO 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 (SB X1-2). The CPUC is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state. For year 2020, the three largest retail energy utilities provided an average of 43 percent of their supplies from renewable energy sources. Community choice aggregators provided an average of 41 percent of their supplies from renewable sources (CPUC 2021).

#### *Senate Bill 350*

Governor Jerry Brown signed SB 350 on October 7, 2015, which expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused)

of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. SB 350 also provides for the transformation of the California Independent System Operator into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by the California Independent System Operator to those markets, pursuant to a specified process.

#### *Senate Bill 100*

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirements. Under SB 100, the RPS for publicly owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

#### *Senate Bill 1020*

SB 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

### *Appliance Efficiency Regulations*

California's Appliance Efficiency Regulations contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California (California Code of Regulations [CCR] Title 20, Parts 1600–1608). These standards are updated regularly to allow consideration of new energy efficiency technologies and methods (CEC 2017).

### *Title 24, Part 6, Energy Efficiency Standards*

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (24 CCR Part 6). Part 6 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 August 11, 2021, the CEC adopted the 2022 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission in December 2021. The 2022 standards went into effect on January 1, 2023, replacing the 2019 standards. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric

appliances. In addition, the new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021).

### *Title 24, Part 11, Green Building Standards*

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. The mandatory provisions of CALGreen became effective January 1, 2011. In 2021, the CEC approved the 2022 CALGreen, which went into effect on January 1, 2023.

### *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 CAFE standards under "Federal," above). In January 2012, the California Air Resources Board approved the Pavley 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 (CARB 2017).

### *Executive Order N-79-20*

On September 23, 2020, EO N-79-20 was issued to set a time frame for the transition to zero-emissions (ZE) passenger vehicles, trucks, and off-road equipment. It directs the California Air Resources Board to develop and propose:

- Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs (zero-emission vehicles) sold in the California toward the target of 100 percent of in-state sales by 2035.
- Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035.

- Strategies to achieve 100 percent zero emissions from all off-road vehicles and equipment operations in California by 2035, in cooperation with other state agencies, the EPA, and local air districts.

On August 25, 2022, CARB adopted the Advanced Clean Cars II (ACC II) regulations that codifies the EO goal of 100 percent of in-state sales of new passenger vehicles and trucks are ZE by 2035. Starting in year 2026, ACC II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids (CARB 2024).

### *Advanced Clean Fleets Regulation*

In April 2023, CARB released the Advanced Clean Fleets (ACF) regulation to accelerate the transition to zero-emission medium- and heavy-duty vehicles (CARB 2023a). In conjunction with the Advanced Clean Trucks regulation, the ACF regulations help to ensure that medium- and heavy-duty ZEVs are brought to the market, by requiring certain fleets to purchase ZEVs. The ACF ZEV phase-in approach which provides initial focus where the best fleet electrification opportunities exist, sets clear targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public infrastructure network.

The ACF regulations cover four main elements:

1. **Manufacturer sales mandate.** Manufacturers may sell only zero-emission medium- and heavy-duty vehicles starting in 2036.

2. **Drayage fleets.**[1] Beginning January 1, 2024, trucks must be registered in the CARB Online System to conduct drayage activities in California. Non-zero-emission "legacy" drayage trucks could register in the CARB Online System through December 31, 2023. Legacy drayage trucks can continue to operate through their minimum useful life. Beginning January 1, 2024, only zero-emission drayage trucks may register in the CARB Online System. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.

3. **High priority and federal fleets**. High priority and federal fleets must comply with the Model Year Schedule or may elect to use the optional ZEV Milestones Option to phase ZEVs into their fleets:

    - Model Year Schedule: Fleets must purchase only ZEVs beginning 2024 and, starting January 1, 2025, must remove internal combustion engine vehicles at the end of their useful life as specified in the regulation.

    - ZEV Milestones Option (Optional): Instead of the Model Year Schedule, fleets may elect to meet ZEV targets as a percentage of the total fleet starting with vehicle types that are most suitable for electrification.

4. **State and local agencies**. State and local government fleets, including city, county, special district, and State agency fleets, would be required to ensure 50 percent of vehicle purchases are zero-emission

[1] Drayage trucks are in-use classes 7 and 8 on-road vehicles that transport containers and bulk goods to and from seaports and intermodal railyards. Land ports of entry, which provide controlled entry to or departure from the United States, are not considered seaports or intermodal railyards (CARB 2023b).

beginning in 2024 and 100 percent of vehicle purchases are zero-emission by 2027. Small government fleets (those with 10 or fewer vehicles) and those in designated counties would start their ZEV purchases beginning in 2027. Alternately, State and local government fleet owners may elect to meet ZEV targets using the ZEV Milestones Option. State and local government fleets may purchase either ZEVs or near-ZEVs, or a combination of ZEVs and near-ZEVs, until 2035. Starting in 2035, only ZEVs will meet the requirements.

The ACF regulations would also establish requirements that transform the medium- and heavy-duty vehicle sector and demonstrate independent utility through achievement of the following objectives:

- Achieve criteria and GHG emissions reductions consistent with the goals identified in the State Implementation Plan (SIP) Strategy and Scoping Plan.
- Provide emissions reductions in disadvantaged communities, thereby supporting the implementation of AB 617 (Garcia, C., Chapter 136, Statutes of 2017).

Support the goals of EO N-79-20 which calls for accelerated ZEV deployment with these targets:

- 100 percent ZE drayage by 2035.
- 100 percent ZE trucks and buses where feasible by 2045.
- Ensure requirements, such as ZEV deployment schedules and related infrastructure buildout, are technologically feasible, cost-effective, and support market conditions.
- Lead the transition away from petroleum fuels and towards electric drivetrains.
- Contribute towards achieving carbon neutrality in California pursuant to Senate Bill (SB) 100, and in accordance with Executive Order B-55-18.
- Mindfully set requirements to allow time for public ZE infrastructure buildout for smaller fleets or for regional haul applications who would be reliant on a regional network of public chargers.
- Ensure manufacturers and fleets work together to place ZEVs in service suitably and successfully as market expands.
- Establish a fair and level playing field among fleet owners.
- Craft the proposed project in a way that ensures institutional capacity for CARB to manage, implement, and enforce requirements.

## Energy Storage

California has set ambitious long-term goals for energy storage beyond 2026 to support its clean energy and climate goals. The state aims to reach 100 percent carbon-free electricity by 2045, which will require significant

investment in renewable energy sources like wind and solar, as well as energy storage technologies to balance the variability of these sources.

The California Independent System Operator (CAISO) has a total energy storage capacity of more than 3,160 megawatts (MW) as of June 2022 (CAISO 2022). This includes both large-scale and distributed energy storage systems, such as batteries, pumped hydroelectric storage, and thermal storage. CAISO is responsible for managing the electricity grid for much of California, and it has set a target of adding 3,300 MW of additional energy storage capacity by 2024 to support the integration of more renewable energy sources like wind and solar. As part of SB 100, load serving entities (LSE) were required to procure no less than 1.3 gigawatts (GW) of energy storage capacity by 2020, and 3 GW by 2030. Additionally, the CPUC has established a target of 15 GW of energy storage capacity by 2030 (CPUC 2022).

### *The Integrated Resource Plan*

CAISO develops a coordinated grid management plan to integrate the generation and storage capacities of LSEs, called the Integrated Resource Plan (IRP). The IRP is a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. The plan is developed in collaboration with LSEs, regulators, and other stakeholders and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system.

When an individual Battery Energy Storage (BES) facility or generation infrastructure (i.e., solar panels) comes online in California, it is typically included in the IRP through a process known as the Interconnection Queue. The Interconnection Queue is managed by the CAISO, which oversees the operation of the State's electricity grid.

### *The Interconnection Queue*

The Interconnection Queue is an application process that functions as a waiting list of proposed electricity generation and storage projects that are seeking to connect to the grid. When a new BES facility or generation infrastructure is proposed, the developer submits an application to CAISO to request an interconnection to the grid. CAISO evaluates the application to ensure that the facility meets technical and operational requirements, such as voltage regulation and frequency response, and that it can be integrated effectively into the grid.

Once the BES facility or generation infrastructure is approved by CAISO, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services, such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time.

Overall, the Interconnection Queue is an important mechanism for integrating new BES facilities and other electricity resources into the California grid, and for ensuring that the grid remains reliable and resilient as the state continues to transition to a cleaner and more sustainable energy system.

## Local

### *OurCounty: The Los Angeles Countywide Sustainability Plan*

On August 6, 2019, the County Board of Supervisors (Board) adopted the "OurCounty: The Los Angeles Countywide Sustainability Plan," which provides a framework to address sustainability in the County. OurCounty is focused on the incorporation of sustainability within 12 goals, 37 strategies, and 159 actions that include development of healthy community environments, buildings and infrastructure, land use, green economy, ecosystems, recreational opportunities, fossil-fuel-free energy, transportation systems, production and consumption of resources, food systems, governmental transparency, and funding partnerships.

Although OurCounty has not been codified in the County Code, a number of its goals, strategies, and actions promote the preparation and future adoption of ordinances designed to achieve its targets. The OurCounty goals are:

**Goal 1:** Resilient and healthy community environments where residents thrive in place. The County will protect vulnerable communities from pollution, reduce health and economic inequalities, ensure access to safe, clean, and affordable water, and support more resilient and inclusive communities.

**Goal 2:** Buildings and infrastructure that support human health and resilience. Old and new buildings and infrastructure will utilize more efficient technologies and practices that reduce resource use, improve health, and increase resilience.

**Goal 3:** Equitable and sustainable land use and development without displacement. Utilize policy tools, such as anti-displacement measures, so existing community members can remain in and strengthen their neighborhoods and networks while accepting new residents through more compact, mixed-use development. Pursue outcomes that are inclusive, safe, healthy, accessible, and transit oriented.

**Goal 4:** A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy. Support the growth of green economy sectors through procurement practices, land use authority, and various economic and workforce development incentives.

**Goal 5:** Thriving ecosystems, habitats, and biodiversity. Ensure that our ecosystems, including urban habitats, thrive even as our region becomes increasingly urbanized through careful planning.

**Goal 6:** Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities. Make parks and public lands more accessible and inclusive and manage them so that all residents may enjoy their benefits.

**Goal 7:** A fossil-fuel-free LA County. Move toward a zero-carbon energy system that reduces GHG emissions by eliminating fossil fuel production in the County. By addressing sources of pollution, air will be cleaner for the residents and the imminent dangers from the magnitude of climate change will be limited.

**Goal 8:** A convenient, safe, clean, transportation system that enhances mobility and quality of life while reducing car dependency. Provide a modern transportation system for all ages and abilities to access reliable, safe, affordable, and varied mobility choices that reduce pollution. Develop programs that focus on reducing the number of vehicle miles travelled, including transit systems, walking, biking, e-scooters, and zero-emission car-share services.

**Goal 9:** Sustainable production and consumption of resources. Improve our ability to promote integrative and collaborative solutions at the local and regional levels to effectively manage the County's waste, water, energy, and material resources into the future.

**Goal 10:** A sustainable and just food system that enhances access to affordable, local, and healthy food. Improve access to healthy food within County boundaries while optimizing purchasing power and business services to make food production more sustainable through leveraging of capital assets, public services, and regulatory authority.

**Goal 11:** Inclusive, transparent, and accountable governance that encourages participation in sustainability efforts, especially by disempowered communities. Build stronger communities and better-informed policy and programs by creating a more inclusive and accountable governance structure. This will ensure equity in sustainability policies and programs by having diverse representation in development, implementation, and management.

**Goal 12:** A commitment to realize OurCounty sustainability goals through creative, equitable, and coordinated funding and partnerships. Work with partners across the public, private, and nonprofit sectors for a more sustainable future through funding opportunities and leveraging of purchasing power.

The OurCounty Sustainability Plan also includes the following actions to decrease energy usage and reduce VMT.

- Adopt CALGreen Tier 1 building standards and identify which Tier 2 standards could be adopted as code amendments (Action 31).
- Create inventory of publicly-owned land and facilities near existing and future public transit and identify opportunities for transit-oriented development (Action 50).
- Collaborate with the City of Los Angeles, Santa Monica, and other members of the Building Decarbonization Coalition to develop building energy and emissions performance standards that put the County on a path to building decarbonization (Action 85).
- Install electric vehicle chargers at County facilities and properties for public, employee, and fleet use, prioritizing locations in disadvantaged communities (Action 92).

- Partner with local jurisdictions and transit agencies such as the City of Los Angeles and Metro to develop and implement a "Transit First" policy and mobility advocacy campaign that is consistent with and supportive of the County's Vision Zero Plan (Action 96).
- Develop and implement a transportation demand management ordinance that requires developers to incorporate measures such as subsidized transit passes and car share (Action 101).
- Pursue zero waste certification requirements at County facilities and develop incentives for businesses to achieve zero waste certification (Action 111).
- Adopt building code changes that improve water efficiency and reduce indoor and outdoor water use above current CALGreen standards (Action 115).
- Adopt an energy and water efficiency ordinance for existing buildings and require all privately owned buildings over 20,000 square feet to benchmark and report their energy and water use and demonstrate their pathway to energy and water efficiency (Action 117).
- Expand and enhance the energy efficiency programs offered by the Southern California Regional Energy Network (Action 118).

### *Los Angeles County Community Climate Action Plan*

The 2045 Los Angeles County Community Climate Action Plan (2045 CAP), approved by the Board in April 2024, identifies strategies, measures, and actions to reduce GHG emissions from community activities (LA County 2024). The 2045 CAP is the County's path to meet the goals of the Paris Agreement and achieve carbon neutrality for unincorporated areas of the County. It builds on previous climate action work from the County Community Climate Action Plan 2020 (2020 CAP) and includes a GHG emissions inventory from community-wide activities in unincorporated County in 2018, along with a baseline inventory for 2015. The 2045 CAP also includes projections of future emissions for 2030, 2035, and 2045 as well as targets to reduce GHG emissions by 40 percent below 2015 levels by 2030 and 50 percent below 2015 levels by 2035. In addition to these targets, the 2045 CAP also provides climate strategies, measures, and actions to reduce GHG emissions along with implementation and monitoring measures to ensure successful climate action.

The 2045 CAP includes strategies to reduce energy use in buildings and decarbonize the energy that is used, reduce indoor and outdoor water consumption, and increase the supply of energy to communities with zero-carbon or low-carbon electricity. Specifically, the 2045 CAP aims to reduce electricity use through requiring transition of existing buildings and standardizing new development to be all-electric (Measure E1 and E2), increasing the efficiency of existing buildings (Measure E4), increasing the use of recycled water which would reduce electricity associated with water conveyance and distribution (Measure E5), and reducing indoor and outdoor water use (Measure E6). Further, the 2045 CAP promotes adoption of renewable energy production in both new and existing residential and commercial development (Measure ES3), which would decrease grid energy demand and advance the County toward its electrification and zero net energy targets (Measures ES2, E1, and E2), all of which support the state's energy efficiency and renewable energy goals.

The 2045 CAP also aims to reduce vehicle miles traveled, emissions, and transportation fuel consumption. It includes transportation strategies that would reduce fuel consumption such as: locating development within High Quality Transit Areas; emphasizing nonmotorized travel through the County's Pedestrian Plan, Bicycle Master Plan, Active Transportation Plans, and Vision Zero Action Plan; expanding the electric vehicle charging infrastructure; and partnering with transit agencies to electrify LA County bus and shuttle fleets. Additionally, the 2045 CAP aims to electrify 100 percent of the County bus fleet by 2030 (Measure T7), which would reduce diesel, gasoline, and natural gas consumption from buses and would have the co-benefit of reducing air pollutant and GHG emissions. Similarly, the 2045 CAP aims to transition passenger and heavy-duty vehicles to ZEVs in line with the State's Mobile Source Strategy (Measure T6 and T8), which would reduce diesel, gasoline, and natural gas consumption of on-road vehicles in support of State goals. The 2045 CAP's waste measures (Measure W1 and W2) would also result in greater waste diversion from landfills and decreased waste generation per capita resulting in less fuel consumption from haul trucks to landfills and would generate energy through waste-to-energy conversion systems.

### *County Code of Ordinances*

#### *Energy*

The County has adopted by reference Title 31 Green Building Standards Code, which consists of Sections 102 through 119 of Chapter 1 of Title 26 of the County Code. The Green Building Code increases energy and water efficiency and reduces waste generation. The Green Building Code has co-benefits of reducing criteria pollutant emissions through the increase in energy efficiencies, which reduces building energy demand and the combustion of natural gas within buildings.

## 5.6.1.2 EXISTING CONDITIONS

## Electricity

### *Southern California Edison*

The West Los Angeles (Sawtelle VA), Franklin Canyon, Ladera Heights, View Park, and Windsor Hills communities of the Planning Area are in the SCE service area. which spans much of southern California from Orange and Riverside counties on the south to Santa Barbara County on the west to Mono County on the north (SCE 2024a). Sources of electricity sold by SCE in 2022, the latest year for which data are available, were:

- 33.2 percent renewable, consisting mostly of solar and wind
- 3.4 percent large hydroelectric
- 24.7 percent natural gas
- 8.3 percent nuclear
- 0.1 percent other
- 30.3 percent unspecified sources—that is, not traceable to specific sources (SCE 2024b)[2]

[2] The electricity sources listed reflect changes after the 2013 closure of the San Onofre Nuclear Generating Station, which is owned by SCE. Numbers are rounded up and may cause the total to not add up to exactly 100 percent.

### *Los Angeles Department of Water and Power*

The Marina del Rey, Ballona Wetlands, West Fox Hills, and Gilmore Island areas of the Westside Planning Area (Planning Area) are in the LADWP service area, which spans much of the urban areas of Los Angeles County (CEC 2024a). Total electricity consumption in LADWP's service area was 23,902 gigawatt-hours in 2022 (CEC 2024b).[3] Sources of electricity sold by LADWP in 2022, the latest year for which data are available, were:

- 35.6 percent renewable, consisting mostly of solar and wind
- 4.0 percent large hydroelectric
- 34.5 percent natural gas
- 13.3 percent nuclear (LADWP 2024)

### Gas

SoCalGas provides gas service in Los Angeles County, including to the Planning Area. The service area of SoCalGas spans much of the southern half of California, from Imperial County in the southeast to San Luis Obispo County in the northwest to part of Fresno County in the north to Riverside County and most of San Bernardino County in the east (CEC 2024c). Total natural gas consumption in SoCalGas's service area was 6,566 million therms for 2022 (CEC 2024d). As stated, the existing land uses within the WSAP consist primarily of residential uses and involve a mix of commercial uses, educational uses, office and industrial spaces, and open space, which currently generate natural gas demand.

### Fuel Consumption

California is among the top producers of petroleum in the country, with crude oil pipelines throughout the state connecting to oil refineries in the Los Angeles, the San Francisco Bay, and the Central Valley regions. In addition to producing petroleum, California is also one of the top consumers of fuel for transportation. With this sector accounting for approximately 35 percent of California's total energy demand in 2020, amounting to approximately 2,355.5 trillion British Thermal Units (BTU) (US EIA 2020a). In addition, in 2020, California's transportation sector consumed approximately 433 million barrels of petroleum fuels (US EIA 2020b). Furthermore, according to the California Energy Commission, California's 2021 fuel sales were approximately 13,818 million gallons of gasoline and 3,744 million gallons of diesel (CEC 2022a). In Los Angeles County, approximately 3,061 million gallons of gasoline and 224 million gallons of diesel fuel were sold in 2021 (CEC 2022b).

## 5.6.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

[3] One gigawatt-hour is equivalent to one million kilowatt-hours.

E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

## 5.6.3 Environmental Impacts

### 5.6.3.1 METHODOLOGY

Based on CEQA Guidelines Appendix F, Energy Conservation, in order to ensure energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, unnecessary, or inefficient use of energy resources. Environmental effects may include the proposed project's energy requirements and its energy use efficiencies by amount and fuel type during construction and operation; the effects of the proposed project on local and regional energy supplies; the effects of the proposed project on peak and base period demands for electricity and other forms of energy; the degree to which the proposed project complies with existing energy standards; the effects of the proposed project on energy resources; and the proposed project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. The provided energy and fuel usage information provided in this section are based on the following:

- **Building Energy.** The California Emissions Estimator Model (CalEEMod) Version 2022.1 default energy (i.e., electricity and natural gas) rates for non-residential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019. Use of the CalEEMod default energy rates results in conservative estimates compared to the recently adopted 2022 Building Energy Efficiency Standards because the commercial forecast is based on the energy demand per square foot of building space, land use subtype, and end use for the year 2019.[4] It is anticipated new buildings under the 2022 Standards would generally result in lower electricity use.

- **Fuel Usage.** Fuel usage associated with proposed Project-related vehicle trips fuel usage data was obtained from EMFAC2021, Version 1.0.2. Operational fuel usage calculations utilized passenger vehicle and truck trip data provided by Fehr and Peers.

### 5.6.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 3:** A community of distinct and livable places.

- **Policy LU 3.1.** Foster a land use pattern that brings everyday needs and amenities within walking distance of residential neighborhoods by encouraging neighborhood-scale retail and commercial uses adjacent to existing residential.

[4] As seen in Appendix D of the CalEEMod Users' Guide, the default energy dataset is based on 2019 consumption estimates from the CEC's Commercial Forecast and the Residential Appliance Saturation Survey (RASS). While these surveys were completed in 2019, the energy intensity estimates derived from the dataset represent buildings constructed in compliance with energy efficiency requirements of the 2019 Energy Code as well as older buildings that would, which have higher energy use rates. Therefore, the default energy consumption estimates provided in CalEEMod are conservative and overestimate expected energy use.

- **Policy LU 3.7.** Incentivize the inclusion of gathering places in commercial, mixed-use, and multi-family residential projects.

- **Policy LU 3.8.** Require new development along major thoroughfares and at the edges of commercial centers to be located and scaled to provide transitions in building height and bulk, consistent with the character of adjacent low-scale neighborhoods.

**Goal LU 4:** A diversity of land uses providing for community needs.

- **Policy LU 4.3.** Encourage commercial uses that serve and are accessible to adjoining residential neighborhoods.

**Goal LU 5:** Quality residential neighborhoods that are great places to live.

- **Policy LU 5.2.** Encourage the development of small-scale local-serving and community-gathering uses that are within walking distance of residential neighborhoods.

**Goal LU 6:** Vital and active commercial and mixed-use districts serving residents and visitors to the community.

- **Policy LU 6.7.** Encourage the development of multi-modal transportation hubs within larger commercial and mixed-use centers.

**Goal LU 8:** A sustainable built environment.

- **Policy LU 8.3.** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources, generate pollution and greenhouse gas emissions, and employ other sustainable measures (e.g., LEED, Living Building Challenge, other).

- **Policy LU 8.4.** Support private development that exceeds minimum site landscaping requirements and reduces the heat island effect, incorporating green roofs and decks, durable awnings, increased tree canopy in lots not covered by buildings, bioswales, and similar improvements.

- **Policy LU 8.5.** Incorporate sustainable landscaping and water management practices in parklands and medians and along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.).

**Goal LU 9:** A safe built environment and infrastructure.

- **Policy LU 9.1.** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).

- **Policy LU 9.2.** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation as necessary to protect adjoining neighborhoods and uses, while still operational.

**Goal LU 12 (Ladera Center):** A revitalized and pedestrian-oriented mixed-use center providing services accessible to residents of adjoining neighborhoods and opportunities for new housing development expanding the customer base for local businesses.

- **Policy LU 12.1.** Facilitate infill and new development of retail commercial and office uses integrated with housing on the upper levels or to the rear of commercial buildings.
- **Policy LU 12.2.** Promote the inclusion of landscape improvements, plazas, and other amenities and require buildings to be oriented and designed to contribute to an active pedestrian environment.
- **Policy LU 12.3"**Require that building heights be stepped back to transition with adjoining residential neighborhoods.

**Goal LU 13 (Wateridge Business Center):** Development of housing as infill on existing parking lots and long-term replacement of existing buildings and parking structures warranted by marketplace changes.

- **Policy LU 13.5.** Encourage the development of a multi-modal transportation hub independent of or in concert with infill development of the Slauson-Fairfax Home Depot Center.
- **Policy LU 13.6** Encourage the adaptive re-use and improvement of existing buildings.

**Goal LU 14 (Slauson-Fairfax/Home Depot Center):** Long-term intensification and development as a pedestrian-oriented mixed-use center incorporating housing with commercial uses.

- **Policy LU 14.6.** Encourage the development of a multi-modal transportation hub independent of or in concert with infill development of the Wateridge Center.

**Goal LU 20 (Leimert Park Adjacent):** Concentration of commercial and residential uses providing continuity with properties developed along Crenshaw Boulevard adjacent to the Metro Transit Station.

- **Policy LU 20.2.** Promote development densities/intensities that encourage transit use by residents and business customers.

**Implementation Program LUI 17.** Create educational materials promoting property maintenance and improvement and approaches for sustainable, healthy, and resilient development (e.g., solar, landscape, irrigation, other) and post on the County's website.

## Mobility Element

**Goal M 1:** A safe, efficient, and accessible transportation network for all Westside communities.

- **Policy M 1.3.** Work with LA Metro and other transit agencies (such as Culver City Bus, LADOT, LADPW The Link, Big Blue Bus, etc.) to improve the reliability and safety, and provide more modes of transit service tailored to the needs of residents.

- **Policy M 1.6.** Prioritize the upgrading of pedestrian infrastructure to align with federal, state, and local design guidance and ADA accessibility standards to ensure accessibility for vulnerable users.

**Goal M 3:** Improved access to reliable, safe, and high-quality transit service

- **Policy M 3.1.** Promote the use of transit by strategically orienting new developments around major transit stops and high-quality transit corridors. Apply the Los Angeles County Transit Oriented District (TOD) Design Guideline to new projects and emphasize design elements that facilitate transit use, including pedestrian walkways, bus plazas, and similar features.

- **Policy M 3.2.** Conduct a feasibility study to extend the Link: the Baldwin Hills Parklands shuttle to Marina del Rey and Ballona Wetlands through Ladera Heights, View Park and Windsor Hills.

- **Policy M 3.3.** Encourage convenient and safe transit, pedestrian, and bicycle linkages to/from transit service and mobility hubs by ensuring there are continuous bike and pedestrian pathways within one half mile of transit. Improve first/last-mile connections to Metro K Line stations, including Hyde Park, Leimert Park, and Martin Luther King Jr stations.

**Goal M 4:** Pedestrian and bicycle infrastructure is safe, connected, and comfortable for users of all ages and abilities.

- **Policy M 4.1.** Provide continuous pedestrian access along major streets by completing existing sidewalk infrastructure where gaps exist, such as La Brea Avenue between Slauson Avenue and Obama Boulevard, and Overhill Drive between Slauson Avenue and La Brea Avenue.

- **Policy M 4.2.** Enhance pedestrian crossing efficiency and safety at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive and intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Potential safety measures include pedestrian bridges, pedestrian signal phases, and high-visible crosswalks, pedestrian head starts, raised crossings, curb extensions, protected intersections etc.

- **Policy M 4.3**. Evaluate hotspots of bike-involved collisions (such as Slauson Avenue and La Brea Avenue) and implement safety measures for new bicycle facilities when updating the Los Angeles County Bicycle Master Plan.

- **Policy M 4.4.** Continue to build out and expand the existing trail and bicycle network in the community, connecting to parks and recreational areas, neighborhood commercial corridors, and other community destinations.

- **Policy M 4.5.** Fill in the existing bicycle network gap between the eastern and southern parts of Ladera Heights, View Park and Windsor Hills, as well as between the community and adjacent bicycle networks in Culver City and Leimert Park.

- **Policy M 4.7.** Expand the existing trail network by building safer pedestrian crossing infrastructure and adding signage and wayfinding between parks. Improve pedestrian connections between existing sidewalk and trail infrastructure in f the community with future uses on the site of the Inglewood Oil Field.

- **Policy M 4.8.** Provide safe and continuous pedestrian networks that are mindful of user, roadway, and community characteristics through improvements to existing pedestrian areas.

- **Policy M 4.9.** Establish pedestrian and bicycle pathways connecting residential neighborhoods to redeveloped commercial corridors (Slauson Avenue and 54th Street) to promote non-auto travel for short trips.

- **Policy M 4.12.** Explore planning and constructing a Complete Street along 54th Street that creates a neighborhood-friendly space lined with shops, restaurants, cafes, and other commercial establishments.

**Implementation Program MI 4.** Seek funding and implement multimodal infrastructure projects that promote Complete Streets along 54th Street, coordinating efforts with City of Los Angeles in places where the County shares authority of traffic control and maintenance of roadways.

**Implementation Program MI 5.** Conduct a feasibility study to assess the viability of extending the Link–Baldwin Hills Parklands shuttle. Evaluate potential ridership, infrastructure requirements and operational considerations. Engage with local communities and relevant stakeholders to gather input.

**Implementation Program MI 6.** Conduct an inventory of sidewalk conditions to identify locations with gaps and damaged sidewalks. This may include:

- Work with community members to develop prioritization and funding plans to maintain sidewalks in good repair.

- Prioritize capital projects that fill existing sidewalk gaps.

**Implementation Program MI 7.** Explore pathways with wayfinding signage along high-traffic corridors to improve pedestrian connectivity.

**Implementation Program MI 8**. Develop Community Pedestrian Plans for Ladera Heights, View Park-Windsor Hills, and West Fox Hills communities for inclusion in Step-by-Step Los Angeles County: Pedestrian Plans for Unincorporated Communities with the aim of promoting healthy and active lifestyles. Include following study items:

- Explore mobility programs to increase transit access for underserved communities and vulnerable users, focusing on addressing walking challenges along steep streets, especially for seniors and people with disabilities.

- Evaluate the feasibility of a pedestrian bridge at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive to enhance pedestrian safety and community connections.

- Conduct a walk audit with community members and stakeholders along Slauson Avenue, Overhill Drive, La Brea Avenue, La Cienega Boulevard, Centinela Avenue, and Angeles Vista Boulevard to identify intersections for potential improvements to pedestrian facilities. Focus on intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Identify locations to improve crosswalk design features, such as crosswalk markings, curb extensions, and median islands.

- Conduct safety studies at intersections identified from the walk audit mentioned above and consider signal timing modifications to enhance safety for people crossing with lower mobility speeds, including youth, seniors, and the disabled. Potential signal timing improvements includes increased crossing time, Leading Pedestrian Intervals (LPI), protected turns, etc.

### Conservation and Open Space Element

**Goal COS 4:** Resources are conserved and infrastructure is adapted to improve resilience and minimize contributions to climate change.

- **Policy COS 4.1.** Encourage community members and existing developments to upgrade water conserving mechanisms such as stormwater capture systems, graywater systems, water-efficient appliances, and drought-tolerant landscape planting.

- **Policy COS 4.2.** Expand opportunities for EV charging at existing public facilities such as Ladera Park and Kenneth Hahn State Recreation Area.

## 5.6.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.6-1: Implementation of the proposed Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. [Threshold E-1]**

### Short-Term Construction Impacts

**Less Than Significant Impact.** Due to the nature of the WSAP as a planning document, approval of the WSAP would not directly result in development of the land uses and therefore would not directly result in energy consumption. However, future development following the adoption of the WSAP may result in construction activities on the identified 12 Opportunity Sites[5], which would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use. Electricity use would fluctuate according to the phase of construction.

[5] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Electricity use from construction activities would be short-term, limited to working hours, and only used for necessary construction-related activities. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

Natural gas is not typically required to power construction equipment, and therefore is not anticipated during construction phases. Accordingly, there would be no expected natural gas demand generated by construction of future development facilitated by adoption of the WSAP. If natural gas is used during construction, it would be in limited amounts and on a temporary basis, would specifically be used to replace or offset diesel-fueled equipment, and as such would not result in a substantial ongoing demand.

Future development projects would also temporarily increase demands for energy associated with transportation. Transportation energy use depends on the type and number of trips, vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. Additionally, transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. In addition, all construction equipment would cease operating upon completion.

To limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with section 2449 of CCR, Title 13, Article 4.8, Chapter 9, which limits nonessential idling of diesel-powered off-road equipment to 5 minutes or less. Also, construction trips would not result in unnecessary use of energy since the Planning Area is centrally located and is served by numerous regional freeway systems (e.g., Interstate [I]-405, I-10, and State Route [SR]-90) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the proposed Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

## Long-Term Impacts During Operation

**Less Than Significant Impact.** Operation of future development projects accommodated under the WSAP would create additional demands for electricity and natural gas compared to existing conditions. Operational use of electricity and natural gas would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; and lighting.

### *Electrical and Natural Gas*

Depending on location within the Planning Area, electrical service would be provided by SCE and LADWP through connections to existing electrical lines and new infrastructure as needed. As shown in Table 5.6-1, *Year 2045 Forecast Electricity Consumption*, by horizon year 2045, electricity use in the Planning Area would increase by 24,615,962 kilowatt-hours (kWh) per year. This is a conservative estimate, as the 12 Opportunity Sites that could undergo future development changes are already developed with existing uses that require electricity.

**Table 5.6-1 Year 2045 Forecast Electricity Consumption**

| Land Use | Electricity (kWh/year) |
|---|---|
| Residential Electricity Consumption | 22,186,567 |
| Nonresidential Electricity Consumption | 2,429,395 |
| **Total** | **24,615,962** |

Source: CalEEMod, Version 2022.1.
Note: kWh=kilowatt-hour

Natural gas for future development projects in the Planning Area would be provided by SoCalGas, which has facilities throughout the Los Angeles County region. As shown in Table 5.6-2, *Year 2045 Forecast Natural Gas Consumption*, by horizon year 2045, gas consumption in the Planning Area would increase by 68,267,141 kilo-British thermal units per year (kBTU/yr). This is a conservative estimate, as the 12 Opportunity Sites that could undergo future development changes are already developed with existing uses that require natural gas.

**Table 5.6-2 Year 2045 Forecast Natural Gas Consumption**

| Land Use | Natural Gas (kBTU/year) |
|---|---|
| Residential Natural Gas Consumption | 67,065,650 |
| Non-Residential Natural Gas Consumption | 1,201,491 |
| **Total** | **68,267,141** |

Source: CalEEMod, Version 2022.1.
Note: kBTU= kilo-British thermal unit

While the electricity and natural gas demand for the Planning Area would increase compared to existing conditions, future development facilitated by adoption of the WSAP would comply with the applicable provisions of Title 24 and the CALGreen Code in addition to the County's Title 31 in effect at the time of building permit issuance, which may include greater use of energy and water efficient fixtures and fittings, energy efficient mechanical systems, and water efficient landscapes. Furthermore, the WSAP includes policies such as Policies LU 8.3, LU 8.4, and LU 8.5 that would support promoting energy efficient designs, water conservation, and a reduction in nonrenewable energy use. Therefore, operations of future development facilitated by adoption of the WSAP would not result in the wasteful, inefficient, and unnecessary consumption of electricity. Impacts are considered less than significant and no mitigation is required.

### *Transportation Energy*

The estimated operational transportation fuel demand from existing development and future development facilitated by adoption of the WSAP is provided in Table 5.6-3, *Estimated WSAP Operational Transportation Energy Demand*. As shown in the table, compared to existing conditions, the proposed Project would result in an increase in VMT for gasoline-, electric-, and diesel-powered vehicles. Although annual VMT would increase for diesel- and gasoline-powered vehicles, the fuel efficiency would increase by 1.25 mpg and 7.12 mpg, respectively, through regulatory changes and improved technology over time. The overall VMT shown in Table 5.6-3 would

be primarily attributable to the population growth associated with the WSAP, which is shown in Table 5.14-3 in Chapter 5.14, *Population and Housing*. While VMT and fuel usage would generally increase from implementation of the proposed Project when compared to existing uses, the fuel efficiency of vehicles is expected to improve compared to existing conditions. For electric-powered vehicles, annual VMT would increase by 47,700,522 miles, and annual consumption would increase by 16,311,859 kWh. The large increases in VMT and electricity usage for electric-powered vehicles are primarily based on the assumption in EMFAC that a greater mix of light-duty automobiles would be electric-powered in future years based on regulatory (e.g., Advanced Clean Cars) and consumer trends. However, overall, the efficiency of electric vehicles would have a slight increase of 0.15 kWh/mile under buildout year conditions compared to existing conditions.

**Table 5.6-3 Estimated WSAP Operational Transportation Energy Demand**

| Fuel Type | Existing Conditions Year 2023 | WSAP Future Development Buildout (2045) | Net Change Between WSAP Year 2045 and Existing Conditions Year 2023 |
|---|---|---|---|
| **Gasoline** | | | |
| VMT (annual)[1] | 352,956,165 | 436,217,421 | 83,261,257 |
| Gallons (Annual) | 14,596,275 | 13,937,559 | (658,716) |
| Miles Per Gallon | 24.18 | 31.30 | 7.12 |
| **Diesel** | | | |
| VMT (annual)[1] | 19,084,376 | 19,673,042 | 588,666 |
| Gallons (Annual) | 2,286,493 | 14,706,298 | (236,159) |
| Miles Per Gallon | 8.35 | 9.60 | 1.25 |
| **Compressed Natural Gas** | | | |
| VMT (annual)[1] | 1,187,486 | 597,577 | (589,909) |
| Gallons (Annual) | 266,407 | 65,492 | (200,915) |
| Miles Per Gallon | 4.46 | 9.12 | 4.67 |
| **Electricity** | | | |
| VMT (annual)[1] | 14,540,021 | 62,240,543 | 47,700,522 |
| kWh (Annual) | 5,325,542 | 21,637,402 | 16,311,859 |
| Miles Per kWh | 2.73 | 2.88 | 0.15 |
| **Total VMT** | **387,768,047** | **518,728,583** | **130,960,536** |

Source: EMFAC2021 Version 1.0.2.
Notes: VMT = vehicle miles traveled; CNG = compressed natural gas; kWh = kilowatt hour
[1] Based on daily VMT data provided by Fehr and Peers. VMT per year based on a conversion of daily VMT x 347 days per year to account for less travel on weekend, consistent with CARB statewide GHG emissions inventory methodology (CARB 2008).

The improvement in fuel efficiency would be attributable to regulatory compliance (e.g., CAFE standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to residents or land use development projects, but to car manufacturers. Thus, residents and employees in the Planning Area do not have direct control in determining the fuel efficiency of vehicles that are manufactured and made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population in the Planning Area with more fuel-efficient vehicle options. Furthermore, while the demand for electricity would increase under

the proposed Project, in conjunction with the regulatory (i.e., Renewables Portfolio Standard, SB 350, SB 100, and SB 1020) and general trends toward increasing the supply and production of energy from renewable sources, it is anticipated that a greater share of electricity used to power electric vehicles would be from renewable sources in future years (e.g., individual photovoltaic systems, purchased electricity from SCE or LADWP, and/or purchased electricity from SCE or LADWP that is generated from renewable sources).

In addition to regulatory compliance that would contribute to more fuel-efficient vehicles and less demand in fuels, the proposed Project objectives include focusing new housing and commercial development in existing commercial corridors and centers and in proximity to transit; prioritizing local serving businesses; fostering land use development patterns and densities and improving streetscapes that promote a more active pedestrian environment; and improving the variety of travel choices for residents such as walking, biking, and public transit. Changes to the Land Use Policy Map and zoning designations under the proposed Project for the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities include rezoning to permit mixed-use development and higher densities in major commercial corridors and centers and along high-quality transit corridors. Additionally, the Land Use Element includes various goals and policies that support these objectives. For example, Policies LU 3.1, LU 4.3, LU 5.2, and LU 12.1 focus on supporting land use patterns where needs and amenities are within walking distance. Policies LU 6.7, LU 13.5, and 14.6 focuses on developing multi-modal hubs within larger commercial and mixed-use centers. Furthermore, Policy LU 20.2 focuses on promoting development densities/intensities that encourage transit use by residents and business customers.

The proposed Project also supports the aforementioned objectives through the goals and policies of the Mobility Element. Policy M 3.1 focuses on strategically orienting new developments around major transit stops and high-quality transit corridors while Policy M 3.3 focuses on first/last mile connections to Metro K Line stations. The policies under Goal M 4 support improvements to the pedestrian and bicycle infrastructure. For example, Policy M 4.4 focuses on buildout and expansion of the existing trail and bicycle network in the community connecting to recreational areas, neighborhood commercial corridors, and other community destinations. Policy M 4.12 focuses on exploring the development of a Complete Street along 54th Street.

Overall, as discussed above, components of the proposed Project would contribute to building denser communities and improving active and public transit infrastructure. These components would contribute to reducing passenger vehicle trips, thereby also potentially reducing VMT and overall transportation fuel demands. Additionally, as also discussed, compliance with CAFE standards over the coming years would increase the fuel efficiency of vehicles available to the population. Therefore, implementation of proposed goals and policies under the proposed Project in conjunction with and complementary to regulatory requirements would ensure that transportation fuels-related energy demand associated with growth under the proposed Project would not be inefficient, wasteful, or unnecessary. Therefore, energy impacts associated with implementation and operation of land uses accommodated under the WSAP would be less than significant.

**Impact 5.6-2: The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. [Threshold E-2])**

**Less Than Significant Impact.** The following discussions evaluate consistency of the proposed Project to the OurCounty Sustainability Plan and the 2045 CAP.

## OurCounty Sustainability Plan

The WSAP would generally align with the vision and goals of the OurCounty Sustainability Plan pertaining or related to building energy and transportation fuels. Project objectives include focusing new housing and commercial development in existing commercial corridors and centers and in proximity to transit; prioritizing local serving businesses; fostering land use development patterns and densities and improving streetscapes to promote a more active pedestrian environment; and improving the variety of travel choices for residents such as walking, biking, and public transit. The proposed Project includes various goals and policies in its Land Use Element (e.g., Policies LU 3.1, LU 4.3, LU 5.2, LU 6.7, LU 12.1, and LU 20.2) and Mobility Element (Goal M 4) to support these objectives. Overall, this approach to land use and transportation planning would support the goal of reducing VMT from passenger vehicles and thereby reducing demand on transportation fuels.

In addition, future development facilitated by adoption of the WSAP would comply with the applicable provisions of Title 24 and the CALGreen Code in addition to the County's Title 31 in effect at the time of building permit issuance, which may include greater use of energy and water efficient fixtures and fittings, energy efficient mechanical systems, submetering, and water efficient landscapes. Furthermore, the WSAP includes policies such as Policies LU 8.3, LU 8.4, and 8.5 that would support promoting energy efficient designs, water conservation, and a reduction in nonrenewable energy use. Therefore, the WSAP would not conflict with the OurCounty Sustainability Plan.

## Los Angeles County Community Climate Action Plan

The 2045 CAP builds on previous climate action work from the 2020 CAP. The 2045 CAP identifies strategies, measures, and actions to mitigate emissions from community activities in the unincorporated County. The 2045 CAP is designed to be consistent with the reduction measures and recommendations contained in CARB's 2017 and 2022 Scoping Plan. The Pavley Program, Renewable Portfolio Standard, Low Carbon Fuel Standard, SB 375 land use and transportation strategies, energy efficiency measures, solar photovoltaic system measures, vehicle and fuel efficiency measures, landfill methane capture, and urban forestry practices are all measures in the 2017 and 2022 Scoping Plan that are also included in the 2045 CAP.

The WSAP aligns with the policies and programs of the 2045 CAP relating or pertaining to energy and reducing VMT. As discussed in Impact GHG-1 and consistency with the OurCounty Sustainability Plan, the proposed land uses, land use development patterns, Project objectives, and goals and policies under the proposed Project would be consistent with targeting growth near transit, active transportation, and commercial services and expanding pedestrian infrastructure to facilitate walking, biking, and transit use in place of vehicular travel. Additionally, the proposed Project would also align with the 2045 CAP strategies related to reducing nonrenewable energy demand through energy and water efficiency. Furthermore, WSAP includes Policy COS 1.2, which directs new development in the Planning Area to demonstrate consistency with the 2045 CAP Consistency Checklist or implement alternate project emissions reduction measures. Thus, any future development projects that are facilitated by land use and zoning changes in the WSAP would be required to be consistent with the County's 2045 CAP goals and policies. Future development in accordance with the WSAP would not conflict with the 2045 Climate Action Plan and impacts would be less than significant.

## 5.6.4 Cumulative Impacts

The area considered for cumulative impacts to electricity and natural gas supplies are the service areas of SCE LADWP, and SoCalGas. Other projects in the SCE, LADWP, and SoCalGas service areas would be required to comply with the Building Energy Efficiency Standards and CALGreen, which would contribute to minimizing wasteful energy consumption and promoting renewable energy sources. Furthermore, vehicles complying with the CAFE standards would be available statewide. Overall, as discussed under Impact 5.6-1, energy consumption (i.e., building energy and transportation fuels) resulting from implementation of the proposed Project would not be considered inefficient, wasteful, or unnecessary. Implementation of the proposed Project would therefore not contribute to any cumulative energy impacts when considered together with cumulative development projects and would not be cumulatively considerable.

## 5.6.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.6-1 and 5.6-2.

## 5.6.6 Mitigation Measures

No mitigation measures required.

## 5.6.7 Level of Significance After Mitigation

Impacts 5.6-1 and 5.6-2 would be less than significant.

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# 5. Environmental Analysis
## ENERGY

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# 5.7 GEOLOGY AND SOILS

This section analyzes the potential impacts from the implementation of the Westside Area Plan (proposed Project or WSAP) on geology and soils. The analysis includes an evaluation of potential impacts related to seismicity, fault rupture, seismically induced ground failure, soil erosion, and unstable soils. A description of the existing geology and soils resources in the unincorporated communities of the Westside Planning Area (Planning Area) and surrounding areas is also provided in this section. The analysis is based on publicly available information from the California Geological Survey (CGS), U.S. Geological Survey, Southern California Earthquake Data Center, California Department of Water Resources, and Los Angeles County Department of Public Works (DPW). The information in this section is based in part on information contained in the:

- *Paleontological Assessment Memorandum for the Westside Area Plan Project, Los Angeles County, California* (ECORP 2024) (see Appendix F to this Draft PEIR).

During the scoping period for the Draft Program Environtmel Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.7.1 Environmental Setting

### 5.7.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *National Pollutant Discharge Elimination System*

In compliance with the National Pollutant Discharge Elimination System (NPDES) program (under Section 402 of the Clean Water Act), all facilities that discharge pollutants from any point source into waters of the United States must have an 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 Stormwater Program. Nonmunicipal sources include industrial and commercial facilities. Specific NPDES program areas applicable to these industrial/commercial sources are Process Wastewater Discharges, Non-process Wastewater Discharges, and the Industrial Stormwater Program. NPDES issues two basic permit types: individual and general. The United States Environmental Protection Agency (USEPA) has focused on integrating the NPDES program further into watershed planning and permitting. 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 one 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 USEPA's Stormwater 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 one acre. The MS4 permit in effect for the Planning Area is Order No. R4-2021-0105, issued by the Los Angeles Regional Water Quality Control Board (RWQCB) in 2021. The Los Angeles County Department of Public Works (LACDPW) enforces conditions of the MS4 NPDES permit on development and redevelopment projects under Los Angeles County's jurisdiction.

## State Laws, Regulations, and Policies

### *The Alquist-Priolo Earthquake Fault Zoning Act*

The Alquist-Priolo Earthquake Fault Zoning Act (California Public Resources Code, Section 2621) was enacted by the State of California in 1972 to address the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Earthquake Fault Zoning Act was a direct result of the 1971 San Fernando Earthquake in Southern California, which was associated with extensive surface fault ruptures that damaged homes, commercial buildings, and other structures. The primary purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent the construction of buildings intended for human occupancy on the surface traces of active faults. Structures considered for human occupancy are those that are intended for supporting or sheltering any use or occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year (14 Code of Federal Regulations [CFR], Section 3601). The Alquist-Priolo Earthquake Fault Zoning Act is also intended to provide citizens with increased safety and minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings against ground shaking.

The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Maps are distributed to all affected cities and counties for the controlling of new or renewed construction and are required to sufficiently define potential surface rupture or fault creep. The State Geologist is charged with continually reviewing new geologic and seismic data and revising existing zones and delineating additional earthquake fault zones when warranted by new information.

Local agencies must enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requires. According to the Alquist-Priolo Earthquake Fault Zoning Act, before a project can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of

the fault and must be set back a minimum of 50 feet. The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in CGS Special Publication 42, Fault-Rupture Hazard Zones in California.

Alquist-Priolo Earthquake Fault Zones traverse the Ladera Heights, View Park, and Windsor Hills communities in the Planning Area.

### *Seismic Hazards Mapping Act*

To address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (California Public Resources Code [PRC], Sections 2690–2699). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects in these zones until the geologic and soil conditions of the project site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the safety elements of their general plans and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under California PRC, Section 2697, cities and counties shall require, prior to the approval of a project in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval. California PRC, Section 2698, does not prevent cities and counties from establishing policies and criteria that are stricter than those established by the State Mining and Geology Board.

State publications supporting the requirements of the Seismic Hazards Mapping Act include CGS Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, and Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California. The objectives of Special Publication 117A are to assist in the evaluation and mitigation of earthquake-related hazards for projects in designated zones of required investigations and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act. Special Publication 118 implements the requirements of the Seismic Hazards Mapping Act in the production of Probabilistic Seismic Hazard Maps for the state.

### *California Building Code*

The State regulations protecting structures from geo-seismic hazards are contained in the California Building Code (CBC) (24 California Code of Regulations [CCR], Part 2), which is updated on a triennial basis. These regulations apply to public and private buildings in the state. Until January 1, 2008, the CBC was based on the then-current Uniform Building Code and contained additions, amendments, and repeals specific to building conditions and structural requirements of the State of California. The 2019 CBC, effective January 1, 2020, is based on the current (2018) International Building Code and enhances the sections dealing with existing structures. Seismic-resistant construction design is required to meet more stringent technical standards than those set by previous versions of the CBC. Chapters 16 and 16A of the 2019 CBC include structural design requirements governing seismically resistant construction, including, but not limited to, factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location

and the proposed building design. Chapters 18 and 18A include, but are not limited to, the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). Chapter 33 of the 2019 CBC includes, but is not limited to, requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

### *California Division of Occupational Safety and Health*

The California Division of Occupational Safety and Health (Cal/OSHA) protects and improves the health and safety of working men and women in California. Cal/OSHA Regulations (Title 8 of the CCR, Chapter 4, Division of Industrial Safety, Subchapter 4, Construction Safety Orders, Article 6, Excavations, Section 1541.1, Requirements for Protective Systems), includes protections to avoid excavation cave-ins, design of sloping and benching systems, and design of support systems.

### *Construction General Permit (State Water Resources Control Board Order 2009-0009-DWQ, as Amended)*

For stormwater discharges associated with construction activity in the state, the State Water Resources Control Board (SWRCB) has adopted the General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) to avoid and minimize water quality impacts attributable to such activities. In accordance with NPDES Phase I permit requirements, the Construction General Permit applies to all projects in which construction activity disturbs one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which would include and specify water quality BMPs designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off-site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals, as defined by the SWRCB).

### *Public Resources Code Section 5097.5 and Section 30244 (Paleontological Resources)*

State requirements for paleontological resource management are included in Public Resources Code Section 5097.5 and Public Resources Code Section 30244. Section 5097.5 states that "a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." Section 5097.5 also states that "a violation of this section is a misdemeanor, punishable by a fine not exceeding ten thousand dollars ($10,000), or by imprisonment in a county jail not to exceed one year, or by both that fine and imprisonment." This section defines public lands as "lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof."

## Regional Laws, Regulations, and Policies

No regional laws, plans, or policies related to geology and soils are applicable to the Project.

## Local Laws, Regulations, and Policies

### *Los Angeles County Code*

The Los Angeles County Code consists of the regulatory, penal, and administrative ordinances for the County. Components of the County Code that are applicable to geology and soils are identified below.

**Title 22- Planning and Zoning.** Chapter 22.104- Hillside Management Areas, was established to ensure that development preserves and enhances the physical integrity and scenic value of Hillside Management Areas (HMAs), to provide open space, and to be compatible with and enhance community character. These goals are to be accomplished by: (1) locating development outside of HMAs to the extent feasible; (2) locating development in the portions of HMAs with the fewest hillside constraints; and (3) using sensitive hillside design techniques tailored to the unique site characteristics. The HMA Ordinance and Hillside Design Guidelines (Title 22- Appendix I, Hillside Design Guidelines) implement the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. HMAs are defined as areas with 25 percent or greater natural slopes. The Hillside Design Guidelines are required for development in HMAs, unless exempted under the provisions of the ordinance. In hillside areas with less than 25 percent slope, use of the guidelines is optional but encouraged. A Sensitive Hillside Design Measures Checklist is used by applicants to determine whether the Hillside Design Guidelines would be applicable.

**Title 26- Building Code.** In addition to the adoption of the CBC by reference, the 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 organized as Title 26, Appendix J– Grading, 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. Section J110 of this appendix also contains provisions for construction-related erosion control, including the preparation of cut-and-fill slopes and the implementation of erosion control measures such as check dams, cribbing, riprap, or other devices or methods. The Building Code also includes seismic safety requirements for certain building types, such as older concrete tilt-up buildings and unreinforced masonry bearing wall buildings (refer to Title 26, Chapters 95 and 96). The stated goal of Chapter 95 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 and provides systematic procedures and standards for identification of such concrete tilt-up wall buildings, and time periods under which these buildings are required to be structurally analyzed and anchored. Where analysis finds deficiencies, this Chapter requires the building to be strengthened or demolished. The purpose of Chapter 96 is to promote public safety and welfare by reducing the risk of death or injury otherwise resulting from earthquake damage to certain buildings constructed before March 20, 1933, which have insufficient resistance to moderate or strong earthquakes.

#### *Municipal Separate Storm Sewer System Permit*

The Planning Area is subject to the waste discharge requirements of NPDES Permit No. CAS004001 and the MS4 Permit (Order No. R4-2021-0105), which was issued by the Los Angeles RWQCB in 2021. The County Flood Control District, unincorporated communities, and 84 incorporated cities in the 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) to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit non-stormwater discharges, and protect receiving waters. The MS4 permit also includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, non-stormwater management, and waste management on construction sites.

### *Los Angeles County General Plan*

#### *Safety Element*

The Safety Element of the County's General Plan provides the following goals and policies potentially relevant to geology and soils for the proposed Project (County of Los Angeles 2022):

**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 structures for human occupancy adjacent to active faults unless a comprehensive fault study that addresses seismic hazard risks and proposes appropriate actions to minimize the risk is approved.
- **Policy S 1.3.** Require developments to mitigate geotechnical hazards, such as soil instability and landslides, in Hillside Management Areas through siting and development standards.
- **Policy S 1.4.** Support the retrofitting of unreinforced masonry structures and soft-story buildings to help reduce the risk of structural and human loss due to seismic hazards. The Conservation and Natural Resources Element of the General Plan provides the following goals and policies potentially relevant to the subject of geology and soils for the proposed Project.

#### *Conservation and Natural Resources Element*

The Conservation and Natural Resources Element of the General Plan provides the following goal and policies related to grading and natural hazards and for the treatment of paleontological resources (County of Los Angeles 2015):

**Goal C/NR 13:** Protect visual and scenic resources.

- **Policy C/NR 13.5.** Encourage required grading to be compatible with the existing terrain.

- **Policy C/NR 13.8**. Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.

**Goal C/NR 14:** Protect historic, cultural, and paleontological resources.

- **Policy C/NR 14.1.** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- **Policy C/NR 14.2.** Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- **Policy C/NR 14.5.** Promote public awareness of historic, cultural, and paleontological resources.
- **Policy C/NR 14.6.** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

### 5.7.1.2 EXISTING CONDITIONS

As previously discussed, the Planning Area includes the unincorporated communities of Ladera Heights, View Park, and Windsor Hills, Marina del Rey, Ballona Wetlands, and Westside Islands (West Los Angeles, West Fox Hills, Franklin Canyon, and Gilmore Island). Community members and planning staff identified 12 Opportunity Sites[1] within the Planning Area that would undergo land use and zoning changes to support increased residential density. Ten of the 12 Opportunity Sites are within the Ladera Heights, View Park, and Windsor Hills communities and one of the 12 Opportunity Sites is within the West Fox Hills community. As further discussed in Chapter 4, *Environmental Setting*, of this Draft PEIR, the 12 Opportunity Sites and Inglewood Oil Field are all within urbanized areas of the Planning Area and are disturbed and/or developed. A discussion of the geologic setting for the Planning Area, including the 12 Opportunity Sites and Inglewood Oil Field, is provided below.

#### Geologic Setting

The Planning Area is in southwestern Los Angeles County and is part of the present-day Los Angeles basin, which is a northwest-trending lowland coastal plain approximately 50 miles long and 20 miles wide. The surficial and bedrock geology underlying the Planning Area has been mapped by a variety of agencies and organizations, including the United States Geological Survey (USGS) and the California Division of Mines and Geology, now, the CGS. Desktop studies of the geology for the Planning Area indicate that the underlying geologic units are fairly consistent across the Planning Area, with dominance of Quaternary older alluvium (Qoa) consisting of lake, playa, and terraced deposits (ECORP 2024). In addition, there are smaller traces of Quaternary alluvium consisting of lake, playa, and terrace deposits consisting of unconsolidated and semi-consolidated nonmarine and marine deposits closer to the portions of the Planning Area near the coast, particularly Marina del Rey and

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

Ballona Wetlands. Further north, sedimentary and metasedimentary rocks of Jurassic age are commonly found near Franklin Canyon. These rocks are generally devoid of fossils.

### *Soils*

For more than 100 years, the soils in the Planning Area have been periodically studied and mapped by various agencies and researchers, including the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS). Soil surveys of the area have long recognized the diverse soil types and conditions in Los Angeles County. An early twentieth century investigation identified as many as 17 different soil types in the region. Most of the soils were made up of sands, loams, sandy loams, and adobe, whereas granitic gravel was locally noted in soils found close to major drainages or along mountain fronts.

The Planning Area is predominantly made up of Ramona Loam, Ramona Sandy Loam, and Yolo Loam soil types (County of Los Angeles 2014).

### *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 in 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 north or east side of the fault moves right and the south or west side moves left; and reverse faulting, where the rock layer above the fault moves up (County of Los Angeles 2021).

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 (i.e., strike-slip) 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 2021).

Four active faults traverse the Planning Area: the Hollywood Fault, Overland Avenue Fault, Charnock Fault, and the Newport-Inglewood Fault (CGS 2023).

### *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. Liquefaction typically occurs in areas with depths to groundwater of less than 50 feet. Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move downslope on a liquefied soil layer. 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. Several liquefaction hazard zones have been identified in the Planning Area, most are associated with the Marina del Rey and Ballona Wetlands (USGS 2023).

### *Landslides*

The potential for landslides (earthquake-induced or non-earthquake-induced) is greatest in hilly areas with steep slopes and bedrock or soils that are prone to mass movement. Landslides occur as falls, topples, spreads, slides, or flows. Falls are masses of soil or rock that dislodge from steep slopes and free-fall, bounce, or roll downslope. Topples move by the forward pivoting of a mass around an axis below the displaced mass. Lateral spreads occur in association with liquefaction, as described previously. Slides displace masses of material along one or more discrete planes. In rotational sliding, the slide plane is curved and the mass rotates backwards around an axis parallel to the slope, whereas in transitional sliding the failure surface is more or less planar and the mass moves parallel to the ground surface. Flows mobilize as a deforming, viscous mass without a discrete failure plane. More than one form of movement may occur during a failure, in which case the movement is classified as complex if movements occur sequentially and composite if they do not occur sequentially. Several landslide hazard zones have been identified, most of which lie in hilly areas such as the Santa Monica Mountains and Baldwin Hills, of which a portion lies in the Ladera Heights, Park View, and Windsor Hills communities (USGS 2023).

### *Regional Subsidence*

Land subsidence is a settling or sudden sinking of a geological surface due to subsurface movement of earth materials. The principal causes of subsidence in California are aquifer-system compaction, drainage and decomposition of organic soils, and oil and gas extraction. Effects of land subsidence include damage to buildings and infrastructure such as roads and canals, increased flood risk in low-lying areas, and lasting damage to groundwater aquifers and aquatic ecosystems. Based on a review of a USGS subsidence map, the Planning Area is not in an area of regional ground subsidence (USGS 2021).

### *Expansive Soil*

Expansive soils are those in which soils with high clay content are prone to expansion when wet and contraction when dry, known as "shrink-swell," which can result in damage to building foundations, pavement, and underground utilities. These soils can disrupt supply lines (i.e., roads, power lines, railways, and bridges) and damage structures. Patios, driveways, and walkways may also crack and heave as the underlying expansive soils become wet and swell. Clay-rich, expansive soils are common and located throughout the Planning Area (County of Los Angeles 2021).

## Paleontological Setting and Resources

Paleontological resources are the fossilized remains of plants and animals, including vertebrates (animals with backbones; mammals, birds, fish, etc.), invertebrates (animals without backbones; starfish, clams, coral, etc.), and microscopic plants and animals (microfossils), and can include mineralized body parts, body impressions, or footprints and burrows. They are valuable, nonrenewable, scientific resources used to document the

existence of extinct life forms and to reconstruct the environments in which they lived. Paleontological sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. To assess the significance of a geologic unit to contain paleontological resources (i.e., paleontological potential/sensitivity), paleontologists have adopted the standards set forth by the Society of Vertebrate Paleontology (SVP) (2010). The SVP defines four categories of paleontological sensitivity (potential) for rock units: high, low, undetermined, and no potential. For geologic units with high potential, full-time monitoring is generally required during all ground disturbance. For geologic units with low to high potential, monitoring is generally required at certain depths. For geologic units with low or no potential, monitoring is not generally required. For geologic units with undetermined potential, monitoring is generally required at the initiation of excavation until potential is further assessed. The presence of Holocene alluvium on the surface in the Planning Area, including the 12 Opportunity Sites and Inglewood Oil Field, has been assigned a low-sensitivity criteria for producing fossils (ECORP 2024).

## 5.7.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

G-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)
- ii) Strong seismic ground shaking.
- iii) Seismic-related ground failure, including liquefaction.
- iv) Landslides.

G-2 Result in substantial soil erosion or the loss of topsoil.

G-3 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.

G-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

G-5 Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

G-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

## 5.7.3 Environmental Impacts

### 5.7.3.1 METHODOLOGY

The analysis of geologic and soil resources in this section is based on a review of the project description and available literature from State and local agencies as well as a record search with the Los Angeles County Natural History Museum in Los Angeles (see Appendix F). The following analysis evaluates the Project's potential impacts with regard to geology and soils, taking into account State-mandated construction methods, as specified in California Safety and Health Administration regulations (Title 8 of the CCR), the Los Angeles County Building Code (Title 26), and the CBC (24 CCR, Part 2).

### 5.7.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 9**: A safe built environment and infrastructure.

- **Policy LU 9.1:** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).

### 5.7.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.7-1 (i): 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 fault? (Refer to Division of Mines and Geology Special Publication 42.) [Threshold G-1(i)]**

**Less Than Significant Impact.** The WSAP would be a long-range policy document for unincorporated areas of the Planning Area that does not propose the development of specific habitable structures that could be directly impacted by known Alquist-Priolo Earthquake Fault Zones. There are four active faults that run through the Planning Area: the Hollywood Fault, Overland Avenue Fault, Charnock Fault, and Newport-Inglewood Fault. Construction of any new structures, and improvements to certain existing structures is subject to the standards and requirements included in the most current version of the CBC and the County of Los Angeles (County) Building Code (which is derived from the CBC). All new future development in the Planning Area would be constructed in accordance with all applicable State and County laws (e.g., Alquist-Priolo Earthquake Fault Zoning Act, CBC, and the County Building Code), which would require project-specific geotechnical review prior to issuance of grading permits. This review would identify and address potential project-specific geotechnical hazards, including fault rupture. Compliance with requirements of the CBC for structural safety would reduce fault hazards to less than significant. Policy LU 9.1 would ensure that any new development would be designed to protect structures and occupants from natural hazards, including those

related to earthquake faults. With compliance with existing regulations, including compliance with the State and County building codes, future development under the WSAP would not cause or exacerbate the potential for fault rupture to occur. Therefore, the proposed Project 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 a result, impacts would be less than significant.

**Impact 5.7-1 (ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? [Threshold G-1(ii)]**

**Less Than Significant Impact.** All of the Planning Area is in a seismically active part of Southern California. The proposed Project is a policy document that does not propose any new development but could potentially result in the future construction of new buildings. Conformance with the CBC and Los Angeles County Building Code would reduce impacts to new development associated with strong seismically induced ground shaking to the maximum extent practicable, under currently accepted engineering practices. The CBC sets forth structural design parameters for buildings to withstand seismic shaking without substantial structural damage. Section 1803 of the CBC requires preparation of a site-specific geotechnical investigation to assess the degree of potential seismic hazards and recommend appropriate design/mitigation measures. The Los Angeles County Building Code implements the 2022 CBC and contains standards and regulations relating to seismic safety and construction standards for building foundations. Conformance with the County Building Code and the CBC, as required by State law, would minimize the potential for damage of new structures and their foundations. Policy LU 9.1 would also ensure that any new development would be designed to protect structures and occupants from natural hazards. Site-specific geotechnical investigation that would calculate the seismic design parameters to reduce hazards to people and structures arising from ground shaking would be required for future development. As a result, the WSAP would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant.

**Impact 5.7-1 (iii): 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 and lateral spreading? [Threshold G-1(iii)]**

**Less Than Significant Impact.** The proposed Project is a policy document and does not propose any new development. Several liquefaction hazard zones have been identified in the Planning Area, which are primarily associated with the Marina del Rey and Ballona Wetlands. Conformance with the CBC and the County Building Code requirements would reduce impacts associated with seismic-related ground failure and standard geotechnical engineering procedures, soil testing, and proper design can identify and mitigate liquefiable soils. By using the most up-to-date standards for future development, potential damage related to liquefaction and lateral spreading would be minimized such that less-than-significant impacts would occur. Further, Policy S 1.3 of the County's General Plan Safety Element requires developments to mitigate geotechnical hazards, such as soil instability and landslides, in Hillside Management Areas through siting and development standards. In addition, given the nature of the residential, commercial, and industrial uses, future development would not cause or exacerbate the potential for seismically related ground failure to occur. As a result, the WSAP would

not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure. Impacts would be less than significant.

**Impact 5.7-1 (iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? [Threshold G-1(iv)]**

**Less Than Significant Impact.** The potential for landslides (earthquake-induced or non-earthquake induced) is greatest in hilly areas with steep slopes and bedrock or soils that are prone to mass movement. Landslides occur as falls, topples, spreads, slides, or flows. Several landslide hazard zones have been identified, most of which lie in hilly areas such as the Santa Monica Mountains and Baldwin Hills of which a portion lies in the Ladera Heights, Park View, and Windsor Hills communities. With respect to future redevelopment and/or new construction in residential areas on gently sloping topography, compliance with the CBC and County Building Code related to grading, including completion of a standard geotechnical investigation, would minimize the potential for slope instability to occur such that less-than-significant impacts would occur. In addition, new construction in HMAs would be subject to the County's HMA Ordinance and Hillside Design Guidelines, which implement the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design. Further, Policy S 1.3 of the County's General Plan Safety Element requires developments to mitigate geotechnical hazards, such as soil instability and landslides, in HMAs through siting and development standards. As a result, implementation of the WSAP would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts are considered less than significant.

**Impact 5.7-2: Would the project result in substantial soil erosion or the loss of topsoil? [Threshold G-2]**

**Less Than Significant Impact**. The Planning Area, and in particular those areas that are proposed for land use and zone changes (12 Opportunity Sites), are predominantly developed as urban land uses. Any future development may include excavation, grading, and other soil-disturbing activities that could result in soil erosion or loss of topsoil. For projects disturbing more than one 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. Compliance with the Construction General Permit and MS4 permit requirements would minimize impacts related to erosion and loss of topsoil during construction of specific developments completed under the WSAP, resulting in less-than-significant impacts. The Planning Area has little to no vacant land available for development, so any future development or redevelopment projects would generate little increase in runoff relative to the existing drainage system. Therefore, the chance of soil erosion and topsoil loss occurring during operation of new developments is low. As a result, the proposed Project would not result in substantial soil erosion or the loss of topsoil and impacts would be less than significant.

**Impact 5.7-3: Would the project be 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? [Threshold G-3]**

**Less Than Significant Impact**. As described previously, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction,

lateral spreading, collapse, or landslides. Development of future projects would be completed in conformance with the CBC and the County Building Code, which would minimize seismic- and slope stability-related impacts, under currently accepted engineering practices, such that impacts would be less than significant. Grading and construction would be completed in accordance with recommendations of a project-specific geotechnical report, which would mitigate any potential issues related to ground failure. In addition, the Planning Area is not characterized as being in an area of regional ground subsidence. Although future development completed as part of the WSAP may be on a geologic unit or soil that is unstable, compliance with current building codes would minimize any geologic impacts. In addition, future development sites would not become unstable as a result of the WSAP and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.

**Impact 5.7-4: Would the project be on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial risks to life or property? [Threshold G-4]**

**Less Than Significant Impact.** Future development in the Planning Area could occur on soil types that pose constraints to structural development. Expansive soils is one example in which soils with high clay content are prone to expansion and contraction, known as "shrink-swell," which can result in damage to building foundations, pavement, and underground utilities. These soils can disrupt supply lines (i.e., roads, power lines, railways, and bridges) and damage structures. Patios, driveways, and walkways may also crack and heave as the underlying expansive soils become wet and swell. Grading and construction would be completed in accordance with recommendations of a project-specific geotechnical report during building plan check review, which would mitigate any potential issue related to expansive soils. Therefore, although the proposed Project could potentially result in future development on properties with soil constraints, such as expansive soils, with incorporation of standard geotechnical engineering, in compliance with the County Building Code and CBC, the WSAP would not create substantial direct or indirect risks to life or property and impacts would be less than significant.

**Impact 5.7-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? [Threshold G-5]**

**Less Than Significant Impact.** Future developments pursuant to implementation of the proposed Project would similarly include connections to sanitary sewers and would not use on-site or alternative wastewater treatment systems. If home and business property owners want to install or replace an on-site wastewater treatment system (OWTS), they must submit an application, along with the required documents listed on the application, to go through the OWTS review process. Since this procedure would be required prior to the construction of any and all septic tanks and alternative wastewater disposal systems, all future projects would be subject to the applicable State and County requirements. Compliance with the applicable State and local requirements would ensure that impacts would be less than significant.

**Impact 5.7-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? [Threshold G-6]**

**Less Than Significant Impact with Mitigation Incorporated.** The presence of Holocene alluvium on the surface in the Planning Area has been assigned a low-sensitivity criteria for producing fossils. However, due to the presence of Pleistocene alluvial deposits near the surface and/or beneath the ground surface at certain portions of the Planning Area, there is the potential for future projects requiring ground-disturbing activities into such native soils result in potentially significant impacts. Implementation of Mitigation Measures GEO-1 through GEO-3 would require future project applicants to retain a qualified paleontologist to assess sensitivity and make recommendations regarding potential monitoring, construction worker sensitivity training, and treatment of any recovered sensitive resources. Compliance with these mitigation measures would ensure impacts to paleontological resources are less than significant.

## 5.7.4 Cumulative Impacts

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable probable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself). The cumulative geographic study area used to assess potential cumulative geology and soils impacts include the County of Los Angeles. However, geology and soils impacts are generally site-specific and do not combine with other projects resulting in a cumulative impact.

**Impact 5.7-7: Would the Project, when combined with other past, present, or reasonably foreseeable projects directly or indirectly cause a potential substantial adverse effect, including risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking, (iii) seismic-related ground failure, or (iv) landslides?**

**Less Than Significant Impact.** Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards. The majority of impacts from geologic hazards, such as surface fault rupture, seismically induced ground shaking, liquefaction, lateral spreading, landslides, subsidence, and expansive soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact.

Future subsequent projects in unincorporated county areas would be required to adhere to required building engineering design, as dictated by the County's HMA Ordinance (if applicable). All future projects in the County would be required to comply with the most recent version of the CBC to ensure the safety of building occupants and avoid a cumulative geologic hazard. Additionally, projects would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards present on each individual cumulative project site as needed. Therefore, a cumulative impact related to site-specific geologic hazards would not occur and geologic impacts resulting from implementation of the proposed Project would not be cumulatively considerable.

**Impact 5.7-8: Would the Project, when combined with other past, present, or reasonably foreseeable projects result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** In the absence of proper erosion control features during construction, erosion-related impacts associated with other closely related past, present, and reasonably foreseeable probable future projects could potentially combine to create cumulative significant impacts. Soil erosion can lead to downstream water quality impacts, which if combined could be cumulatively considerable. However, for cumulative projects disturbing more than one 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. Cumulative project sites that disturb less than one 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. Therefore, impacts related to soil erosion and loss of topsoil as a result of the implementation of the proposed Project would have a less than significant cumulative impact.

**Impact 5.7-9: Would the Project, when combined with other past, present, or reasonably foreseeable projects be on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

**Less Than Significant Impact.** As discussed under Threshold 5.7-7, potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards. The majority of impacts from geologic hazards, including unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. Therefore, impacts related to unstable soils as a result of the implementation of the proposed Project would have a less than significant cumulative impact.

**Impact 5.7-10: Would the Project, when combined with other past, present, or reasonably foreseeable projects be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial risks to life or property?**

**Less Than Significant Impact.** As discussed under Threshold 5.7-7, potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards. The majority of impacts from geologic hazards, including expansive soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. Therefore, impacts related to expansive soil as a result of the implementation of the proposed Project would have a less than significant cumulative impact.

**Impact 5.7-11: Would the Project, when combined with other past, present, or reasonably foreseeable projects have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**Less Than Significant Impact.** Similar to the proposed Project, other closely related past, present, and reasonably foreseeable probable future projects include connections to the sanitary sewer system and would not use on-site or alternative wastewater treatment systems. Any installation of alternative water systems would be subject to the applicable State and County requirements prior to construction. Therefore, impacts related to septic and alternative sanitary sewer or wastewater systems as a result of the implementation of the proposed Project would have a less than significant cumulative impact.

**Impact 5.7-12: Would the Project, when combined with other past, present, or reasonably foreseeable projects directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact with Mitigation Incorporated.** The County has a rich paleontological resources record. Past, present, and reasonably foreseeable future projects have affected and can be expected to continue to affect the significance of unique paleontological resources or sites or unique geologic features in the unincorporated areas, including as a result of disturbance to unanticipated discoveries of such resources during ground-disturbing activities at fossil-bearing depths. Projects facilitated by the WSAP could potentially contribute a significant incremental contribution to this significant cumulative impact that could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) with the implementation of Mitigation Measures GEO-1 through GEO-3. With the implementation of these mitigation measures, project-specific, incremental contribution, taken into consideration with the cumulative projects' impacts to unique paleontological resources or sites or unique geologic features over the span of the WSAP would not be cumulatively considerable because they would require identification and treatment of unique paleontological resources or sites or unique geologic features and thereby avoid or reduce significant impacts. With the implementation of these mitigation measures, a less than significant cumulative impact to unique paleontological resources or sites or unique geologic features would result.

## 5.7.5 Level of Significance Before Mitigation

Upon compliance with County ordinances, development standards, and WSAP goals and policies, impacts would be less than significant.

Without mitigation, these impacts would be **potentially significant**:

- **Impact 5.7-6:** Direct or indirect impacts may destroy a unique paleontological resource or site or unique geologic feature.
- **Impact 5.7-12:** Direct or indirect cumulative impacts may destroy a unique paleontological resource or site or unique geologic feature.

## 5.7.6 Mitigation Measures

### Impact 5.7-6

GEO-1 For projects facilitated by the WSAP that involve ground disturbance, the project proponent shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to prepare a paleontological resources assessment report prior to the start of construction activities. The report shall include methods and results of the paleontological resources assessment, monitoring requirements (including depths, frequency, and reporting), and maps that outline where monitoring is required. Monitoring shall follow SVP Guidelines: no monitoring of ground-disturbing activities in units of Low Sensitivity or No Potential; monitoring of all ground-disturbing activities (with depths specified) in units of Low to High Significance; and at all depths in units of High Significance unless the Qualified Paleontologist's report identifies previous disturbances or the use of construction methods that do not warrant monitoring; and monitoring at the initiation of excavation in units of Undetermined Significance. The report also shall stipulate whether screen washing is necessary to recover small specimens following SVP Guidelines and determine whether unique geologic features are present on-site. If monitoring is conducted, then the Qualified Paleontologist shall prepare a final report summarizing monitoring results and submit it to the project proponent and the County.

GEO-2 Prior to the start of ground-disturbing activities for projects facilitated by the WSAP with potentially significant impacts on paleontological resources, the Qualified Paleontologist or its designee shall conduct construction worker paleontological resources sensitivity training (or may be provided via digital recording) for all construction workers. Construction workers shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The project proponent shall ensure that construction workers are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

GEO-3 If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area determined by the paleontological monitor shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading/excavation contractor shall assist, where feasible, in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, nonprofit institution with a

research interest in the material and with retrievable storage, such as the County Natural History Museum, if such an institution agrees to accept the fossils. Accompanying notes, maps, and photographs shall also be filed at the repository. If no institution accepts the fossil collection, it may be donated to a local school or other interested organization in the area for educational purposes. If construction workers discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure. Any salvage reports resulting from implementation of this measure shall be filed with the County Natural History Museum.

## 5.7.7 Level of Significance After Mitigation

The mitigation measures would reduce potential impacts associated with paleontological resources to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to geology and soils have been identified.

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# 5. Environmental Analysis
## GEOLOGY AND SOILS

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# 5.8 GREENHOUSE GAS EMISSIONS

This section of the Draft Program Environmental Impact Report (PEIR) evaluates the potential for implementation of the Westside Area Plan (WSAP or Project) to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). GHG emissions modeling was conducted using the California Emissions Estimator Model (CalEEMod), version 2022.1, and model outputs are in Appendix D of this PEIR. Cumulative impacts related to GHG emissions are based on the regional boundaries of the South Coast Air Basin (SoCAB).

During the scoping period for the Draft PEIR, written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, included in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.8.1 Environmental Setting

### 5.8.1.1 TERMINOLOGY

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide ($CO_2$) over a given period of time (20, 100, and 500 years). $CO_2$ has a GWP of 1.
- **Carbon-dioxide equivalent ($CO_2e$).** The standard unit to measure the amount of greenhouse gases in terms of the amount of $CO_2$ that would cause the same amount of warming. $CO_2e$ is based on the GWP ratios between the various GHGs relative to $CO_2$.
- **$MTCO_2e$.** Metric ton of $CO_2e$.
- **$MMTCO_2e$.** Million metric tons of $CO_2e$.

#### 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 in 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 2001).[1,2] The major GHGs applicable to the Project are briefly described.

- **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 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.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 5.8-1, *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 Fourth Assessment Report (AR4) GWP values for $CH_4$, a project that generates 10 MT of $CH_4$ would be equivalent to 250 MT of $CO_2$.[3]

**Table 5.8-1 GHG Emissions and Their Relative Global Warming Potential Compared to $CO_2$**

| GHGs | Second Assessment Report Global Warming Potential Relative to $CO_2$[1] | Fourth Assessment Report Global Warming Potential Relative to $CO_2$[1] | Fifth Assessment Report Global Warming Potential Relative to $CO_2$[1] |
|---|---|---|---|
| Carbon Dioxide ($CO_2$) | 1 | 1 | 1 |
| Methane ($CH_4$)[2] | 21 | 25 | 28 |
| Nitrous Oxide ($N_2O$) | 310 | 298 | 265 |

Source: IPCC 1995, 2007, 2013.
Notes: The IPCC published updated GWP values in its Fifth Assessment Report (AR5) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of $CO_2$. However, GWP values identified in AR4 are used by South Coast AQMD to maintain consistency in statewide GHG emissions modeling. In addition, the 2017 Scoping Plan Update was based on the GWP values in AR4.
1 Based on 100-year time horizon of the GWP of the air pollutant compared to $CO_2$.
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 $CO_2$ is not included.

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.

2 Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017a). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

3 The global warming potential of a GHG is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

## 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 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 the 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. 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 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 the frequency of warm spells and 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).

## 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 (CCCC 2012). The years from 2014 through 2016 showed unprecedented temperatures, with 2014 being the warmest (OEHHA 2018). 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 by 5.8 to 8.8°F, depending on emissions levels (CNRA 2019).

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) advanced 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). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive three years from 2020 to 2022 (NOAA 2023). According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, boards, and departments, led by 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 (see Table 5.8-1), 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 shown in Table 5.8-2, *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.

**Table 5.8-2 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 pests and pathogens<br>Shifting vegetation and species distribution<br>Altered timing of migration and mating habits<br>Loss of sensitive or slow-moving species |

**Table 5.8-2 Summary of GHG Emissions Risks to California**

| Impact Category | Potential Risk |
|---|---|
| Energy Demand Impacts | Potential reduction in hydropower<br>Increased energy demand |

Sources: CEC 2006; CEC 2009; CCCC 2012; CNRA 2014.

Specific climate change impacts that could affect the state of California 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 simultaneous heat waves 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 will need to be produced to make up for both the loss in capacity and the growing demand (CCCC 2012).

### 5.8.1.2 REGULATORY BACKGROUND

Federal, state, and local laws, regulations, plans, or guidelines related to greenhouse gas emissions that are applicable to the Project are summarized in this section.

#### Federal

##### *United States Environmental Protection Agency*

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 do not impose any emission reduction requirements, but allow 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 (USEPA 2009).

To regulate GHGs from passenger vehicles, EPA was required to issue an endangerment finding. The finding identified 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. The first three are applicable to the Project's GHG emissions inventory because they constitute the majority of GHG emissions, and according to guidance by the South Coast Air Quality Management District (South Coast AQMD), are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

##### *US Mandatory Reporting Rule for GHGs (2009)*

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 $MTCO_2e$ or more per year are required to submit an annual report.

##### *Update to Corporate Average Fuel Economy Standards (2021 to 2026)*

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the EPA finalized an updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards established in 2012. Overall, SAFE requires a fleet average of 40.4 mpg for model year 2026 vehicles (85 Federal Register 24174 (April 30, 2020)).

On December 21, 2021, under direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the National Highway Traffic Safety Administration finalized new fuel standards in response to

EO 13990. Fuel efficiency under the standards proposed will increase 8 percent annually for model years 2024 to 2025 and 10 percent annual for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase relative to model year 2021 (NHTSA 2022).

## State

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in EO S-03-05 and EO B-30-15, EO B-55-18, Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and SB 375.

### *Executive Order S-03-05*

EO S-03-05 was signed June 1, 2005, and set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

### *Assembly Bill 32, the Global Warming Solutions Act (2006)*

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 EO S-03-05. CARB prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

### *Executive Order B-30-15*

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed 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 EO 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 SB 32 and AB 197 into law, making the EO B-30-15 goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

### *Executive Order B-55-18*

Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and

recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

### *Assembly Bill 1279*

On August 31, 2022, the California Legislature passed AB 1279, which requires California to achieve net-zero GHG emissions no later than 2045 and to achieve and maintain negative GHG emissions thereafter. Additionally, AB 1279 also establishes a GHG emissions reduction goal of 85 percent below 1990 levels by 2045. CARB will be required to update the scoping plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

#### *2022 Climate Change Scoping Plan*

CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the State's anthropogenic GHG emissions (CARB 2022). The Scoping Plan provides updates to the previously adopted 2017 Scoping Plan and addresses the carbon neutrality goals of EO B-55-18 (discussed below) and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. The 2022 Scoping Plan updates the target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time.

The path forward was informed by the recent Sixth Assessment Report (AR6) of the IPCC and the measures would achieve 85 percent below 1990 levels by 2045 in accordance AB 1279. CARB's 2022 Scoping Plan identifies strategies as shown in Table 5.8-3, *Priority Strategies for Local Government Climate Action Plans*, which would be most impactful at the local level for ensuring substantial process toward the State's carbon neutrality goals.

**Table 5.8-3 Priority Strategies for Local Government Climate Action Plans**

| Priority Area | Priority Strategies |
|---|---|
| Transportation Electrification | Convert local government fleets to zero-emission vehicles (ZEV) and provide EV charging at public sites. |
| | Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans). |
| VMT Reduction | Reduce or eliminate minimum parking standards. |
| | Implement Complete Streets policies and investments, consistent with general plan circulation element requirements. |
| | Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, micro transit, etc. |
| | Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking |
| | Implement parking pricing or transportation demand management pricing strategies. |
| | Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood). |
| | Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements) |
| Building Decarbonization | Adopt all-electric new construction reach codes for residential and commercial uses. |
| | Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers). |
| | Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances. |
| | Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing). |
| | Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings). |

Source: CARB 2022.

Based on Appendix D of the 2022 Scoping Plan, for residential and mixed-use development projects, CARB recommends first demonstrating that these land use development projects are aligned with State climate goals based on the attributes of land use development that reduce operational GHG emissions while advancing fair housing. Attributes that accommodate growth in a manner consistent with the GHG and equity goals of SB 32 have all the following attributes:

- Transportation Electrification
  - Provide electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code at the time of project approval.

- Vehicle Miles Traveled (VMT) Reduction

- Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
- Does not result in the loss or conversion of the State's natural and working lands.
- Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre), or is in proximity to existing transit stops (within a half mile), or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS).
- Reduces parking requirements by:
  - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or
  - Providing residential parking supply at a ratio of <1 parking space per dwelling unit; or
  - For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
- At least 20 percent of the units are affordable to lower-income residents.
- Result in no net loss of existing affordable units.

- Building Decarbonization
  - Uses all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking (CARB 2022).

### *Senate Bill 375*

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

#### *2017 Update to the SB 375 Targets*

CARB is required to update the targets for the MPOs every eight years. CARB adopted revised SB 375 targets for the MPOs in March 2018 that became effective in October 2018. All SCSs adopted after October 1, 2018,

are subject to these new targets. CARB's updated SB 375 targets for the SCAG region were an 8 percent per capita GHG reduction in 2020 from 2005 levels (unchanged from the 2010 target) and a 19 percent per capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (CARB 2018).

The targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update (for SB 32), while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of "percent per capita" reductions in GHG emissions from automobiles and light trucks relative to 2005; this excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies, such as statewide road user pricing. The proposed targets call for greater per-capita GHG emission reductions from SB 375 than are currently in place, which for 2035 translate into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs to achieve the SB 375 targets. CARB foresees that the additional GHG emissions reductions in 2035 may be achieved from land use changes, transportation investment, and technology strategies (CARB 2018).

### *Transportation Sector Specific Regulations*

#### *Assembly Bill 1493*

California vehicle GHG emission standards were enacted under AB 1493 (Health and Safety Code sections 42823 and 43018.5) (also known as the Pavley I standards). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) manufactured in and after 2009 and was 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 years 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards under "Federal," above). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combined the control of smog, soot, and GHGs with requirements for greater numbers of zero-emissions (ZE) vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent less GHG emissions and 75 percent less smog-forming emissions.

#### *Executive Order S-01-07*

On January 18, 2007, the state set a new low-carbon fuel standard (LCFS) for transportation fuels sold in the state. EO S-01-07 mandated the following actions: (1) establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) adopt an LCFS for transportation fuels in California. EO S-01-07 set a declining standard for GHG emissions measured in grams of $CO_2e$ per unit of fuel energy sold in California. The LCFS required 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 applied to refiners, blenders, producers, and importers of transportation fuels and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the "fuel cycle." In 2018, CARB amended the LCFS to strengthen the carbon intensity benchmarks through 2030 in line with California's 2030 GHG emissions reduction target enacted through SB 32.

#### *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 ZE vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). EO B-16-2012 also directed the number of ZE 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 ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

#### *Executive Order N-79-20*

On September 23, 2020, Governor Newsom signed EO N-79-20, which sets a course to end sales of internal combustion passenger vehicles. EO N-79-20 set a statewide goal that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for truck are that 100 percent of drayage trucks be ZE by 2035 and 100 percent of medium- and heavy-duty vehicles in the state be ZE by 2045, where feasible. EO N-79-20 also identifies a goal for the state to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible.

### *Renewables Portfolio: Carbon Neutrality Regulations*

#### *Senate Bills 1078, 107, and X1-2, and Executive Order S-14-08*

The state of California has adopted regulations that establishes the Renewables Portfolio Standard (RPS) to increase the proportion of electricity from renewable sources. A major component of California's Renewable Energy Program is the renewable portfolio standard (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 to reach at least 20 percent by December 30, 2010. EO S-14-08 was signed in November 2008, which expanded the state's RPS to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

#### *Senate Bill 350*

SB 350 (de Leon) was signed into law in September 2015 and establishes tiered increases to the RPS—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.

#### *Senate Bill 100*

On September 10, 2018, Governor Brown signed SB 100, which increased the RPS to require 50 percent renewable resources by December 31, 2026, and 60 percent by December 31, 2030, while requiring retail sellers and local publicly owned electric utilities to meet interim targets of 44 percent of retail sales by December 31, 2024, and 52 percent by December 31, 2027. Furthermore, the bill establishes an overall state policy that eligible

renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

## Energy Efficiency Regulations

### *California Building Code: Building Energy Efficiency Standards*

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (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 August 11, 2021, the CEC adopted the 2022 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission in December 2021. The 2022 standards became effective January 1, 2023. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. The new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021).

### *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. The mandatory provisions of CALGreen became effective January 1, 2011, and were last updated in 2022. The 2022 CALGreen standards became effective January 1, 2023.

### *2006 Appliance Efficiency Regulations*

The 2006 Appliance Efficiency Regulations (20 CCR secs. 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 non–federally 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 Diversion Regulations

### *AB 939: Integrated Waste Management Act of 1989*

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code secs. 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 required 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*

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. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

#### *AB 1327*

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code secs. 42900 et seq.) required 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.

#### *AB 1826*

In October 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 with 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 with food waste.

### *Water Efficiency Regulations*

#### *SBX7-7*

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 required 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.

#### *AB 1881: Water Conservation in Landscaping Act*

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also required 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.

### *Short-Lived Climate Pollutant Reduction Strategy*

#### *Senate Bill 1383*

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and $CH_4$. Black carbon is the light-absorbing component of fine particulate matter produced during the incomplete combustion of fuels. SB 1383 required the state board, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills.

On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the state's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (e.g., charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use (CARB 2017a). In-use on-road rules were expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020. South Coast AQMD is one of the air districts that requires air pollution control technologies for chain-driven broilers, which reduces particulate emissions from these charbroilers by over 80 percent (CARB 2017a). Additionally, South Coast AQMD Rule 445 limits installation of new fireplaces in the South Coast Air Basin.

## Regional

### *SCAG's 2024-2050 RTP/SCS*

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

## Local

### *Los Angeles County Code*

The Los Angeles County Code (LACC) is a compilation of County ordinances of a general nature that have been codified, chaptered, and indexed. Pursuant to the LACC, the purpose of Section 22.44.1260, Grading, is to ensure that new development minimizes the visual and environmental resource impacts of grading and landform alteration. As specified in part therein, the temporary storage of construction materials for public projects shall be managed using the most current best management practices to eliminate erosion into adjacent drainage courses, to protect air and water quality, and to minimize the spread of invasive plant species (Section 22.33.1260[M]).

As specified in Section 101.2 in Title 31, Green Building Standards Code, of the LACC:

> The purpose of this [Green Building Standards] Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in the following categories: (1) Planning and design. (2) Energy efficiency. (3) Water efficiency and conservation. (4) Material conservation and resource efficiency. (5) Environmental air quality.

### *Our County Los Angeles Countywide Sustainability Plan*

On August 6, 2019, the County Board of Supervisors (Board) adopted "OurCounty: The Los Angeles Countywide Sustainability Plan," which provides a framework to address sustainability within the County. OurCounty is focused on the incorporation of sustainability in 12 goals, 37 strategies, and 159 actions that include development of healthy community environments, buildings and infrastructure, land use, green economy, ecosystems, recreational opportunities, fossil-fuel-free energy, transportation systems, production and consumption of resources, food systems, governmental transparency, and funding partnerships.

Although OurCounty has not been codified in the LACC, a number of its goals, strategies, and actions promote the preparation and future adoption of implementing ordinances designed to achieve OurCounty targets. The OurCounty goals are as follows:

**Goal 1:** Resilient and healthy community environments where residents thrive in place. The County will protect vulnerable communities from pollution, reduce health and economic inequalities, ensure access to safe, clean, and affordable water, and support more resilient and inclusive communities.

**Goal 2:** Buildings and infrastructure that support human health and resilience. Old and new buildings and infrastructure will utilize more efficient technologies and practices that reduce resource use, improve health, and increase resilience.

**Goal 3:** Equitable and sustainable land use and development without displacement. Utilize policy tools, such as anti-displacement measures, so existing community members can remain in and strengthen their

neighborhoods and networks while accepting new residents through more compact, mixed-use development. Pursue outcomes that are inclusive, safe, healthy, accessible, and transit oriented.

**Goal 4:** A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy. Support the growth of green economy sectors through procurement practices, land use authority, and various economic and workforce development incentives.

**Goal 5:** Thriving ecosystems, habitats, and biodiversity. Ensure that our ecosystems, including urban habitats, thrive even as our region becomes increasingly urbanized through careful planning.

**Goal 6:** Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities. Make parks and public lands more accessible and inclusive and manage them so that all residents may enjoy their benefits.

**Goal 7:** A fossil fuel-free LA County. Move towards a zero-carbon energy system that reduces GHG emissions by eliminating fossil fuel production in the County. By addressing sources of pollution, air will be cleaner for the residents and the imminent dangers from the magnitude of climate change will be limited.

**Goal 8:** A convenient, safe, clean, transportation system that enhances mobility and quality of life while reducing car dependency. Provide a modern transportation system for all ages and abilities to access reliable, safe, affordable, and varied mobility choices that reduce pollution. Develop programs that focus on reducing the number of vehicle miles travelled, including transit systems, walking, biking, e-scooters, and zero-emission car-share services.

**Goal 9:** Sustainable production and consumption of resources. Improve our ability to promote integrative and collaborative solutions at the local and regional levels to effectively manage the County's waste, water, energy, and material resources into the future.

**Goal 10:** A sustainable and just food system that enhances access to affordable, local, and healthy food. Improve access to healthy food within County boundaries while optimizing purchasing power and business services to make food production more sustainable through leveraging of capital assets, public services, and regulatory authority.

**Goal 11:** Inclusive, transparent, and accountable governance that encourages participation in sustainability efforts, especially by disempowered communities. Build stronger communities and better-informed policy and programs by creating a more inclusive and accountable governance structure. This will ensure equity in sustainability policies and programs by having diverse representation in development, implementation, and management.

**Goal 12:** A commitment to realize OurCounty sustainability goals through creative, equitable, and coordinated funding and partnerships. Work with partners across the public, private, and nonprofit sectors for a more sustainable future through funding opportunities and leveraging of purchasing power.

### *2045 Community Climate Action Plan*

The 2045 Los Angeles County Community Climate Action Plan (2045 CAP), which is planned for adoption by the Board in June 2024, identifies strategies, measures, and actions to reduce GHG emissions from community activities (Los Angeles 2024). The 2045 CAP is LA County's path to meet the goals of the Paris Agreement and achieve carbon neutrality for unincorporated areas of the county. It builds on previous climate action work from the County Community Climate Action Plan 2020 (2020 CCAP) and includes a GHG emissions inventory from community-wide activities in unincorporated County in 2018, along with a baseline inventory for 2015. The 2045 CAP also includes projections of future emissions for 2030, 2035, and 2045 as well as targets to reduce GHG emissions by 40 percent below 2015 levels by 2030 and 50 percent below 2015 levels by 2035. In addition to these targets, the 2045 CAP provides climate strategies, measures, and actions to reduce GHG emissions along with implementation and monitoring measures to ensure successful climate action.

### *Los Angeles County Green Building Standards Code (Title 31)*

In 2019, the Board adopted the County Green Building Standards Code (LACC Title 31) in response to the mandates in the 2019 CALGreen Code. Title 31 became effective on January 1, 2020. "Green Building and Drought Tolerant Landscaping" requirements, originally assigned to Title 22, Planning and Zoning Code, are now in Title 31. The purpose of Title 31 is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts that have a reduced negative impact or positive environmental impact and that encourage sustainable construction practices in planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental air quality. Notably, Title 31 requires nonresidential buildings that are equal to or greater than 25,000 square feet to comply with the CALGreen Code—specifically, Section A5.601.2.4, Voluntary Measures for CALGreen Tier 1. These measures include, but are not limited to, requirements for energy efficiency, parking for fuel-efficient vehicles, cool roofs, reduction of indoor potable water use, recycled content of construction materials, reduction in construction and demolition waste, and thermal insulation (Los Angeles County 2022b).

The County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. These requirements include: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydrozoning irrigation techniques shall be incorporated into the landscape design. Title 31 also establishes low-impact development (LID) standards for new construction that would conserve water, energy, and natural resources; divert waste from landfills; minimize impacts to existing infrastructure; and promote a healthier environment (Los Angeles County 2016).

### *Los Angeles County Roadmap to a Sustainable Waste Management Future*

On April 22, 2014, the Board adopted a motion directing the development of the "Roadmap to a Sustainable Waste Management Future" for the County's unincorporated communities. Accordingly, a working group was formed to collectively develop the Roadmap (Los Angeles County 2014). The intent of the Roadmap is to guide the County in implementing the four strategies identified by the working group, which are: (1) Programs

and Services, (2) Measuring Results, (3) Facilities and Infrastructure, and (4) Outreach and Education. By implementing these strategies, the Roadmap sets out to achieve 80 percent diversion from landfills by 2025; 90 percent by 2035; and 95 percent (or higher) by 2045. To accomplish these goals, the working group identified specific recommended initiatives, which will be expanded in detailed implementation plans.

### *Los Angeles County General Plan*

The County General Plan (General Plan) was adopted by the Board \ on October 6, 2015 and includes goals and policies to reduce GHG emissions and climate change impacts. Goals and policies that apply to the Project include:

#### *Land Use Element*

**Goal LU 11:** Development that utilize sustainable design techniques.

- **Policy LU 11.1.** Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.
- **Policy LU 11.2.** Support the design of developments that provide substantial tree canopy cover, and utilize 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.** Encourage subdivisions to utilize sustainable design practices, such as maximizing energy efficiency through lot configuration; preventing habitat fragmentation; promoting stormwater retention; promoting the localized production of energy; promoting water conservation and reuse; maximizing interconnectivity; and utilizing public transit.
- **Policy LU 11.8.** Encourage sustainable subdivisions that meet green neighborhood standards, such as Leadership in Energy and Environmental Design–Neighborhood Development (LEEDND).

#### *Mobility Element*

**Goal M 5:** Land use planning and transportation management that facilitates the use of transit.

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

**Goal M 7:** Transportation networks that minimizes negative impacts to the environment and communities.

- **Policy M 7.3.** Encourage the use of sustainable transportation facilities and infrastructure technologies, such as liquid and compressed natural gas, and hydrogen gas stations, ITS, and electric car plug-in ports.

*Air Quality Element*

**Goal AQ 3:** Implementation of plans and programs to address the impacts of climate change.

- **Policy AQ 3.1.** Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that the County reaches its climate change and greenhouse gas emission reduction goals.
- **Policy AQ 3.2.** Reduce energy consumption in County operations by 20 percent by 2015.
- **Policy AQ 3.3.** Reduce water consumption in County operations.
- **Policy AQ 3.4.** Participate in local, regional and state programs to reduce greenhouse gas emissions.
- **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.
- **Policy AQ 3.7. S**upport and expand urban forest programs within the unincorporated areas.
- **Policy AQ 3.8.** Develop, implement, and maintain countywide climate change adaptation strategies to ensure that the community and public services are resilient to climate change impacts.

*Conservation and Natural Resources Element*

**Goal C/NR 12:** Sustainable management of renewable and non-renewable energy resources.

- **Policy C/NR 12.1.** Encourage the production and use of renewable energy resources.
- **Policy C/NR 12.2.** Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.
- **Policy C/NR 12.3.** Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

### *Los Angeles County Code of Ordinances*

*Energy*

The County has adopted by reference Sections 102 through 119 of Chapter 1 of Title 26 as Title 31 Green Building Standards Code of the County Code. The Green Building Code increases energy and water efficiency and reduces waste generation. The Green Building Code has co-benefits of reducing criteria pollutant emissions through the increase in energy efficiencies, which reduces building energy demand and the combustion of natural gas in buildings.

*Water*

As part of state and regional efforts towards water conservation, Titles 11 and 12 of the LACC include requirements for water conservation and sustainability. The code requires recirculating water for water fountains and decorative water features and commercial conveyor carwashes and the use of recycled or approved nonpotable water for construction purposes. It is recommended that large, landscaped areas such as parks, cemeteries, golf courses, school grounds, and playing fields use irrigation systems with rain sensors that automatically shut off such systems during periods of rain or irrigation timers that automatically use information such as evapotranspiration sensors to set an efficient water schedule.

*Solid Waste*

Title 20 of the LACC contains provisions that implement source reduction and recycling programs and other measures to achieve per capita waste generation for disposal in accordance with state programs. The County requires all collectors operating under a collection franchise within the county to comply with applicable resource recovery and diversion programs to minimize solid waste disposal at landfills.

### 5.8.1.3 EXISTING CONDITIONS

#### California's GHG Sources and Relative Contribution

In 2021, the statewide GHG emissions inventory was updated for 2000 to 2019 emissions using the GWPs in IPCC's AR4 (IPCC 2013). Based on these GWPs, California produced 418.2 $MMTCO_2e$ GHG emissions in 2019. California's transportation sector was the single largest generator of GHG emissions, producing 39.7 percent of the state's total emissions. Industrial sector emissions made up 21.1 percent, and electric power generation made up 14.1 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (10.5 percent), agriculture and forestry (7.6 percent), high GWP (4.9 percent), and recycling and waste (2.1 percent) (CARB 2021).

Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2016, California statewide GHG emissions dropped below the AB 32 target for year 2020 of 431 $MMTCO_2e$ and have remained below this target. In 2019, emissions from routine GHG-emitting activities statewide were almost 13 $MMTCO_2e$ lower than the AB 32 target for year 2020. Per-capita GHG emissions in California have dropped from a 2001 peak of 14.0 $MTCO_2e$ per person to 10.5 $MTCO_2e$ per person in 2019, a 25 percent decrease.

Transportation emissions continued to decline in 2019 statewide as they had done in 2018, with even more substantial reductions due to a significant increase in renewable diesel. Since 2008, California's electricity sector has followed an overall downward trend in emissions. In 2019, solar power generation continued its rapid growth since 2013. Emissions from high-GWP gases comprised 4.9 percent of California's emissions in 2019. This continues the increasing trend as the gases replace ozone-depleting substances being phased out under the 1987 Montreal Protocol. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product) has declined 45 percent since the 2001 peak, though the state's gross domestic product grew 63 percent during this period (CARB 2021).

### Existing Unincorporated Los Angeles County Greenhouse Gas Emissions

The County recently released the 2045 Climate Action Plan, which prepared an updated baseline inventory for the unincorporated areas in the County for 2015[4] utilizing the inventory in the OurCounty Sustainability Plan but the EMFAC 2021 emission factors, and an inventory for the year 2018, given the availability in that year of the most recent complete data set of emissions-generating activity (LA County 2023). As shown in Table 5.8-4, *2015 and 2018 Unincorporated Los Angeles County Greenhouse Gas Emissions Inventory*, the 2045 CAP estimates the unincorporated county's baseline GHG emissions in the year 2018 to be approximately 5.2 $MMTCO_2e$. Of this, the largest contributing sector was transportation (52 percent); followed by stationary energy (33 percent); solid waste (9 percent); industrial processes and product use (5 percent); and agriculture, forestry, and other land uses (1 percent).

**Table 5.8-4 2015 and 2018 Unincorporated Los Angeles County Greenhouse Gas Inventory**

| Emissions Sector | 2015 Emissions ($MTCO_2e$) | 2018 Emissions ($MTCO_2e$) |
|---|---|---|
| Stationary energy | 1,908,637 | 1,689,809 |
| Transportation | 2,838,133 | 2,704,685 |
| Waste | 469,997 | 469,382 |
| Industrial processes and product use | 253,529 | 239,505 |
| Agriculture, forestry, and other land uses | 60,860 | 60,860 |
| **Total** | **5,531,155** | **5,173,240** |

Source: LA County 2023.
Note: $MTCO_2e$ = metric ton of carbon dioxide equivalent

### Existing Westside Area Plan Emissions

The existing land uses within the WSAP consist primarily of residential uses and involve a mix of commercial uses, educational uses, office and industrial spaces, and open space. These operations currently generate GHG emissions from vehicle trips, building energy use, water use, solid waste generation, and refrigerants.

## 5.8.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

[4] The 2015 GHG emissions inventory for the County is adapted from the Countywide 2015 Community GHG Inventory prepared for the OurCounty Sustainability Plan. Per the OurCounty Sustainability Plan, 2015 emissions from unincorporated Los Angeles County amounted to 6.5 million MTCO2e. The CAP accounts for emissions from all the sectors and subsectors reported in the OurCounty Sustainability Plan and includes additional community activities for unincorporated Los Angeles County (including off-road equipment, buses, and product use emissions, as detailed in Appendix A.1). However, due to updated activity data, emission factors, and modeling protocols, the 2045 CAP reports significantly lower emissions for 2015 (5.5 million MTCO2e). This decrease is attributable to declining emissions factors from the CARB EMissions FACtors 2021 (EMFAC2021) model, which outpace the increase in total vehicle miles traveled (VMT) as modeled with the Southern California Association of Governments' (SCAG's) 2016 Regional Travel Demand Model. OurCounty was modeled using EMFAC2017 emission factors.

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

GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

#### 5.8.2.1 CEQA GUIDELINES SECTION 15183.5

CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions, allows for lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level. Pursuant to CEQA Guidelines Section 15183.5, later project-specific environmental documents may tier from and/or incorporate by reference the GHG reduction plan so long as it includes the following plan elements:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated in the geographic area.
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates would collectively achieve the specified emissions level if implemented on a project-by-project basis.
- Establish a mechanism to monitor the plan's progress to achieving the level and to require amendment if the plan is not achieving specified levels.
- Be adopted in a public process following environmental review.

The 2045 CAP is an update to the County 2020 CCAP. The 2045 CAP was adopted in a public process following environmental review on April 16, 2024. The 2045 CAP provides updated GHG inventories based on the latest community protocols and GWPs. The 2045 provided emissions forecasts for 2030 and 2045 and established GHG emissions targets for years 2030 and 2045 consistent with SB 32 and AB 1279. The 2045 CAP identified State and local measures to reduce GHG emissions and quantified GHG reductions associated with these measures. The 2045 CAP identified that with implementation of the GHG reduction measures, the 2045 CAP provides a path to reduce the community's GHG emissions to achieve the SB 32 and AB 1279 GHG reduction targets for the unincorporated County.

Consequently, the 2045 CAP is a qualified GHG reduction plan. The Project ensures that the Planning Area accommodates growth identified in the County's Housing Element. Emissions associated with land uses in the Planning Area are included in the GHG forecast in the 2045 CAP. Thus, the Project's GHG emissions impacts are evaluated based on consistency with the 2045 CAP in accordance with CEQA Guidelines Section 15183.5.

#### 5.8.2.2 MASS EMISSIONS AND HEALTH EFFECTS

On December 24, 2018, in *Sierra Club et al. v. County of Fresno et al.* (Friant Ranch), the California Supreme Court determined that the EIR for the proposed Friant Ranch project failed to adequately analyze the project's air quality impacts on human health. The EIR prepared for the project, which involved a master planned retirement community in Fresno County, showed that project-related mass emissions would exceed the San Joaquin Valley Air Pollution Control District's regional significance thresholds. In its findings, the California Supreme Court affirmed the holding of the Court of Appeal that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criterion air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health.

In 2009, the EPA issued an endangerment finding for six GHGs—$CO_2$, $CH_4$, $N_2O$, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and $SF_6$—to regulate GHG emissions from passenger vehicles. The endangerment finding is based on evidence that shows an increase in mortality and morbidity associated with increases in average temperatures, which increase the likelihood of heat waves and ozone levels. The effects of climate change are identified in Table 5.8-2. Though identified effects such as sea level rise and increased extreme weather can indirectly impact human health, neither the EPA nor CARB has established ambient air quality standards for GHG emissions. The state's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change, and the state's GHG reduction goals and strategies are based on the path to reducing statewide cumulative GHGs as outlined in AB 32, SB 32, and EO S-03-05.

Because no single project is large enough to result in a measurable increase in global concentration of GHG emissions, climate change impacts of a project are considered on a cumulative basis. Without federal ambient air quality standards for GHG emissions and given the cumulative nature of GHG emissions and the South Coast AQMD's significance thresholds, which are tied to reducing the state's cumulative GHG emissions, it is not feasible at this time to connect the project's specific GHG emissions to the potential health impacts of climate change.

## 5.8.3 Environmental Impacts

With respect to GHG emissions, the State CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The State CEQA Guidelines note that a lead agency shall have the discretion to "quantify the GHG emissions from a project, and/or rely on a qualitative analysis or other performance-based standards" (14 CCR Section 15064.4[a]).

In its CEQA review of projects, the County has chosen to provide both a quantitative and qualitative GHG analysis for full disclosure. The methodology of analyzing the GHG emissions that may result from future development facilitated by adoption of the WSAP is conducted as described.

### 5.8.3.1 METHODOLOGY

This GHG evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely in conjunction with implementation of the Project. South Coast AQMD has published guidelines that are intended to provide local governments with guidance for analyzing and mitigating environmental impacts, and they were used in this analysis. The analysis in this section is based on future buildout of the Planning Area resulting from implementation of the WSAP, as modeled using CalEEMod version 2022.1 and EMFAC2021 version 1.0.3, for the following sectors:

- **Transportation.** The primary source of mobile GHG emissions is from the combustion of fuel (i.e., gasoline and diesel). Project-related on-road greenhouse gas emissions are based on year 2045 emission rates for the Project's buildout year. Transportation modeling is provided by Fehr and Peers using the SCAG 2016 RTP/SCS model for buildout in Year 2045. VMT is modeled using emissions factors in CARB's EMFAC2021 version 1.0.3 for the South Coast Air Basin, Los Angeles County subarea.

- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed net increase in dwelling units and retail square footage.

- **Energy.** The California Emissions Estimator Model (CalEEMod) version 2022.1 default energy (i.e., electricity and natural gas) rates for non-residential land uses are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019. CalEEMod default energy rates for residential land uses, which are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast and the 2019 Residential Appliance Saturation Survey (RASS), are used to quantify GHG emissions from energy use (i.e., natural gas and electricity). Use of the CalEEMod default energy rates results in conservative estimates compared to the recently adopted 2022 Building Energy Efficiency Standards because the commercial forecast is based on the energy demand per square foot of building space, land use subtype, and end use for the year 2019. It is anticipated new buildings under the 2022 Standards would generally result in lower electricity use. Portions of the plan area are within the service areas of both Southern California Edison (SCE) and the Los Angeles Department of Water and Power (LADWP). To provide a more conservative analysis of the net increase in GHG emissions from electricity, modeling uses the GHG intensity factors for the LADWP of 690.4 pounds per megawatt-hour (lb/MWh) for $CO_2$, 0.0489 lb/MWh for $CH_4$, and 0.007 lb/MWh for $N_2O$.

- **Solid Waste Disposal.** Indirect emissions from waste generation are based on CalEEMod defaults based on land use type.

- **Water/Wastewater**. Water use and wastewater generation are based on CalEEMod defaults based on land use type.

- **Refrigerants.** GHG emissions from operation of building air conditioning and refrigeration equipment are based on CalEEMod default values based on land use type.

Life cycle emissions are not included in the GHG analysis, consistent with California Resources Agency directives.[5] Black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the state's AB 32 inventory but treats it separately.[6] Additionally, industrial sources of emissions that require a permit from South Coast AQMD (permitted sources) are not included in the Project's community inventory since they have separate emission reduction requirements and are not anticipated as part of the Project. GHG modeling is included in Appendix B of this DEIR.

### 5.8.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.1.** Focus growth and the development of new commercial and housing as infill and re-use of commercial corridors and centers, while supporting current businesses and preserving the character of existing residential neighborhoods, parklands, and open spaces.

**Goal LU 3:** A community of distinct and livable places.

- **Policy LU 3.1.** Foster a land use pattern that brings everyday needs and amenities within walking distance of residential neighborhoods by encouraging neighborhood-scale retail and commercial uses adjacent to existing residential.

- **Policy LU 3.7.** Incentivize the inclusion of gathering places in commercial, mixed-use, and multifamily residential projects.

- **Policy LU 3.8.** Require new development along major thoroughfares and at the edges of commercial centers to be located and scaled to provide transitions in building height and bulk, consistent with the character of adjacent low-scale neighborhoods.

[5] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[6] Particulate matter emissions, which include black carbon, are analyzed in Section 5.3, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a).

**Goal LU 4:** A diversity of land uses providing for community needs.

- **Policy LU 4.3.** Encourage commercial uses that serve and are accessible to adjoining residential neighborhoods.

**Goal LU 5:** Quality residential neighborhoods that are great places to live.

- **Policy LU 5.2.** Encourage the development of small-scale local-serving and community-gathering uses that are within walking distance of residential neighborhoods.

**Goal LU 6:** Vital and active commercial and mixed-use districts serving residents and visitors to the community.

- **Policy LU 6.7.** Encourage the development of multi-modal transportation hubs within larger commercial and mixed-use centers.

**Goal LU 8:** A sustainable built environment.

- **Policy LU 8.3.** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources, generate pollution and greenhouse gas emissions, and employ other sustainable measures (e.g., LEED, Living Building Challenge, other).

- **Policy LU 8.4.** Support private development exceeds minimum site landscaping requirements and reduces the heat island effect, by incorporating green roofs and decks, durable awnings, increased tree canopy in lots not covered by buildings, bioswales and similar improvements.

- **Policy LU 8.5.** Incorporate sustainable landscaping and water management practices in parklands, medians, along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.).

**Goal LU 9:** A safe built environment and infrastructure.

- **Policy LU 9.1.** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).

- **Policy LU 9.2.** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation while still operational as necessary to protect adjoining neighborhoods and uses.

**Goal LU 12 (Ladera Center):** A revitalized and pedestrian-oriented mixed-use center providing services accessible to residents of adjoining neighborhoods and opportunities for new housing development, expanding the customer base for local businesses.

- **Policy LU 12.1.** Facilitate infill and new development of retail commercial and office uses integrated with housing on the upper levels or to the rear of commercial buildings.

- **Policy LU 12.2.** Promote the inclusion of landscape improvements, plazas, and other amenities and require buildings to be oriented and designed to contribute to an active pedestrian environment.

**Goal LU 13 (Wateridge Business Center):** Development of housing as infill on existing parking lots and long-term replacement of existing buildings and parking structures warranted by marketplace changes.

- **Policy LU 13.5.** Encourage the development of a multi-modal transportation hub independent of or in concert with infill development of the Slauson-Fairfax Home Depot Center.

- **Policy LU 13.6.** Encourage the adaptive re-use and improvement of existing buildings.

**Goal LU 14 (Slauson-Fairfax/Home Depot Center):** Long-term intensification and development as a pedestrian-oriented mixed-use center incorporating housing with commercial uses.

- **Policy LU 14.6.** Encourage the development of a multi-modal transportation hub independent of or in concert with infill development of the Wateridge Center.

**Goal LU 20 (Leimert Park Adjacent):** Concentration of commercial and residential uses providing continuity with properties developed along Crenshaw Boulevard adjacent to the Metro Transit Station.

- **Policy LU 20.2.** Promote development densities/intensities that encourage transit use by residents and business customers.

**Implementation Program LUI 7.** Consider developing incentives, such as low interest loans or grants, that encourage the owners and operators of cell towers located on ridgelines to consolidate facilities to the extent feasible, design improvements to enhance their visual quality, and incorporate extensive landscape.

### Mobility Element

**Goal M 1:** A safe, efficient, and accessible transportation network for all Westside communities.

- **Policy M 1.3.** Work with LA Metro and other transit agencies (such as Culver City Bus, LADOT, LADPW The Link, Big Blue Bus, etc.) to improve the reliability and safety, and provide more modes of transit service tailored to the needs of residents.

- **Policy M 1.6.** Prioritize the upgrading of pedestrian infrastructure to align with federal, state, and local design guidance and ADA accessibility standards to ensure accessibility for vulnerable users.

**Goal M 3:** Improved access to reliable, safe, and high-quality transit service.

- **Policy M 3.1.** Promote the use of transit by strategically orienting new developments around major transit stops and high-quality transit corridors. Apply the Los Angeles County Transit Oriented District (TOD) Design Guideline to new projects and emphasize design elements that facilitate transit use, including pedestrian walkways, bus plazas, and similar features.

- **Policy M 3.2.** Conduct a feasibility study to extend the Link - the Baldwin Hills Parklands shuttle to Marina del Rey and Ballona Wetlands through Ladera Heights, View Park and Windsor Hills.

- **Policy M 3.3.** Encourage convenient and safe transit, pedestrian, and bicycle linkages to/from transit service and mobility hubs by ensuring there are continuous bike and pedestrian pathways within one half mile of transit. Improve first/last-mile connections to Metro K Line stations, including Hyde Park, Leimert Park, and Martin Luther King Jr stations.

**Goal M 4:** Pedestrian and bicycle infrastructure is safe, connected, and comfortable for users of all ages and abilities.

- **Policy M 4.1.** Provide continuous pedestrian access along major streets by completing existing sidewalk infrastructure where gaps exist, such as La Brea Avenue between Slauson Avenue and Obama Boulevard, and Overhill Drive between Slauson Avenue and La Brea Avenue.

- **Policy M 4.2.** Enhance pedestrian crossing efficiency and safety at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive and intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Potential safety measures include pedestrian bridges, pedestrian signal phases, and high-visible crosswalks, pedestrian head starts, raised crossings, curb extensions, protected intersections etc.

- **Policy M 4.3**. Evaluate hotspots of bike-involved collisions (such as Slauson Avenue and La Brea Avenue) and implement safety measures for new bicycle facilities when updating the Los Angeles County Bicycle Master Plan.

- **Policy M 4.4.** Continue to build out and expand the existing trail and bicycle network in the community, connecting to parks and recreational areas, neighborhood commercial corridors, and other community destinations.

- **Policy M 4.5.** Fill in the existing bicycle network gap between the eastern and southern parts of Ladera Heights, View Park and Windsor Hills, as well as between the community and adjacent bicycle networks in Culver City and Leimert Park.

- **Policy M 4.7.** Expand the existing trail network by building safer pedestrian crossing infrastructure and adding signage and wayfinding between parks. Improve pedestrian connections between existing sidewalk and trail infrastructure in the community with future uses on the site of the Inglewood Oil Field.

- **Policy M 4.8.** Provide safe and continuous pedestrian networks that are mindful of user, roadway, and community characteristics through improvements to existing pedestrian areas.

- **Policy M 4.9.** Establish pedestrian and bicycle pathways connecting residential neighborhoods to redeveloped commercial corridors (Slauson Avenue and 54th Street) to promote non-auto travel for short trips.

- **Policy M 4.12.** Explore planning and constructing a Complete Street along 54th Street that creates a neighborhood-friendly space lined with shops, restaurants, cafes, and other commercial establishments.

**Implementation Program MI 4.** Seek funding and implement multimodal infrastructure projects that promote Complete Streets along 54th Street, coordinating efforts with City of Los Angeles in places where the County shares authority of traffic control and maintenance of roadways.

**Implementation Program MI 5.** Conduct a feasibility study to assess the viability of extending the Link–Baldwin Hills Parklands shuttle. Evaluate potential ridership, infrastructure requirements and operational considerations. Engage with local communities and relevant stakeholders to gather input.

**Implementation Program MI 6.** Conduct an inventory of sidewalk conditions to identify locations with gaps and damaged sidewalks. This may include:

- Work with community members to develop prioritization and funding plans to maintain sidewalks in good repair.
- Prioritize capital projects that fill existing sidewalk gaps.

**Implementation Program MI 7.** Explore pathways with wayfinding signage along high-traffic corridors to improve pedestrian connectivity.

**Implementation Program MI 8**. Develop Community Pedestrian Plans for Ladera Heights, View Park-Windsor Hills, and West Fox Hills communities for inclusion in Step-by-Step Los Angeles County: Pedestrian Plans for Unincorporated Communities with the aim of promoting healthy and active lifestyles. Include following study items:

- Explore mobility programs to increase transit access for underserved communities and vulnerable users, focusing on addressing walking challenges along steep streets, especially for seniors and people with disabilities.
- Evaluate the feasibility of a pedestrian bridge at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive to enhance pedestrian safety and community connections.
- Conduct a walk audit with community members and stakeholders along Slauson Avenue, Overhill Drive, La Brea Avenue, La Cienega Boulevard, Centinela Avenue, and Angeles Vista Boulevard to identify intersections for potential improvements to pedestrian facilities. Focus on intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Identify locations to improve crosswalk design features, such as crosswalk markings, curb extensions, and median islands.
- Conduct safety studies at intersections identified from the walk audit mentioned above and consider signal timing modifications to enhance safety for people crossing with lower mobility speeds, including youth, seniors, and the disabled. Potential signal timing improvements includes increased crossing time, Leading Pedestrian Intervals (LPI), protected turns, etc.

### Conservation and Open Space Element

**Goal COS 4:** Resources are conserved and infrastructure is adapted to improve resilience and minimize contributions to climate change.

- **Policy COS 4.1.** Encourage community members and existing developments to upgrade to water-conserving mechanisms such as stormwater capture systems, graywater systems, water-efficient appliances, and drought-tolerant landscape planting.
- **Policy COS 4.2.** Expand opportunities for EV charging at existing public facilities such as Ladera Park and Kenneth Hahn State Recreation Area.

## 5.8.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.8-1: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. [Threshold GHG-1 and GHG-2]**

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. The WSAP is a planning document, the approval of which would not directly result in the development of land uses and would not directly result in GHG emissions. Future GHG emissions may result from future development facilitated by adoption of the WSAP. As identified above in Section 5.8.2.1, *CEQA Guidelines Section 15183.5*, the 2045 CAP is a qualified GHG reduction plan. Therefore, the Project's GHG emissions impacts are evaluated based on consistency with the 2045 CAP, in accordance with CEQA Guidelines Section 15183.5.

### Net Increase in GHG Emissions

#### *Construction Phase*

**Less than Significant Impact.** Construction of future development under the WSAP has the potential to generate GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific project site. Construction emissions can vary substantially from day to day and would depend on the level of activity and the specific type and amount of equipment. However, as there are no specific projects currently approved or proposed under the WSAP and there is no knowledge as to timing of construction, location or the exact nature of future projects, analysis of construction emissions would be speculative at best. Information regarding specific development projects, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information would be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible.

Each future project developed under the WSAP would be required to comply with applicable EPA, CARB, and South Coast AQMD emissions standards, rules, and regulations. Furthermore, future development facilitated by adoption of the WSAP would be required to comply with the CARB Air Toxics Control Measure, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location (13 CCR Section 2485), CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, the new CAFE standards, and CARB Advanced Clean Car and Advanced Clean Trucks regulations, all of which support the goals of the CARB Climate Change Scoping Plan by requiring construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road vehicle and truck technologies as they become developed and commercially available. Mandatory compliance with these rules and regulations would reduce GHG emissions, including fuel combustion emissions of $CO_2$, $CH_4$, and $N_2O$, during future construction activities WSAP.

Additionally, GHG emissions from construction activities are one-time emissions that would cease upon completion whereas operational emissions are annual emissions. As such, construction emissions are a small portion of a project's lifetime GHG emissions. For these reasons, air districts have not traditionally considered construction emissions impacts separate from operational impacts of a project and have considered one-time emissions from construction activities to not substantially contribute to GHG emissions impacts (BAAQMD 2022).

### *Operation Phase*

Operation of future development facilitated by adoption of the WSAP would generate GHG emissions from vehicle trips traveling within the County, energy sources including electricity demand and natural gas combustion, area sources such as fireplaces and landscaping equipment, water conveyance and distribution, wastewater treatment, and solid waste decomposition. The projected increase GHG emissions resulting from future development projects facilitated by the WSAP were estimated and are presented in Table 5.8-5, *Net Increase in WSAP Annual GHG Emissions*. This is a conservative estimate, as the 12 Opportunity Sites[7] that could undergo future development changes are already developed with existing uses that generate GHG emissions.

[7] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

**Table 5.8-5 Net Increase in WSAP Annual GHG Emissions**

| Source | Net Increase in GHG Emissions | |
|---|---|---|
| | $MTCO_2e$ per Year | Percentage |
| On-Road Mobile | 39,854 | 72% |
| Area | 1,737 | 3% |
| Energy | 11,378 | 21% |
| Water | 744 | 1% |
| Solid Waste | 1,305 | 2% |
| Refrigerants | 8 | <1% |
| **Total** | 54,075 | 100% |

Source: CalEEMod, Version 2022.1; EMFAC 2021.
Notes: $MTCO_2e$ = metric ton of carbon dioxide equivalent

## Consistency with the Los Angeles County 2045 Climate Action Plan

The 2045 CAP builds on previous climate action work from the 2020 CCAP. The 2045 CAP identifies strategies, measures, and actions to mitigate emissions from community activities in the unincorporated county. The 2045 CAP is designed to be consistent with the reduction measures and recommendations in CARB's 2017 and 2022 Scoping Plans. The Pavley Program, Renewable Portfolio Standard, Low Carbon Fuel Standard, SB 375 land use and transportation strategies, energy efficiency measures, solar photovoltaic system measures, vehicle and fuel efficiency measures, landfill methane capture, and urban forestry practices are all measures in the 2017 and 2022 Scoping Plans that are also in the 2045 CAP.

The WSAP aligns with the policies and programs of the 2045 CAP relating to the reduction of GHG emissions. Most significantly, it would be consistent with targeting of growth near transit, active transportation, and commercial services, and expanding pedestrian infrastructure, in order to facilitate walking, biking and transit use in place of vehicular travel that can lead to increased GHG emissions. Goals and policies of the WSAP that would reduce GHG emissions are identified in Section 5.8.3.2, *Proposed Project Characteristics and Relevant WSAP Goals and Policies*. Specifically, Policy COS 1.2 ensures that new development in the plan area demonstrates consistency with the 2045 CAP Consistency Checklist or implements alternate project emissions reduction measures. Thus, future development projects that are facilitated by land use and zoning changes in the WSAP would be required to be consistent with the County's 2045 CAP goals and policies. Future development in accordance with the WSAP would not conflict with the 2045 Climate Action Plan and impacts would be less than significant.

## Consistency with Other Plans Adopted for the Purpose of Reducing GHG Emissions

### *CARB 2022 Scoping Plan*

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. However, new regulations

adopted by the State agencies result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that would affect a local jurisdiction's emissions inventory from the top down.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The WSAP would comply with these GHG emissions reduction measures since they are statewide strategies. In addition, as explained above, the CARB 2022 Scoping Plan expands on prior Scoping Plans and recent legislations, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier (CARB 2022). To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG reductions, technology, and clean energy mandated by statutes, reduction of short-lived climate pollutants, and mechanical carbon dioxide capture and sequestration actions.

Table 5.8-6, *Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies*, contains a list of the GHG-reducing strategies from the 2022 Scoping Plan. The analysis describes the WSAP's compliance and consistency with these strategies. The WSAP would not conflict with applicable 2022 Scoping Plan strategies and regulations to reduce GHG emissions.

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| **Transportation Technology Sector** | | |
| • Achieve 100 percent ZEV sales of light duty vehicles by 2035 and medium heavy-duty vehicles by 2040.<br>• Achieve 20 percent zero-emission target for the aviation sector.<br>• Develop a rapid and robust network of ZEV refueling infrastructure to support needed transition to ZEVs.<br>• Ensure that the transition of ZEV technology is affordable for low income households and communities of color, and meets the needs of communities and small business.<br>• Prioritize incentive funding for heavy-duty ZEV technology deployment in regions of the state with the highest concentrations of harmful criteria and toxic air contaminant emissions.<br>• Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity and hydrogen station grants from the | State agencies and local agencies | **Consistent.** Vehicles must transition to ZE technology to decarbonize the transportation sector. Executive Order N-79-20296 reflects the urgency of transitioning to zero emission vehicles (ZEVs) by establishing target dates for reaching 100 percent ZEV sales or fleet transitions to ZEV technology. EO N-79-20 calls for 100 percent ZEV sales of new light-duty vehicles by 2035. The Advanced Clean Cars II regulation fulfills this goal and serves as the primary mechanism to help deploy ZEVs. A number of existing incentive programs also support this transition, including the Clean Cars 4 All Program. EO N-79-20 also sets targets for transitioning the medium- and heavy-duty fleet to zero emissions: by 2035 for drayage trucks and by 2045 for buses and heavy-duty long-haul trucks where feasible. Replacing heavy-duty vehicles with ZEV technology will significantly reduce GHG emissions and diesel PM emissions in low-income communities and communities of color adjacent to ports, distribution centers, and highways. The existing Advanced Clean Trucks regulation, paired with the proposed Advanced Clean Fleets regulation, are designed to transition a significant amount of the Off-road vehicles rely heavily on ICE technology and EO N-79-20 |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| CEC's Clean Transportation Program pursuant to Executive Order B-48-18.<br>• Evaluate and continue to offer incentives similar to those through FARMER, Carl Moyer, the Clean Fuel Reward Program, the Community Air Protection Program, the Low Carbon Transportation, including CORE. Where feasible, prioritize and increase funding for clean transportation equity programs.<br>• Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector. | | sets an off-road equipment target of transitioning the entire fleet to ZEV technology by 2035, where feasible. There are a number of funding sources available to support this transition, including FARMER, Carl Moyer, and Community Air Protection Incentives; as well as Low Carbon Transportation Incentives, including the Clean Off-Road Equipment (CORE) program. Refueling infrastructure is a crucial component of transforming transportation technology. Electric vehicle chargers and hydrogen refueling stations must become easily accessible for all drivers to support a wholesale transition to ZEV technology. Deployment of ZEV refueling infrastructure is currently supported by a number of existing local and state public funding mechanisms. Intrastate aviation relies on ICE technology today, but battery-electric and hydrogen fuel cell aviation applications are in development, along with sustainable aviation fuel. While these actions and strategies apply to state and local agencies and does not directly apply to land used development planning projects, the standards would apply to all vehicles purchased or used by occupants, vendors, and visitors of the County. Future development facilitated by adoption of the WSAP would be required to comply with the County Municipal Code and CALGreen requirements regarding the number of electric vehicle-ready and electric vehicle-capable parking spaces to support ZEVs and PHEVs. As such, the WSAP is consistent with implementation of this strategy.<br>As with the LDV sector, a number of incentive programs support this transition, such as the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) with implementation of standards under the Advanced Clean Cars II Program, Advanced Clean Fleet Regulation, and HVIP consistent with reduction of GHG emissions under AB 1279. GHG emissions generated by passenger, truck, and bus vehicular travel as a result of future development facilitated by adoption of the WSAP would benefit from the above regulations and programs, and mobile source emissions would be reduced with implementation. Thus, the WSAP would be consistent with actions under the transportation technology sector. |
| **Transportation Fuels Sector** | | |
| • Accelerate the reduction and replacement of fossil fuel production and consumption in California.<br>• Incentivize private investment in new zero-carbon fuel production in California.<br>• Incentivize the transition of existing fuel production and distribution assets to support deployment of low and zero-carbon fuels while protecting public health and the environment. | State agencies and local agencies | **Consistent.** The state must continue to support low-carbon liquid fuels during this period of transition and for much harder sectors for ZEV technology such as aviation, locomotives, and marine applications. Biomethane currently displaces fossil fuels in transportation and will largely be needed for hard-to-decarbonize sectors but will likely continue to play a targeted role in some fleets while the transportation sector transitions to ZEVs. Private investment in alternative fuels will play a key role in diversifying the transportation fuel supply away from fossil fuels. EO N-79-20 calls on state agencies to support the transition of existing fuel production facilities away from fossil fuels and directs that this transition also protect and support workers, |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| • Invest in the infrastructure to support reliable refueling for transportation such as electricity and hydrogen refueling.<br>• Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.<br>- Initiate a public process focused on options to increase the stringency and scope of the LCFS:<br>- Evaluate and propose accelerated carbon intensity targets pre-2030 for LCFS.<br>- Evaluate and propose further declines in LCFS post-2030 carbon intensity targets to align with this 2022 Scoping Plan.<br>- Consider integrating opt-in sectors into the program.<br>- Provide capacity credits for hydrogen and electricity for heavy-duty fueling.<br>• Monitor for and ensure that raw materials used to produce low-carbon fuels or technologies do not result in unintended consequences | | public health, safety, and the environment. In line with this direction, existing refineries could be repurposed to produce sustainable aviation fuel, renewable diesel, and hydrogen. While these actions and strategies apply to state and local agencies, GHG emissions generated by passenger, truck, and bus vehicular travel as a result of future development facilitated by adoption of the WSAP would benefit from the above regulations and programs, and mobile source emissions would be reduced with implementation, and mobile source emissions generated by future development facilitated by adoption of the WSAP would be reduced with implementation of the wider use of zero-carbon fuels consistent with reduction of GHG emissions under AB 1279. Thus, the WSAP would be consistent with actions in the transportation fuels sector |
| **Vehicles Miles Traveled Sector** | | |
| • Achieve a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.<br>• Reimagine new roadway projects that decrease VMT in a way that meets community needs and reduces the need to drive.<br>• Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience.<br>• Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices<br>• Expand and complete planned networks of high quality active transportation infrastructure.<br>• Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT impact service models that complement transit and ensure equitable access for priority populations.<br>• Streamline access to public transportation through programs such as the California Integrated Travel Project.<br>• Ensure alignment of land use, housing, transportation, and conservation planning in | State agencies and local agencies | **Consistent.** Managing total demand for transportation energy by reducing the miles people need to drive on a daily basis is also critical as the state aims for a sustainable transportation sector in a carbon neutral economy. VMT reductions will play an indispensable role in reducing overall transportation energy demand and achieving the state's climate, air quality, and equity goals. CARB did not set regulatory limits on VMT in the 2022 Scoping Plan because the authority to reduce VMT largely lies with state, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices. While these actions and strategies apply to state and local agencies, SB 375 requires SCAG to direct the development of the RTP/SCS for the region. The WSAP would be consistent with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern. The location, design, and land uses of the growth anticipated by the WSAP would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the County. Further, the location, design, and land use from future growth anticipated by the WSAP would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the County by increasing future mixed-use, commercial, and residential developments around major transit areas. Several transit agencies provide local and regional transit service within the WSAP, including Metro, Access, Culver CityBus, Santa Monica Big Blue Bus, LADOT Transit, and Los Angeles County services. The WSAP focuses on ensuring smart growth, ensuring |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| adopted regional plans, such as regional transportation plans (RTP)/ sustainable communities strategies (SCS), regional housing needs assessments (RHNA), and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support implementation of these plans.<br>• Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower income residents. | | community services and infrastructure are sufficient to accommodate growth, provide the foundation for a strong and diverse economy, promote excellence in environmental resource management, and provide healthy, livable, and equitable communities. New land use designations that introduce greater flexibility by increasing density and through emphasis on residential (single family, two-family, multiple), commercial, and mixed uses instead of agricultural, business/commercial or single-family residence uses are proposed to facilitate development to achieve this vision and respond to the need to accommodate the Westside Planning Area's growing and diverse population. The proposed zoning modifications would allow higher densities of growth focused within one mile of major transit stops, within a half mile of high-quality transit corridors, and within a quarter mile of established or new commercial centers that would have access to frequent transit services. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities, and proposed improvements to the bicycle, pedestrian, and road networks will make it easier for residents to travel throughout the community. Therefore, the WSAP would be consistent with the VMT reduction standards of the RTP/SCS and the WSAP would be consistent with applicable RTP/SCS actions and strategies to reduce GHG emissions. |
| **Clean Electricity Grid Sector** | | |
| • Use long-term planning processes (Integrated Energy Policy Report, IRP, CAISO Transmission Planning Process, AB 32 Climate Change Scoping Plan) to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment.<br>• Complete systemwide and local reliability assessments across CAISO and other balancing authority areas, using realistic assumptions for land use, build rates, statewide and distribution system level constraints, and energy needs. Such assessments should be completed before state agencies update their electricity sector GHG targets.<br>• Prioritize actions to mitigate impacts to electricity reliability and affordability and provide sufficient flexibility in the state's decarbonization roadmap for adjustments as may be needed.<br>• Facilitate long lead-time resource development through the IRP and the SB 100 interagency process and through technology | State agencies and local agencies | **Consistent**. Decarbonizing the electricity sector depends on both using energy more efficiently and replacing fossil-fueled generation with renewable and zero carbon resources, including solar, wind, energy storage, geothermal, biomass, and hydroelectric power. The RPS Program and the Cap-and-Trade Program continue to incentivize dispatch of renewables over fossil generation to serve state demand. SB 100 increased RPS stringency to require 60 percent renewables by 2030 and for California to provide 100 percent of its retail sales of electricity from renewable and zero-carbon resources by 2045. Furthermore, SB 1020 has added interim targets to SB 100's policy framework to require renewable and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all electricity retail sales by 2040; establish a planning goal of at least 20 GW of offshore wind by 2045; and that state agencies plan for an energy transition that avoids the need for new fossil gas capacity to meet California's long-term energy goals. California also continues to advance its appliance and building energy efficiency standards to reduce growth in electricity consumption and meet the SB 350 goal to double statewide energy efficiency savings in electricity and fossil gas end uses by 2030. Increased transportation and building electrification and continued policy commitment to behind- |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| development and demonstration funding that includes resources such as long-duration energy storage and hydrogen production.<br>• Continue coordination between energy agencies and energy proceedings to maximize opportunities for demand response.<br>• Continue to explore the benefits of regional markets to enhance decarbonization, reliability, and affordability.<br>• Address resource build-out challenges, including permitting, interconnection, and transmission network upgrades.<br>• Explore new financing mechanisms and rate designs to address affordability.<br>• Per SB 350, double statewide energy efficiency savings in electricity and fossil gas end uses by 2030, through a combination of energy efficiency and fuel substitution actions.<br>• Per SB 100 and SB 1020, achieve 90 percent, 95 percent, and 100 percent renewable and zero-carbon retail sales by 2035, 2040, and 2045, respectively.<br>• Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.<br>• Target programs and incentives to support and improve access to renewable and zero-carbon energy projects (e.g., rooftop solar, community-owned or controlled solar or wind, battery storage, and microgrids) for communities most at need, including frontline, low-income, rural, and indigenous communities.<br>• Prioritize public investments in zero-carbon energy projects to first benefit the most overly burdened communities affected by pollution, climate impacts, and poverty. | | the-meter solar and storage will continue to drive growth of microgrids and other distributed energy resources (DER). Continued transition to renewable and zero-carbon electricity resources will enable electricity to become a zero-carbon substitute for fossil fuels. To reach the 2045 target, the state will need to quadruple its current level of wind and solar capacity. This transformation will drive investments in a large fleet of generation and storage resources but will also require significant transmission to accommodate these new capacity additions. Resources such as storage and demand-side management are essential to maintain reliability with high concentrations of renewables. Hydrogen produced from renewable resources and renewable feedstocks can serve a dual role as a low-carbon fuel for existing combustion turbines or fuel cells, and as energy storage for later use. While these actions and strategies apply to state and local agencies, the WSAP would support SB 100's goals since future development facilitated by adoption of the WSAP would utilize the renewable energy provided by the regulated entities, LADWP and SCE. Future development facilitated by adoption of the WSAP would use electricity consistent with the requirements of SB 100. The WSAP would comply with this action/strategy as the County is located within the LADWP and SCE service areas and future development facilitated by adoption of the WSAP would be required to comply with CALGreen and Title 24 energy efficiency standards. As such, the WSAP would be consistent with SB 100. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under California Code of Regulations Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. Future development facilitated by adoption of the WSAP would meet or exceed the applicable requirements of Title 24, Part 6, as well as the California Green Building Standards Code in Title 24, Part 11 as adopted and amended in the County Municipal Code. The WSAP would further support this action and strategy by incorporating energy efficiency measures as outlined in the WSAP policies. As such, the WSAP would be consistent with SB 350. |
| **Sustainable Manufacturing and Buildings Industry Sector** | | |
| • Maximize air quality benefits using the best available control technologies for stationary sources in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities.<br>• Prioritize alternative fuel transitions first in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities. | State agencies and local agencies | **Consistent.** Fossil gas is the primary gaseous fossil fuel used to produce heat at industrial facilities, as well as in residential and commercial buildings. Gaseous fossil fuel use can be displaced by four primary alternatives: zero-carbon electricity, solar thermal heat, hydrogen, and biogas/biomethane. The 2022 Scoping Plan reduces dependence on fossil gas in the industrial and building sectors by transitioning substantial energy demand to alternative fuels. Combustion of fossil gas, other gaseous fossil fuels, and solid fossil fuels provide energy to meet three broad industry needs: electricity, steam, and process |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| • Invest in research and development and pilot projects to identify options to reduce materials and process emissions along with energy emissions in California's industrial manufacturing facilities, leveraging programs like the CEC's Electric Program Investment Charge (EPIC).<br>• Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.<br>• Support electrification with changes to industrial rate structures.<br>• Develop infrastructure for CCS and hydrogen production to reduce GHG emissions where cost-effective and technologically feasible non-combustion alternatives are not available.<br>• Implement SB 905.<br>• Establish markets for low-carbon products and recycled materials using Buy Clean California Act and other mechanisms relying on robust data.<br>• Develop a net-zero cement strategy to meet SB 596 targets for the GHG intensity of cement use in California.<br>• Continue to leverage energy-efficiency programs, including the U.S. DOE's ENERGY STAR program, U.S. DOE's Superior Energy Performance program, and ISO 50001.<br>• Evaluate and continue to offer incentives to install energy efficiency and renewable energy technologies through programs such as CPUC decisions as part of rulemaking R.19-09-009393 and the CEC's Food Production Investment Program (FPIP) and EPIC programs.<br>• Leverage low-carbon hydrogen programs, including the Bipartisan Infrastructure Law, for regional hydrogen hubs, hydrogen electrolysis, and hydrogen manufacturing and recycling.<br>• Evaluate the role of hydrogen in meeting GHG emission reductions, including policy recommendations regarding the use of hydrogen in California as required by SB 1075.<br>• Address cost barriers to promote low-carbon fuels for hard-to-electrify industrial applications. | | heat. Non-combustion emissions result from fugitive emissions and from the chemical transformations inherent to some manufacturing processes. About 20 percent of the GHG emissions from the industrial sector are non-combustion emissions. Decarbonizing industrial facilities depends upon displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low carbon fuels to provide energy for heat and reduce combustion emissions. Emissions also can be reduced by implementing energy efficiency measures and using substitute raw materials that can reduce energy demand and some process emissions. Some remaining combustion emissions and some non-combustion $CO_2$ emissions can be captured and sequestered. This sector has a continuing demand for fossil gas due to lack of non-combustion technologically feasible or cost effective alternatives for certain industrial sectors. Microgrids powered by renewable resources and with battery storage are emerging as a key enabler of electrification and decarbonization at industrial facilities. While these actions and strategies apply to state and local agencies, each future project developed under the WSAP would be required to comply with applicable EPA, CARB and South Coast AQMD emissions standards, rules, and regulations regarding fossil fuel use as well as conduct their own applicable CEQA analysis that would determine significance based on the individual project specifics. As such, the WSAP would be consistent with actions in the sustainable manufacturing and buildings industry sector. |
| **Sustainable Manufacturing and Buildings Building Sector** | | |
| • Prioritize California's most vulnerable residents with the majority of funds in the new $922 million Equitable Building Decarbonization program, created through the | State agencies and local agencies | **Consistent**. Achieving carbon neutrality must include transitioning away from fossil gas in residential and commercial buildings and will rely primarily on advancing energy efficiency while replacing gas appliances with non- |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| 2022–2023 state budget. This would include residents in frontline, low-income, disadvantaged, rural, and tribal communities. This program is dedicated to a statewide direct-install building retrofit program for low-income households to replace fossil fuel appliances with electric appliances, energy-efficient lighting, and building insulation and sealing while also coordinating reductions in gas infrastructure in specific geographic areas.<br>• Achieve three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030.<br>• Expand incentive programs to support the holistic retrofit of existing buildings, especially for vulnerable communities.<br>• Ensure that incentive programs prioritize energy affordability and tenant protections, promote affordable and low-income household retrofits that improve habitability and reduce expenses, protect and empower small landlords and homeowners, address overlooked consumer groups, and pair decarbonization with other critically needed renovation efforts to ensure that buildings support human health and are climate- and weather-resistant.<br>• End fossil gas infrastructure expansion for newly constructed buildings.<br>• Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.<br>• Strengthen California's building standards to support zero-emission new construction.<br>• Develop building performance standards for existing buildings.<br>• Adopt a zero-emission standard for new space and water heaters sold in California beginning in 2030, as specified in the 2022 State Strategy for the State Implementation Plan.<br>• Expand use of low-GWP refrigerants within buildings.<br>• Support electrification with changes to utility rate structures and by promoting load management programs.<br>• Increase funding for incentive programs and expand financing assistance programs focused on existing buildings and appliance replacements. | | combustion alternatives. This transition must include the goal of trimming back the existing gas infrastructure, so pockets of gas-fueled residential and commercial buildings do not require ongoing maintenance of the entire limb for gas delivery. Blending low carbon fuels such as hydrogen and biomethane into the pipeline further displaces fossil gas. Pipeline safety and reliability must be evaluated to accommodate low-carbon fuels. This transition is achieved when all new buildings constructed include non-combustion appliances, and appliances in existing buildings are replaced at the end of their useful life with non-combustion alternatives. While these actions and strategies apply to state and local agencies, as stated above, each future project developed under the WSAP would be required to comply with applicable EPA, CARB and South Coast AQMD emissions standards, rules, and regulations regarding fossil fuel use as well as conduct their own applicable CEQA analysis that would determine significance based on the individual project specifics. As such, the WSAP would be consistent with actions in the sustainable manufacturing and buildings industry sector. |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| • Expand consumer education efforts to raise awareness and stimulate the adoption of decarbonized buildings and appliances, especially in vulnerable communities.<br>• Implement biomethane procurement targets for investor-owned utilities as specified in SB 1440 (Hueso, Chapter 739, Statutes of 2018) to reduce GHG emissions in remaining pipeline gas and reduce methane emissions from organic waste. | | |
| **Carbon Dioxide Removal and Capture Sector** | | |
| • Implement SB 905.<br>• Convene a multi-agency Carbon Capture and Sequestration Group comprised of federal, state, and local agencies to engage with environmental justice advocates, tribes, academics, researchers, and community representatives to identify the current status, concerns, and outstanding questions concerning CCS, and develop a process to engage with communities to understand specific concerns and consider guardrails to ensure safe and effective deployment of CCS.<br>• Iteratively update the CARB CCS Protocol with the best available science and implementation experience.<br>• Incorporate CCS into other sectors and programs beyond transportation where cost-effective and technologically feasible options are not currently available and to achieve the 85 percent reduction in anthropogenic sources below 1990 levels as called for in AB 1279.<br>• Evaluate and propose, as appropriate, financing mechanisms and incentives to address market barriers for CCS and CDR.<br>• Evaluate and propose, as appropriate, the role for CCS in cement decarbonization (SB 596) and as part of hydrogen production pathways (SB 1075).<br>• Support carbon management infrastructure projects through core CEC research, development, and demonstration (RD&D) programs.<br>• Continue to explore carbon capture applications for producing or leveraging zero-carbon power for reliability needs as part of SB 100.<br>• Consider carbon capture infrastructure when developing hydrogen roadmaps and strategy, especially for non-electrolysis hydrogen production. | State agencies and local agencies | **Consistent**. The deployment of CDR to counterbalance hard-to-abate residual emissions is unavoidable if net zero $CO_2$ or GHG emissions are to be achieved. Modeling shows that emissions from the AB 32 GHG Inventory sources will continue to persist even if all fossil related combustion emissions are phased out. These residual emissions must be compensated for to achieve carbon neutrality wither with CDR, which includes both sequestration in natural and working lands and mechanical approaches like direct air capture, CCS, which is carbon capture from anthropogenic point sources involves capturing carbon from a smokestack of an emitting facility, or direct air capture, which captures carbon directly from the atmosphere. While these actions and strategies apply to state and local agencies, the WSAP is a land use development planning project that would be consistent with measures to increase carbon dioxide removal and capture. |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| • Evaluate and streamline permitting barriers to project implementation while protecting public health and the environment.<br>• Explore options for how local air quality benefits can be achieved when CCS is deployed.<br>• Explore opportunities for CCS and CDR developers to leverage existing infrastructure, including subsurface infrastructure.<br>• Explore permitting options to allow for scaling the number of sources at carbon sequestration hubs. | | |
| **Short-Lived Climate Pollutants (Non-Combustion Gases) Dairy and Livestock Methane Sector** | | |
| • Install state-of-the-art anaerobic digesters that maximize air and water quality protection, maximize biomethane capture, and direct biomethane to sectors that are hard to decarbonize or as a feedstock for energy.<br>• Increase alternative manure management projects, including but not limited to conversion to "solid," "dry," or "scrape" manure management; installation of a compost-bedded pack barn; an increase in the time animals spend on pasture; and implementation of solid-liquid separation technology into flush manure management systems.<br>• Implement enteric fermentation strategies that are cost-effective, scientifically proven, safe for animal and human health, and acceptable to consumers, and that do not impact animal productivity. Provide financial incentives for these strategies as needed.<br>• Accelerate demand for dairy and livestock product substitutes such as plant-based or cell-cultured dairy and livestock products to achieve reductions in animal populations.<br>• In consideration of the pace of deployment of methane mitigation strategies and the scale of complementary incentives, consider regulation development to ensure that the 2030 target is achieved, assuming the conditions outlined in SB 1383 are met. | State agencies and local agencies | **Consistent**. Short-Lived Climate Pollutants (SLCPs) include black carbon, methane, and fluorinated gases. HFCs are the fastest growing source of GHG emissions, primarily driven by their use to replace ozone-depleting substances and an increased demand for cooling and refrigeration. Dairy and livestock are the largest source of methane emissions followed by landfills. Black Carbon, soot, comes primarily from transportation, specifically heavy-duty vehicles followed by fuel combustion for residential, commercial, and industrial applications. The WSAP would be consistent with SLCP dairy and livestock methane sector actions in the 2022 Scoping Plan. The WSAP is a land use development planning project that does not include dairy or livestock. |
| **Short-Lived Climate Pollutants (Non-Combustion Gases) Landfill Methane Sector** | | |
| • Maximize existing infrastructure and expand it to reduce landfill disposal, with strategies including composting, anaerobic digestion, co-digestion at wastewater treatment plants, and other non-combustion conversion technologies.<br>• Expand markets for products made from organic waste, including through recognition | State agencies and local agencies | **Consistent**. SB 1383 has a 75 percent organic waste disposal reduction target below the 2013 baseline by 2030. The state did not achieve the 50 percent reduction in organic waste disposal below 2014 levels by 2020. The CPUC approved a decision in February 2022 implementing the biomethane procurement program, which will require investor-owned utilities by 2025 to procure 17.6 billion cubic feet (BCF) of biomethane produced from organic wastes to |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| of the co-benefits of compost, biochar, and other products.<br>• Recover edible food to combat food insecurity.<br>• Invest in the infrastructure needed to support growth in organic recycling capacity.<br>• Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity.<br>• Direct biomethane captured from landfills and organic waste digesters to sectors that are hard to decarbonize.<br>• Implement improved technologies and best management practices at composting and digestion operations.<br>• Reduce emissions from landfills through improvements in operational practices, lower permeability covers, advanced collection systems, and technologies to utilize landfill gas.<br>• Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks, improve understanding of the factors that lead to better capture efficiency, and explore new technologies and practices that can reliably improve methane control at landfills. | | support the landfill disposal reduction and SLCP target and reduce fossil gas reliance for residential and commercial customers. Organic waste will also be reduced by measure to remove edible food from the stream. Emissions can also be reduced by improvements in operational practices at landfills including lower permeability covers, advanced landfill gas collection systems, and increased monitoring to detect and repair leaks. The WSAP would be consistent with SLCP landfill methane sector actions in the 2022 Scoping Plan. |
| **Short-Lived Climate Pollutants (Non-Combustion Gases) Upstream Oil and Gas Methane Sector** | | |
| • Mitigate emissions from leaks by regular leak detection and repair (LDAR) surveys at all facilities.<br>• Replace high-emitting equipment with zero-emission alternatives wherever feasible.<br>• Have CARB and CalGEM lead a Task Force to identify and address methane leaks from oil infrastructure near communities.<br>• Pursuant to SB 1137, develop leak detection and repair plans for facilities in health protection zones, implement emission detection system standards, and provide public access to emissions data.<br>• Minimize emissions from equipment that must vent fossil gas by design (e.g., fossil gas-powered compressors).<br>• Install vapor collection systems on high-emitting equipment.<br>• Phase out venting and routine flaring of associated gas (gas produced as a by-product during oil production). | State agencies and local agencies | **Consistent**. California is currently on track to achieve a 41 percent reduction in methane emission from oil and gas production by 2025 relative to 2013. To meet the 2030 target, regulatory requirements to further reduce intentional venting of fossil gas from equipment are needed. While these actions and strategies apply to state and local agencies, the WSAP would be consistent with SLCP upstream oil and gas methane sector actions in the 2022 Scoping Plan.<br><br>Additionally, the Baldwin Hills Community Standards District (BHCSD) provides additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. On January 30, 2024, the Board of Supervisors approved the BHCSD Amendment, which amends the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance, which was adopted by the Board on January 24, 2023. This Amendment prohibits the location of |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| • Implement continuous ambient monitoring at fossil gas underground storage facilities to quickly detect large methane sources.<br>• Reduce pipeline and compressor blowdown emissions.<br>• Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks. | | new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period. |
| **Short-Lived Climate Pollutants (Non-Combustion Gases) Hydrofluorocarbons Sector** | | |
| • Expand the use of very low- or no-GWP technologies in all HFC end-use sectors, including emerging sectors, like heat pumps for applications other than space conditioning, to maximize the benefits of building decarbonization.<br>• Convert large HFC emitters such as existing refrigeration systems to the lowest practical GWP technologies.<br>• Prioritize small-scale and independent grocers serving priority populations in addressing existing "banks" of high-GWP refrigerants.<br>• Improve recovery, reclamation, and reuse of refrigerants by limiting sales of new or virgin high-GWP refrigerants and requiring the use of reclaimed refrigerants where appropriate.<br>• Assist low-income and disadvantaged communities in obtaining low-GWP space conditioning units to protect vulnerable communities from heat stress and wildfire smoke.<br>• Accelerate technology transitions in California and the U.S. overall by collaborating with international partners committed to taking action on HFCs under the Kigali Amendment to the Montreal Protocol; this includes addressing barriers to adoption of very low- or no-GWP refrigerant technologies such as high upfront costs, shortage of trained technicians, and lag in updating safety standards and building codes. | | **Consistent**. New targeted measures are needed to reduce HFCs, primarily from high-GWP refrigerants, to meet 2045 requirements. HFC emissions from new and existing sources need to be addressed in tandem with building decarbonization efforts to maximize reductions. The adoption of low-GWP refrigerants must occur in parallel with building decarbonization efforts. The sales prohibitions on newly produced refrigerants set forth in SB 1206 and the national/international HFC phasedown will help in reducing HFC emissions from existing equipment by restricting the supply of and increasing the value of existing high-GWP HFCs. While these actions and strategies apply to state and local agencies, the WSAP would be consistent with SLCP hydrofluorocarbons sector actions in the 2022 Scoping Plan. These regulations would be applicable to future development facilitated by adoption of the WSAP to the extent that new development would use these regulated compounds in accordance with regulations. Any such future development would be required to comply with applicable regulations from this CARB Short-Lived Climate Pollutants reduction strategy, with respect to adopted limits on the use of regulated compounds for refrigeration uses. Therefore, the WSAP would be consistent with this strategy. |
| **Short-Lived Climate Pollutants (Non-Combustion Gases) Anthropogenic Black Carbon Sector** | | |
| • Reduce fuel combustion commensurate with state's climate and air quality programs, particularly from reductions in transportation emissions and agricultural equipment emissions.<br>• Invest in residential wood smoke reduction. | State agencies and local agencies | **Consistent**. Under current strategies, anthropogenic black carbon from transportation is expected to be reduced by over 60 percent in 2030. Continued reductions in combustion emissions across all sectors from both the state's climate and air quality programs will also reduce anthropogenic black carbon emissions. While these actions and strategies apply to state and local agencies, the WSAP would be consistent with SLCP anthropogenic black carbon sector actions in the 2022 Scoping Plan. As discussed above, the location, design, and land uses of future growth facilitated by adoption of the WSAP would implement land |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| | | use and transportation strategies related to reducing vehicle trips for residents and employees of the County. Further, the location, design, and land use from future growth anticipated by the WSAP would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the County by increasing future mixed-use, commercial, and residential developments around major transit areas, which also results in a reduction of fuel combustion. |
| **Natural and Working Lands: Strategies for all NWL** | | |
| • Implement AB 1757 and SB 27.<br>• Implement the Climate Smart Strategy.<br>• Accelerate the pace and scale of climate smart action, consistent with the management levels identified above, as part of a collective effort between federal, state, private, nonprofit, and individual land managers.<br>• Prioritize and practice equity, including through meaningful community engagement and prioritizing implementation of nature-based solutions that benefit the communities most vulnerable to climate change.<br>• Advance multi-benefit, collaborative, landscape-level approaches that engage communities and landowners, and incorporate adaptive management.<br>• Consult and partner with California Native American tribes to increase co-management and tribal management authority; restore, protect, and enhance natural cultural resources, traditional foods, and cultural landscapes; respect tribal sovereignty; and support tribes' implementation of tribal expertise and Traditional Ecological Knowledge and cultural easements.<br>• Leverage existing innovative financial and market mechanisms, and explore new ones, between the public, private, and philanthropic sectors to secure funding of climate smart land management.<br>• In partnership with communities, tribes, and the private sector, expand and develop new infrastructure for manufacturing and processing of climate smart agricultural and biomass products.<br>• Leverage and support technical assistance providers such as the UC Cooperative Extension and California's 98 Resource Conservation Districts, that have track records of providing technical assistance to local landowners and implementing agriculture, | State agencies and local agencies | **Consistent**. AB 1757 calls for the development of an ambitious range of targets for the NWL sector to be integrated into the Scoping Plan and other state policies. SB 27 directed CARB to establish $CO_2$ removal targets for 2030 and beyond. In response to EO N-82-20 and AB 1757, the proposed target for NWL for 2045 is a -4 percent change in total carbon stock from 2014. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. However, the WSAP would not interfere, impede, or conflict with NWL strategies for all NWL actions under the 2022 Scoping Plan. |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| forestry, natural resource management, and restoration projects across the state.<br>• Establish and expand mechanisms that ensure NWL are protected from land conversion and parcelization (e.g., conservation easements or Williamson Act), in line with the strategies outlined in CNRA's Pathways to 30x30 California. Pair land conservation projects with management plans that increase carbon sequestration, where feasible.<br>• Increase opportunities for private and philanthropic investments in nature-based climate solutions, utilizing existing voluntary and compliance carbon markets, existing state and local programs, and the California Carbon Sequestration and Climate Resiliency Project Registry established pursuant to SB 27.<br>• Expand monitoring and tracking of management actions and outcomes consistent with the tracking and monitoring recommendations of the Climate Smart Strategy. | | |
| **Natural and Working Lands: Forest Shrublands and Chaparral** | | |
| • Accelerate the pace and scale of climate-smart forest management to at least 2.3 million acres annually by 2025, in line with the climate-smart management strategies identified in this Scoping Plan, the NWL Climate Smart Strategy, and the Wildfire and Forest Resilience Action Plan.<br>• Establish and expand mechanisms that ensure forests, shrublands, and grasslands are protected from land conversion and that support ongoing, rather than one-time, management actions.<br>• In collaboration with state and local agencies, accelerate the deployment of long-term carbon storage from waste woody biomass residues resulting from climate-smart management, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums.<br>• Expand infrastructure to facilitate processing of biomass resulting from climate-smart management.<br>• Expand permit streamlining in collaboration with state and local agencies to accelerate implementation of climate-smart forest management while protecting natural resources. | State agencies and local agencies | **Consistent**. California is covered by 27 percent forests and 31 percent shrublands and chaparral. Climate smart management can help make forests more resilient to climate change and less prone to catastrophic wildfire. Climate-smart management in shrublands and chaparral face can provide protection for threatened communities and natural resources. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. However, the WSAP would not interfere, impede, or conflict with strategies on any NWL where forests, shrublands, and chaparral occur under the 2022 Scoping Plan. |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| **Natural and Working Lands: Grasslands** | | |
| • Establish and expand mechanisms that ensure grasslands are protected from land conversion/parcelization and that support ongoing, rather than one-time, management actions that improve carbon sequestration.<br>• Deploy grassland management strategies, like prescribed grazing, compost application, and other regenerative practices, to support soil carbon sequestration, biodiversity, and other ecological improvements.<br>• Increase adoption of compost production on farms and application of compost in appropriate grassland settings for improved vegetation and carbon storage, and to deliver waste diversion goals through nature-based solutions. | State agencies and local agencies | **Consistent**. California is covered by 9 percent grasslands. The protection of grasslands provides an opportunity to reduce sprawl and complement VMT reduction strategies. Climate smart strategies can increase grassland resilience to climate change by improving species diversity and maintaining or increasing soil carbon stocks. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. However, the WSAP would not interfere, impede, or conflict with strategies on any NWL where grasslands occur under the 2022 Scoping Plan. |
| **Natural and Working Lands: Croplands** | | |
| • Accelerate the pace and scale of healthy soils practices to 80,000 acres annually by 2025, conserve at least 8,000 acres of annual crops annually, and increase organic agriculture to 20 percent of all cultivated acres by 2045.<br>• Utilize the recommendations included in CDFA's Farmer and Rancher-Led Climate Change Solutions report to accelerate the deployment of healthy soils practices, organic farming, and climate-smart agriculture practices.<br>• Establish or expand financial mechanisms that support ongoing deployment of healthy soils practices and organic agriculture.<br>• Support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems, such as implementing the California Department of Pesticide Regulation's (DPR's) Sustainable Pest Management Work Group recommendations.<br>• Conduct research on the intersection of pesticides, soil health, GHGs, and pest resiliency via a multi-agency effort with DPR, CDFA, and CARB.<br>• Conduct outreach and education to develop and facilitate the increased adoption of safer, more sustainable pest management practices and tools; reduce the use of harmful pesticides; promote healthy soils; improve water and air quality; and reduce public health impacts.<br>• In collaboration with state and local agencies, accelerate the deployment of alternatives to | State agencies and local agencies | **Consistent**. Climate smart practices can maintain or increase the climate resilience of cropland productivity through improved soil conditions and increased pollinator habitat. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. However, the WSAP would not interfere, impede, or conflict with strategies on any NWL where croplands occur under the 2022 Scoping Plan. |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| agricultural burning that increase long-term carbon storage from waste agricultural biomass, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums.<br>• Work across state agencies to reduce regulatory and permitting barriers around some healthy soils practices (e.g., composting), where appropriate.<br>• Utilize innovative agriculture energy use and carbon monitoring and planning tools to reduce on-farm GHG emissions from energy and fertilizer application or to increase carbon storage, as well as to promote on-farm energy production opportunities. | | |
| **Natural and Working Lands: Wetlands** | | |
| • Restore 60,000 acres of Delta wetlands annually by 2045 to reduce methane emissions from wetlands and reverse the resulting subsidence.<br>• Identify and prioritize wetland restoration efforts around climate vulnerable communities.<br>• Leverage other funding and institutions to support wetland restoration projects, including land trusts, local funding, federal funding, and private and philanthropic funding to support wetlands restoration projects.<br>• Work across state agencies to reduce regulatory and permitting barriers around wetland restoration projects, where appropriate. | State agencies and local agencies | **Consistent**. Wetlands are hotspots for diversity, contain considerable carbon in the soil, are critical to the states' water supply, and protect upland areas from flooding due to sea level rise and storms. Climate smart strategies to restore and protect wetlands can reduce emissions while simultaneously improving the climate resilience of surrounding areas and improving the water quality and yield for the state. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. However, the WSAP would not interfere, impede, or conflict with strategies on any NWL where wetlands occur under the 2022 Scoping Plan. The WSAP proposes no land use changes to Ballona Wetlands, which is within the Planning Area. |
| **Natural and Working Lands: Developed Lands** | | |
| • Increase urban forestry investment annually by 200 percent, relative to business as usual.<br>• Increase public awareness of urban forest benefits and, where appropriate, prioritize irrigation of trees over lawns.<br>• Provide technical assistance and resources to disadvantaged communities to implement community urban greening projects to provide equitable access to the benefits of urban greening projects.<br>• Work with state and local agencies to expand technical assistance for and enforcement of the defensible space requirements of PRC 4291 to reduce wildfire risk to homes and structures. | State agencies and local agencies | **Consistent**. Developed lands include urban, suburban, and rural areas, as well as transportation and supporting infrastructure. The vegetation within cities and communities are all part of developed lands. This vegetation provides numerous benefits to surrounding areas, including carbon storage, air and water filtration, reduced urban heat island effect, and access to nature, Climate smart strategies to protect and expand the urban forests, landscaping, green spaces, parks, and associated vegetation can increase their climate resilience and the benefits Californians derive from them. Urban forests have a significant potential to sequester carbon. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. |

**Table 5.8-6 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies**

| 2022 Scoping Plan Actions and Strategies | Responsible Party(ies) | Consistency |
|---|---|---|
| **Natural and Working Lands: Vegetated Lands** | | |
| • Establish and expand mechanisms that ensure sparsely vegetated lands are protected from land conversion, prioritizing those areas most vulnerable to climate change and loss. | State agencies and local agencies | **Consistent**. Vegetated lands include deserts, beaches, dunes, bare rock, and areas covered in ice and snow. Vegetated lands provide limited carbon storage, but nonetheless, are important for open space, unique habitats, and recreational opportunities. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the County. Thus, this strategy is not directly related to future development facilitated by adoption of the WSAP. However, the WSAP would not interfere, impede, or conflict with strategies on any NWL where vegetated lands occur under the 2022 Scoping Plan. |

Source: CARB 2022.

### *SCAG's Regional Transportation Plan / Sustainable Communities Strategy*

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The regional transportation network envisioned in Connect SoCal would reduce per-capita GHG emissions related to vehicular travel associated with the proposed project and assist in meeting the GHG reduction per capita targets for the SCAG region (SCAG 2024).

The Connect SoCal Plan does not require that local general plans, proposed projects, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The purpose of the 2024–2050 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2024–2050 RTP/SCS, certified on May 7, 2020, states that "[e]ach [metropolitan planning organization] is required to prepare an SCS as part of their RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375" (SCAG 2024). The 2024–2050 RTP/SCS seeks improved mobility and accessibility, which is defined as "the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices" (SCAG 2024) The 2024–2050 RTP/SCS seeks to implement a strategy that "alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to

high-quality transportation" (SCAG 2024). Furthermore, the 2024–2050 RTP/SCS includes "more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth" and "accommodate increases in population, households, employment, and travel demand" (SCAG 2024). Moreover, the 2024–2050 RTP/SCS states that while "[t]ransportation emissions are most prevalent relative to all other sectors in California and specifically in the SCAG region," the RTP/SCS would focus "growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions" (SCAG 2024).

In order to assess the WSAP's potential to conflict with the 2024–2050 RTP/SCS, this section analyzes the WSAP's consistency with the strategies and policies in the 2024–2050 RTP/SCS to meet GHG emission-reduction targets set by CARB. Generally, projects are considered to not conflict with applicable County and regional land use plans and regulations, such as SCAG's 2024–2050 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The WSAP would not conflict with the 2024–2050 RTP/SCS goals, as detailed in Table 5.8-7, *Consistency with2024–2050 SCAG RTP/SCS Goals*.

**Table 5.8-7 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| **Mobility:** Build and maintain an integrated multimodal transportation network. | Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. | **Consistent:** The proposed Project includes a Mobility Element that outlines policies to improve mobility within the Planning Area. The Mobility Element supports the use of alternative modes of transportation, including walking, bicycling, and transit, to increase access opportunities and community connectivity (WSAP Goal M 4) and reduce impacts of traffic-related emissions (WSAP Goal M 5 and Policy LU 3.3). The Mobility Element also includes policies related to improving pedestrian and bicycle safety and reducing other transportation-related safety hazards (WSAP Policies M 1.2, M 1.3, M 1.6, M 2.1, M 2.3, M 4.1, M 4.8, M 4.10, and LU 3.4). |
| | Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. | **Consistent:** The WSAP would place growth near planned or existing transit stations and areas, commercial retail service areas, and active transportation corridors. For example, WSAP Policies M 3.1, LU 2.2, and LU 3.3 would encourage development in proximity to active transportation corridors. Additionally, the County's Bicycle Master Plan identifies several bicycle |

**Table 5.8-7 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| | | improvements within the Planning Area, and the Mobility Element would support these improvements by identifying locations where infrastructure remains disconnected between jurisdictions (WSAP Goal M 4). Furthermore, Policy M 3.3 encourages convenient and safe transit, pedestrian, and bicycle linkages to/from transit service and mobility hubs and improving first/last-mile connections to Metro K Line stations, including Hyde Park, Leimert Park, and Martin Luther King Jr stations. |
| | Support planning for people of all ages, abilities and backgrounds. | **Consistent:** The WSAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors. |
| **Communities:** Develop, connect, and sustain livable and thriving communities. | Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. | **Consistent.** The proposed Project would increase residential and mixed-use densities within major commercial corridors and centers and along high-quality transit corridors (see Figure 3-4, *Proposed Land Uses*, of this Draft PEIR). |
| | Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households. | **Consistent.** The proposed Project supports a variety of housing types, including High Density Residential and mixed-use development to encourage better connectivity to employment and commercial uses. Policies LU-2.1 through LU 2.6, LU 4.1 through LU-4.3, LU-6.1 through LU-6.7 encourage a balanced land use pattern, a diversity of housing types, jobs-housing balance, and transit-oriented development. Therefore, the proposed Project would be consistent with this policy. |
| **Environment:** Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region. | Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. | **Consistent:** The WSAP includes Goal COS 4, which focuses on improving resiliency and minimizing contributions to climate change. Policy COS 4.1 encourages new and existing developments to upgrade to water-conserving mechanisms such as stormwater capture systems, graywater systems, and drought tolerant landscapes. Additionally, the WSAP also includes Goal LU 9 that |

**Table 5.8-7 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| | | focuses on a safe built environment and infrastructure. Under Policy LU 9.1, new developments should be designed and located to protect structures and occupants from natural hazards such as flooding and landslides. Additionally, Policy LU 9.3 calls for proactive management of vegetation in fire hazard areas. |
| | Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water. | **Consistent:** The proposed Project objectives include focusing new housing and commercial development in existing commercial corridors and centers and in proximity to transit; prioritizing local serving businesses; fostering land use development patterns and densities and improving streetscapes that promote a more active pedestrian environment; and improving the variety of travel choices for residents such as walking, biking, and public transit. The WSAP includes Policies LU 3.1, LU 4.3, LU 5.2, LU 6.7, LU 12.1, LU 13.5, and LU 14.6 in addition to Policies M 3.1, M 3.3, M 4.4, and M 4.12 to support these objectives. Overall, these components of the proposed Project would contribute to building denser communities and improving active and public transit infrastructure and contribute to reducing passenger vehicle trips, thereby also potentially reducing VMT and overall transportation fuel demands and mobile-source criteria air pollutant and GHG emissions. |
| | Conserve the region's resources. | **Consistent.** The proposed Project contains several policies in the Land Use and Conservation and Open Space element that would preserve and enhance areas that may provide habitat for special-status species (LU-8.1, COS-2.1 through COS 2.3). Therefore, the proposed Project would be consistent with this policy. |
| **Economy:** Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region. | Improve access to jobs and educational resources. | **Consistent:** The WSAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors. Additionally, |

**Table 5.8-7 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| | | the proposed Project would increase mixed-use densities. This proposed land use development pattern and approach would contribute to increasing local employment opportunities and is supported by WSAP Policies LU 3.1 and LU 5.10. Furthermore, the Economic Development Element of the WSAP includes Goal ED 3, which supports equitable jobs access. |
| | Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. | **Not Applicable:** The Mobility Element of the WSAP focuses on further development of a multimodal transportation network that would accommodate efficient automobile, public transit, and active transit movement. It emphasizes improving access to public transit and improving the active transit network in addition to improving overall street system safety. While the WSAP does not have specific emphasis on goods movement system, improvement to street system safety (see Impact 5.17-3 of this Draft PEIR) would generally benefit efficient vehicle movement. |

Source: SCAG 2024.

### *Los Angeles County General Plan*

The General Plan provides the policy framework for establishing the long-range vision for the growth and development of unincorporated areas within the County, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. The General Plan identifies a total of 11 geographically delineated Planning Areas, one of which is the Westside Planning Area. The County creates area plans for each planning area that focus on land use and policy issues specific to each geographical area, providing a mechanism to draft policies and programs that respond to the unique and diverse character of local communities. Upon adoption, the WSAP would become part of the General Plan. As a component of the General Plan, the WSAP would be guided by and consistent with the following Guiding Principles of the General Plan, including those principles related to smart growth and providing healthy, livable, and equitable communities:

- **Employ Smart Growth.** Shape new communities to align housing with jobs and services; and protect and conserve the County's natural and cultural resources.

- **Ensure community services and infrastructure are 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.
- **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.
- **Promote excellence in environmental resource management.** Carefully manage the County's natural resources in an integrated way that is both feasible and sustainable.
- **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.

The WSAP would not conflict with the Los Angeles County General Plan.

### *OurCounty Sustainability Plan*

The WSAP would align with the vision and goals of the OurCounty Sustainability Plan, specifically the following that reduce GHG emissions: equitable and sustainable land use and development without displacement; provide opportunities for all residents and businesses and supports the transition to a green economy; a fossil fuel-free LA County; convenient, safe, clean, and affordable transportation system that enhances mobility while reducing car dependency. The WSAP would not conflict with the OurCounty Sustainability Plan.

### *CALGreen Code and Los Angeles County Green Building Ordinance*

The WSAP would be consistent with the requirements of the CALGreen Code and LA County Green Building Ordinance, which include building energy and water efficiency improvements. The WSAP would implement both new and existing building energy efficiency improvements, such as electrifying new buildings, increasing production of renewable energy, improving the energy efficiency of buildings, reducing indoor and outdoor water consumption, and increasing the use of gray and recycled water, as required, as future development is constructed. The WSAP would not conflict with the code requirements of the CALGreen Code and LA County's Green Building Ordinance.

## Summary

As shown in Table 5.8-5, the WSAP would result in an increase in GHG emissions in the plan area. However, the County has adopted the 2045 CAP, which would ensure that GHG emissions within the unincorporated areas achieve the state GHG reduction goals of SB 32 and AB 1279. Development within the WSAP would adhere to the policies of the WSAP, the County's General Plan, and the measures identified in the 20245 CAP. As a result, implementation of Project would have less than significant project impacts under CEQA Guidelines Section 15183.5. Additionally, future development facilitated by adoption of the WSAP would not conflict with other applicable plan, policy, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant with adherence to, and implementation of, the 2045 CAP.

## 5.8.4 Cumulative Impacts

Analysis of GHG emissions is cumulative in nature as impacts are caused by cumulative global emissions. In addition, climate change impacts related to GHG emissions do not necessarily occur in the same area as a project. The emission of GHGs by a single development project into the atmosphere does not necessarily cause an adverse environmental effect. Rather, it is the increased accumulation of GHGs from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change.

Consistent with CEQA Guidelines Section 15064(h)(3), the County, as lead agency, has determined that the WSAP's contribution to cumulative GHG emissions and global climate change would be less than significant if the WSAP is consistent with the applicable regulatory plans and policies to reduce GHG emissions. As identified in Impact GHG-1, the WSAP would not conflict with applicable GHG reduction plans, policies, and regulations. Therefore, GHG emissions associated with future development facilitated by adoption of the WSAP would be less than significant on a cumulative basis.

## 5.8.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, some impacts would be less than significant: 5.8-1.

## 5.8.6 Mitigation Measures

No mitigation measures are required.

## 5.8.7 Level of Significance After Mitigation

No significant impacts have been identified requiring mitigation and no significant and unavoidable impacts would occur.

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# 5.9 HAZARDS AND HAZARDOUS MATERIALS

This section addresses the potential impacts of the Westside Area Plan (proposed Project or WSAP) related to hazards and hazardous materials, specifically potential impacts for hazardous releases through routine transport, use or disposal of hazardous materials, significant hazards through upset or accident conditions, emissions of hazards near sensitive uses, location of properties on a list of hazardous sites, airport-related hazards, potential for interference with an emergency evacuation plan, and exposure of people or structures to wildfires. This section describes the physical environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, included in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.9.1 Environmental Setting

### 5.9.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *Resource Conservation and Recovery Act of 1976, with Hazardous and Solid Waste Amendments of 1984*

Federal hazardous waste laws are generally promulgated under the Resource Conservation and Recovery Act (RCRA). These laws provide for the "cradle to grave" regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed. The Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program and California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, California Environmental Protection Agency (Cal/EPA) has in turn delegated enforcement authority to the County for state law regulating hazardous waste producers or generators. The 1986 amendments to RCRA enabled the United States Environmental Protection Agency (USEPA) to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. Some of the other mandates of this law include increased enforcement authority for USEPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.

##### *Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act of 1986*

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no

responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to $8.5 billion.

### *Emergency Planning Community Right-to-Know Act*

The Emergency Planning Community Right-to-Know Act, also known as SARA Title III, was enacted in October 1986. This law requires any infrastructure at the state and local levels to plan for chemical emergencies. Reported information is then made publicly available so that interested parties may become informed about potentially dangerous chemicals in their community. Sections 301 through 312 of the Act are administered by USEPA's Office of Emergency Management. USEPA's Office of Information Analysis and Access implements the Emergency Planning Community Right-to-Know Act Section 313 program. In California, SARA Title III is implemented through the California Accidental Release Prevention Program.

### *Hazardous Materials Transportation Act*

Transportation of hazardous materials is regulated by the U.S. Department of Transportation's Office of Hazardous Materials Safety. The office formulates, issues, and revises hazardous materials regulations under the Federal Hazardous Materials Transportation Law. The hazardous materials regulations cover hazardous materials definitions and classifications, hazard communications, shipper and carrier operations, training and security requirements, and packaging and container specifications. The hazardous materials transportation regulations are codified in 49 Code of Federal Regulations (CFR) Parts 100–185.

The hazardous materials transportation regulations require carriers transporting hazardous materials to receive training in the handling and transportation of hazardous materials. Training requirements include pre-trip safety inspections, use of vehicle controls and equipment including emergency equipment, procedures for safe operation of the transport vehicle, training on the properties of the hazardous material being transported and loading and unloading procedures. All drivers must possess a commercial driver's license as required by 49 CFR Part 383. Vehicles transporting hazardous materials must be properly placarded. In addition, the carrier is responsible for the safe unloading of hazardous materials at the site, and operators must follow specific procedures during unloading to minimize the potential for an accidental release of hazardous materials.

### *Occupational and Safety Health Act*

The Occupational Safety and Health Administration (OSHA) is responsible at the federal level for ensuring worker safety. OSHA sets federal standards for implementing workplace training, exposure limits, and safety procedures for the handling of hazardous substances and hazardous materials (as well as other hazards). OSHA also establishes criteria by which each state can implement its own health and safety program.

### *Federal Response Plan*

The Federal Response Plan of 1999, as amended in 2003 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

### *International Fire Code*

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

### *Code of Federal Regulations – Title 40*

Title 40 CFR Part 273 governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 CFR Part 112 requires the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan if oil is stored in excess of 1,320 gallons in aboveground storage (or have a buried capacity of 42,000 gallons). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 CFR Part 61 established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos-containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by USEPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

### *Regional Screening Levels (RSLs)*

The federal USEPA provides regional screening levels for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the USEPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are

present to warrant further investigation. In California, the DTSC Human and Ecological Risk Office (HERO) incorporated the USEPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the USEPA RSLs. The DTSC-SL should be used in conjunction with the USEPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

### *Federal Aviation Administration*

Title 14 CFR Part 77 establishes requirements for notifying the Federal Aviation Administration (FAA) of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

## State Laws, Regulations, and Policies

### *California Health and Safety Code and Code of Regulations*

California Health and Safety Code (HSC) Chapter 6.95 and 19 California Code of Regulations (CCR) Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous materials chemical inventory disclosing hazardous materials stored, used, or handled on site. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities.

HSC Section 25501 states that a "hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment.

The transport of hazardous waste materials is further governed by California Health and Safety Code Section 25163 and Title 22, Chapter 13, of the CCR. Specifically, Section 25163 of the Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his/her possession while transporting hazardous waste. Additionally, Title 22, Chapter 13, of the CCR includes a number of requirements, which include, but are not limited to, the requirement to receive an identification number and a registration certificate from DTSC; requirement to obtain a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter prior to accepting hazardous wastes; and delivery of hazardous waste to authorized facilities only.

### *California Environmental Protection Agency*

Cal/EPA was created in 1991 by the Governor's Executive Order W-5-91. Several state regulatory boards, departments, and offices were placed under the Cal/EPA umbrella to create a cabinet-level voice for the protection of human health and the environment and to assure the coordinated deployment of state resources. Among those responsible for hazardous materials and waste management are DTSC, Department of Pesticide Regulation, and Office of Environmental Health Hazard Assessment. Cal/EPA also oversees the unified hazardous waste and hazardous materials management regulatory program (Unified Program).

### *California Department of Toxic Substances Control*

The California DTSC, which is a department of Cal/EPA, is authorized to carry out the federal RCRA hazardous waste program in California to protect people from exposure to hazardous wastes. The department regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 California Code of Regulations [CCR] Divisions 4 and 4.5). Permitting, inspection, compliance, and corrective action programs ensure that people who manage hazardous waste follow state and federal requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

### *California Geologic Energy Management Division*

The California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources (DOGGR), provides oversight of the oil, natural gas, and geothermal industries in California. CalGEM requires that prior to commencing any work to abandon any oil/gas well, the owner or operator must request approval from CalGEM. Inactive and deserted oil and gas wells that are not maintained (i.e., "idle wells") can pose threats to groundwater and public safety (DOC 2022).

Idle well regulations were revised in April 2019 to create more stringent testing requirements that better protect public safety and the environment from the potential threats posed by idle wells. The regulations require idle wells to be tested and, if necessary, repaired, or permanently sealed and closed. If an operator becomes insolvent or deserts their idle wells, responsibility for permanently sealing and closing these wells may fall to the state. Since 1977, CalGEM has plugged and abandoned approximately 1,400 wells at a cost of $29.5 million (DOC 2022). To reduce the number of idle wells for which the state may become responsible, legislative and regulatory changes have been made to create incentives for operators to manage and eliminate their idle wells by entering into Idle Well Management Plans (IWMPs). If an operator does not have an IWMP, the operator must pay annual idle well fees. In 2018, CalGEM collected approximately $4.3 million in idle well fees (DOC 2022). These fees are deposited into the Hazardous and Idle-Deserted Well Abatement Fund to help fund the permanent sealing and closure of deserted wells (DOC 2022).

### *California Building Code*

The State of California provides a minimum standard for building design through the 2022 California Building Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations. Part 2 of the 2022 CBC is a fully integrated code based on the 2021 International Building Code. It is generally adopted on a jurisdiction by-jurisdiction basis, subject to further 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.

### *California Accidental Release Prevention Program (CalARP)*

The CalARP Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit a Risk Management Plan to the local CUPA. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. 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. The CalARP Program meets the requirements of the USEPA Risk Management Program, which was established pursuant to the Clean Air Act amendments. Based on Los Angeles County Fire Department online records, six sites within the Planning Area are active CalARP facilities (LACoFire 2022).

### *California Division of Occupational Safety and Health (Cal/OSHA)*

Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials (8 CCR, Section 1529). Among other requirements, Cal/OSHA requires entities handling specified amounts of certain hazardous chemicals to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead. OSHA applies to this Project because contractors will be required to comply with its handling and use requirements that would increase worker safety and reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

### *California Department of Forestry and Fire Protection*

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. CAL FIRE provides fire assessment and firefighting services for land in State Responsibility Areas (SRA), conducts educational and training programs, provides fire planning guidance and mapping, and reviews general plan safety elements to ensure compliance

with State fire safety requirements. CAL FIRE staff, or a designee, also reviews building permit applications, parcel maps, and use permits for construction or development in SRAs and Local Responsibility Areas (LRA).

The Board of Forestry and Fire Protection is a government-appointed approval body within CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of CAL FIRE, and representing the state's interest in federal forestland in California. The Board of Forestry and Fire Protection also promulgates regulations and approves general plan safety elements that are adopted by local governments for compliance with State statutes.

The California Office of the State Fire Marshal supports the mission of CAL FIRE by focusing on fire prevention. These responsibilities include regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention within wildland areas; regulating hazardous liquid pipelines; developing and renewing regulations and building standards; and providing training and education in fire protection methods and responsibilities. These are accomplished through major programs, including engineering, education, enforcement, and support from the Board of Forestry and Fire Protection. For jurisdictions in SRAs or very high fire hazard severity zones (FHSZ), the Land Use Planning Program division of the Office of State Fire Marshal reviews safety elements during the update process to ensure consistency with California Government Code, Section 65302(g)(3).

Together, the Board of Forestry and Fire Protection, Office of State Fire Marshal, and CAL FIRE protect and enhance the forest resources of all wildland areas of California that are not under federal jurisdiction.

### *Fire Hazard Severity Zones and Responsibility Areas*

CAL FIRE designates FHSZs as authorized under California Government Code Sections 51175 et seq. FHSZs may be designated Very High, High, or Moderate. CAL FIRE considers many factors when designating FHSZs, including fire history, existing and potential vegetation fuel, flame length, blowing embers, terrain, and weather patterns for the area. CAL FIRE designates FHSZs in two types of areas depending on which level of government is financially responsible for fire protection.

- **Local Responsibility Area (LRA).** Incorporated communities are financially responsible for wildfire protection.
- **State Responsibility Area (SRA).** CAL FIRE and contracted counties are financially responsible for wildfire protection.

### *CAL FIRE Strategic Fire Plan*

CAL FIRE produced the 2018 *Strategic Fire Plan for California*, with goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments (CAL FIRE 2018). The 2018 Strategic Plan focuses on fire prevention and suppression activities to protect lives, property, and ecosystems in addition to providing natural resource management to maintain state forests as a resilient carbon sink to meet California's climate change goals. A key component of the 2018 *Strategic Fire Plan for California* is the

collaboration between communities to ensure fire suppression and natural resource management is successful (CAL FIRE 2018).

### *State Responsibility Area and Very High Fire Hazard Severity Zone Fire Safe Regulations*

California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7, Subchapter 2, *SRA/Very High FHSZ Fire Safe Regulations*, establishes minimum wildfire protection standards for construction and development in the SRA and Very High FHSZ and requires CAL FIRE to review development proposals and enact recommendations that serve as conditions of approval in these zones. These regulations apply to all residential, commercial, and industrial buildings in the SRA and Very High FHSZ and all tentative and parcel maps. These standards include basic emergency access and perimeter wildfire protection measures, signing and building numbering, private water supply resources for emergency fire use, and vegetation modification. Fire Safe Regulations also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road. Section 1273.08, *Dead-End Roads*, of these standards provides regulations for the maximum lengths of single-access roadways:

- Parcels zoned for less than one acre: 800 feet
- Parcels zoned for 1 acre to 4.99 acres: 1,320 feet
- Parcels zoned for 5 acres to 19.99 acres: 2,640 feet
- Parcels zoned for 20 acres or larger: 5,280 feet

Fire Safe Regulations, Section 1299.03, *Fire Hazard Reduction Around Buildings and Structure Requirements*, provides defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2). In Zone 1, all dead and dying plants must be removed, as must any vegetation that could catch fire. In Zone 2, horizontal and vertical spacing among shrubs and trees must be created and maintained.

### *California Fire Code*

The CFC incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in 24 CCR Part 9, and like the CBC, is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The County of Los Angeles regularly adopts each new CFC update under County Code of Ordinances Title 32, *Fire Code*. The CFC is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all 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 wildfire hazard areas.

### *California Emergency Services Act*

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the USEPA, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

### *Asbestos-Containing Materials Regulations*

State-level agencies, in conjunction with USEPA and the Occupational Safety and Health Administration, regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed 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.

The California Air Resources Board (CARB) is responsible for overseeing compliance with the federal Asbestos NESHAP in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal NESHAP regulation for asbestos and investigates all related complaints, as specified by California Health and Safety Code (HSC) Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these "non-delegated" districts, a demolition/renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) CARB reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and USEPA to facilitate communication and enforcement continuity and assists USEPA in training district staff to enforce the asbestos NESHAP.

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

### *Polychlorinated Biphenyls*

The USEPA prohibited the use of polychlorinated biphenyls (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 (15 US Code Section 2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and 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 of accordingly. At lower concentrations for non-liquids, Regional Water Quality Control Boards may exercise discretion over the classification of such wastes.

### *Lead-Based Paint*

California Occupational Safety and Health Administration's Lead in Construction Standard is contained in Title 8, Section 1532.1, of the California Code of Regulations. The regulations address all of the following areas: 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.

### *Environmental Screening Levels*

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board (RWQCB); however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination.

### *DTSC Human and Ecological Risk Office Screening Levels*

DTSC screening levels were derived from the USEPA RSLs using DTSC-modified exposure and toxicity factors for constituents in soil, tap water, and ambient air. The DTSC screening levels should be used in conjunction with the USEPA RSLs and RWQCB ESLs to evaluate chemical concentrations in environmental media at California sites and facilities.

## Regional Laws, Regulations, and Policies

There are no regional laws, regulations, and/or policies that are specifically applicable to hazards and hazards materials.

## Local Laws, Regulations, and Policies

### *Los Angeles County General Plan (General Plan)*

#### *Safety Element*

The purpose of the Safety Element of the General Plan is to reduce the potential risk of death, injuries, and economic damage resulting from natural and man-made hazards. The Safety Element works in conjunction with the Operational Area Emergency Response Plan (OAERP), which is prepared by the County's Chief Executive Office – Office of Emergency Management (CEO OEM). CEO OEM also prepares the All-Hazard Mitigation Plan, which provides policy guidance for minimizing threats from natural and man-made hazards and has been approved by FEMA and California Emergency Management Agency (CalEMA). The Safety Element includes policies for fire-related land use and building regulations in Los Angeles County, including policies that specifically pertain to properties in Very High Fire Hazard Severity Zones. The Safety Element also includes policies for emergency response within the County. Emergency services within the County are provided by the County Fire Department and Sheriff's Department, in cooperation with local agencies. The

Safety Element provides the following goals and policies potentially relevant to the proposed Project (County of Los Angeles 2021):

**Goal S 4:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.

- **Policy S 4.1.** Prohibit new subdivisions in VHFHSZs unless: (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other FHSZs.

- **Policy S 4.3.** Ensure that biological and natural resources are protected during rebuilding after a wildfire event.

- **Policy S 4.4.** Reduce the risk of wildland fire hazards through meeting minimum State and local regulations for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.

- **Policy S 4.6.** Ensure that infrastructure requirements for new development meet minimum State and local regulations for ingress, egress, peak load water supply availability, anticipated water supply, and other standards within FHSZs.

- **Policy S 4.8.** Support the retrofitting of existing structures in FHSZs to meet current safety regulations, such as the building and fire code, to help reduce the risk of structural and human loss due to wildfire.

- **Policy S 4.14.** Encourage the strategic placement of structures in FHSZs that conserves fire suppression resources, increases safety for emergency fire access and evacuation, and provides a point of attack or defense from a wildfire.

- **Policy S 4.16.** Require local development standards to meet or exceed SRA Fire Safe Regulations, which include visible home and street addressing and signage and vegetation clearance maintenance on public and private roads; all requirements in the California Building Code and Fire Code; and Board of Forestry Fire Safe Regulations.

- **Policy S 4.18.** Require Fire Protection Plans for new residential subdivisions in FHSZs that minimize and mitigate potential loss from wildfire exposure and reduce impact on the community's fire protection delivery system.

- **Policy S 4.20.** Prohibit new and intensification of existing general assembly uses in VHFHSZs unless: (1) the use is located in an existing approved specific plan or (2) the County determines there is sufficient

secondary egress and the County determines the adjoining major highways and street networks are sufficient for evacuation, as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new general assembly uses in all other FHSZs.

**Goal S 7:** Effective County emergency response management capabilities

- **Policy S 7.1.** 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 7.2.** Support County emergency providers in reaching their response time goals.
- **Policy S 7.3.** Coordinate with other County and public agencies, such as transportation agencies and health care providers, on emergency planning and response activities, and evacuation planning.
- **Policy S 7.4.** Encourage the improvement of hazard prediction and early warning capabilities.
- **Policy S 7.5.** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- **Policy S 7.6.** Ensure that essential public facilities are maintained during disasters, such as flooding, wildfires, extreme temperature and precipitation events, drought, and power outages.
- **Policy S 7.7.** Locate essential public facilities, such as hospitals, where feasible, outside of hazard zones identified in the Safety Element to ensure their reliability and accessibility during disasters.
- **Policy S 7.8.** Adopt by reference the County of Los Angeles All-Hazards Mitigation Plan, as amended.
- **Policy S 7.9.** Work cooperatively with public agencies with responsibility for flood and fire protection, and with stakeholders in planning for flood and fire hazards.

*Land Use Element*

The Land Use Element of the General Plan provides the following goals and policies potentially relevant to the proposed Project (County of Los Angeles 2015):

**Goal LU 1:** A General Plan that serves as the constitution for development and a Land Use Policy Map that implements the General Plan's Goals, Policies and Guiding Principles.

- **Policy LU 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 LU 1.6.** In the review of a project-specific amendment(s) to convert lands within the Employment Protection District Overlay to non-industrial land use designations, ensure that the project- specific amendment(s)

- Is located on a parcel that adjoins a parcel with a comparable use, at a comparable scale and intensity;
- Will not negatively impact the productivity of neighboring industrial activities;
- Is necessary to promote the economic value and the long-term viability of the site; and
- Will not subject future residents to potential noxious impacts, such as noise, odors or dust or pose significant health and safety risks.

**Goal LU 3:** A development pattern that discourages sprawl and protects and conserves areas with natural resources and significant ecological areas.

- **Policy LU 3.2.**Discourage development in areas with high environmental resources and/or severe safety hazards.

**Goal LU 7:** Compatible land uses that complement neighborhood character and the natural environment.

- **Policy LU 7.6.** Ensure that proposed land uses located within Airport Influence Areas are compatible with airport operations through compliance with airport land use compatibility plans.

- **Policy LU 7.7.** Review all proposed projects located within Airport Influence Areas for consistency with policies of the applicable airport land use compatibility plan.

*Air Quality Element*

The Air Quality Element of the General Plan provides the following goals and policies potentially relevant to the proposed Project (County of Los Angeles 2015):

**Goal AQ 1:** Protection from exposure to harmful air pollutants.

- **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.

### *California Fire Code*

The CFC incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in 24 CCR Part 9, and like the CBC, is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The County of Los Angeles regularly adopts each new CFC update under County Code of Ordinances Title 32, *Fire Code*. The CFC is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all 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 wildfire hazard areas.

### *County of Los Angeles All-Hazards Mitigation Plan*

The purpose of hazard mitigation planning is to reduce the loss of life and property by minimizing the impact of disasters. The *County of Los Angeles All-Hazards Mitigation Plan* (HMP) was prepared and adopted in May 2020 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The HMP includes an assessment of hazards and vulnerabilities, and a set of mitigation actions for the County. In the context of an HMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. The HMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations, and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide.

### *County of Los Angeles Operational Area Emergency Operations Plan*

The County of Los Angeles Office of Emergency Management is responsible for coordinating agency response to disasters or other large-scale emergencies in the county. The *County of Los Angeles Operational Area Emergency Operations Plan* (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination, procedures to maintain communications with regional and State emergency response teams, and methods to assess the extent of damage and management of volunteers, as well as identifies the location of Emergency Operations Centers. The EOP uses the Standardized Emergency Management System as required by California Government Code Section 8607(a) for managing responses to multiagency and multi-jurisdictional emergencies in California, including those related to hazardous materials.

### *Los Angeles County Fire Department 2020 Strategic Fire Plan*

The *Los Angeles County Fire Department 2020 Strategic Fire Plan* provides an overview of the fire landscape within Los Angeles County, in both incorporated and unincorporated areas. The plan also provides pre-fire management strategies and tactics to reduce the risk of fire affecting people and structures. These strategies include fire prevention, vegetation management, a robust fire protection system, and individuals division and battalion program plans. The plan also provides a list of pre-fire projects conducted from 2016 through 2020 to reduce wildfire risk throughout the county.

### *Community Standards Districts*

#### *Baldwin Hills Community Standards District (CSD)*

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible

with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021 Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

Additionally, the Multiple Agency Coordination Committee (MACC) was established to coordinate activities between the various agencies with regulatory authority over oil operations within the CSD. The agencies included in the MACC include:

- County of Los Angeles,
  - Department of Regional Planning
  - Fire Department
  - Department of Public Works
  - Department of Public Health
- Culver City
- State of California
  - CalGEM
  - RWQCB
  - South Coast Air Quality Management District

### 5.9.1.2 EXISTING CONDITIONS

As discussed in Chapter 4, *Environmental Setting*, of this Draft PEIR, the proposed Project's 12 Opportunity Sites and Inglewood Oil Field are disturbed and/or developed and are within urbanized areas of the Planning Area. Most of the 12 Opportunity Sites are developed with a range of uses including commercial, church, single-family residential, multi-family residential, and parking lot. The Inglewood Oil Field is a privately owned and active oil field with pumps, tanks, ancillary equipment, energy infrastructure, access roads and other facilities within the Ladera Heights community. A discussion of hazards and hazardous materials within the Planning Area is provided below.

**Hazardous Materials**

Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or implementing agency has a reasonable basis for believing would be injurious to public health and safety or harmful to the environment if released into the workplace or the environment. Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been discarded, discharged, spilled, or contaminated or are being stored until they can be disposed of properly (CCR Title 22,

Chapter 11, Article 2, Section 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific CCR Title 22 criteria.

Past industrial or commercial activities on a site could have resulted in spills or leaks of hazardous materials to the ground, resulting in soul and/or groundwater contamination. Hazardous materials may also be present in building materials of older structures and released during building demolition activities. If improperly handled, hazardous materials and wastes can cause public health hazards when released to the soil, groundwater, or air. The four basic exposure pathways through which an individual can be exposed to a chemical agent include inhalation, ingestion, bodily contact, and injection. Exposure can come as a result of an accidental release during transportation, storage, or handling of hazardous materials. Disturbance of subsurface soil during construction can also lead to exposure of workers or the public from stockpiling, handling, or transportation of soils contaminated by hazardous materials or waste from previous spills or leaks.

**Hazardous Waste Generators**

The United States Environmental Protection Agency regulates generators of hazardous waste based on the amount of waste generated. Large quantity generators produce 1,000 kilograms or more per month, or more than one kilogram per month of acutely hazardous waste. Small quantity generators produce between 100 and 1,000 kilograms of hazardous waste per month.

**Hazardous Materials Sites**

California Government Code Section 65962.5 directs CalEPA to compile, maintain, and update specified lists of hazardous material release sites. CEQA (California Public Resources Code Section 21092.6) requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the project and any alternatives are identified on any of the following lists:

- **USEPA NPL.** The United States Environmental Protection Agency's National Priorities List includes all sites under the USEPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risks to human health and the environment.

- **USEPA CERCLIS and Archived Sites.** The United States Environmental Protection Agency's Comprehensive Environmental Response, Compensation, and Liability Information System includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.

- **USEPA RCRIS (RCRA Info).** The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.

- **DTSC Cortese List.** DTSC maintains the Hazardous Waste and Substances Sites (Cortese) list as a planning document for use by the State and local agencies to comply with CEQA requirements by providing

information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database.

- **DTSC HazNet.** DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS.** Through the Leaking Underground Storage Tank Information System (LUSTIS), State Water Resources Control Board maintains an inventory of USTs and LUSTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named after the legislator who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources contained on websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the SWRCB's online GeoTracker database. These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency's jurisdiction.

A search of the online EnviroStor and GeoTracker databases identified 11 hazardous materials sites within the Planning Area, as shown in Table 5.9-1, *Hazardous Sites* (SWRCB 2024; DTSC 2024). Ten of the eleven sites are designated as "closed", "completed – case closed", "no action required", or "no further action." One site, the Balwin Hills Conservancy Project (Inglewood Oil Field), is currently active as it has a history of oil drilling.

Approximately 639 acres of the Planning Area are within the Inglewood Oil Field. A release or spill of hazardous materials within these areas may put people and properties in hazardous and dangerous situations. Most hazardous materials in the area are those transported on main roadways through the County.

**Table 5.9-1 Hazardous Sites**

| ID | Site Name | Address | Site Type | Status |
|---|---|---|---|---|
| **SITES LISTED ON ENVIROSTOR** | | | | |
| 60002985 | Baldwin Hills Conservancy Project | South La Cienega Boulevard | State Response | Active |
| 19130114 | Eastern Ridgeline Project | 4100 South La Cienega Boulevard | Evaluation | No Further Action |
| **SITES LISTED ON GEOTRACKER** | | | | |
| T10000000491 | West Los Angeles College | 9000 Overland Drive | LUST Cleanup Site | Case Closed |
| T0603748120 | United #3 | 4700 Slauson Ave | LUST Cleanup Site | Case Closed |
| T10000008161 | Marycrest Manor | 10664 Sant James Drive | LUST Cleanup Site | Case Closed |
| T0603702829 | Slauson Gas & Mart | 3708 Slauson Avenue | LUST Cleanup Site | Case Closed |
| T0603784707 | SCE-La Cienega Substation | 4701 La Cienega Blvd | LUST Cleanup Site | Case Closed |
| T10000011025 | Sentinel Peak Resources-Fairfax Avenue | 5640 South Fairfax Avenue | Cleanup Program Site | Case Closed |

**Table 5.9-1 Hazardous Sites**

| ID | Site Name | Address | Site Type | Status |
|---|---|---|---|---|
| SLT4305048 | Dalton Construction | Slauson Avenue | Cleanup Program Site | Case Closed |
| T0603779109 | Vencor Hospitals Calif Inc | 5525 West Slauson Avenue | LUST Cleanup Site | Case Closed |
| T0603705428 | United Oil #60 | 12401 Jefferson Blvd | LUST Cleanup Site | Case Closed |

Source: SWRCB 2024; DTSC 2024

### Inglewood Oil Field Operations

The Planning Area, although largely urbanized and heavily developed with residential uses, continues to support active oil and/or natural gas production activities. A large portion of the Ladera Heights, View Park, and Windsor Hills area is associated with the Inglewood Oil Field, which is bounded by West Los Angeles College and Culver City to the northwest, Holy Cross Cemetery and Mortuary to the southwest, La Brea Avenue and Kenneth Hahn State Recreation Area to the east, and the Yvonne Burke Sports Complex Baseball Fields. The Inglewood Oil Field is currently the largest urban oilfield in the nation. It is characterized by large open spaces featuring several hundred pumpjacks and appurtenant equipment and uses that are visible from adjacent areas. The oil field has been in operation since 1924; however, the County of Los Angeles Department of Regional Planning has started the process to prohibit drilling of new oil wells and to phase out existing operations over the next 20 years, through the BHCSD Amendment.

### Airports

Los Angeles International Airport (LAX) is the primary international airport that serves the Planning Area. It is located at the south end of the Planning Area, approximately four miles south of Marina del Rey and approximately five miles south of Ladera Heights, View Park and Windsor Hills. The City of El Segundo is located to the south of LAX and the City of Inglewood is located to the east. LAX is operated by Los Angeles World Airports (LAWA) covering 3,500 acres of land. Primary access to LAX is via Interstate (I-) 405, I-10 and State Route (SR) 1. LAX also operates several shuttle routes that connect to the airport area.

### Wildfires

The geography, weather patterns, and vegetation in several portions of the Planning Area and surrounding areas provide ideal conditions for recurring wildfires. There have been six major named fires within the Planning Area (CAL FIRE 2023). As shown in Chapter 5.20, Figure 5.20-1, *Fire Hazard Severity Zones*, the communities of Franklin Canyon and Ladera Heights, View Park, and Windsor Hills are within a Very High Fire Hazard Severity Zones. Fire protection services are under the Los Angeles County Fire Department (LACFD). There are four fire stations that provide fire and emergency medical services in the Planning Area.

**Emergency Response Planning**

The emergency response plan for the Planning Area is the County of Los Angeles Operational Area Emergency Response Plan (LA County 2023). The Operational Area Emergency Response Plan strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in the County. The Planning Area Evacuation routes are designated roadways that allow many people to quickly leave an area due to a potential or imminent disaster. These routes should have sufficient capacity to accommodate the needs of the community, be safely and easily accessible, and allow people to travel far enough away to be safe from emergency conditions. The primary evacuation routes in the Planning Area include I-405, I-10, and State Route (SR) 90. The Safety Element of the General Plan identifies limited egress within Ladera Heights, Franklin Canyon and Marina Del Rey (County of Los Angeles 2022). Limited egress is not an indicator that an entire community is affected, it may only contain as few as one residential development with limited egress. The Emergency Response Action Plan (ERAP) specifically outlines emergency responses, including evacuation procedures and diagrams regarding oil operations applicable to the Inglewood Oil Field (SPRC 2022).

## 5.9.2 Thresholds of Significance

According to Appendix G of the CEQA Guideline and County practices, a project would normally have a significant effect on the environment if the project would:

H-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

H-2 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.

H-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of sensitive land uses.

H-4 Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

H-5 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 result in a safety hazard or excessive noise for people residing or working in the project area.

H-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

H-7 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; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within

proximity to land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard.

## 5.9.3 Environmental Impacts

### 5.9.3.1 METHODOLOGY

Evaluation of impacts related to hazards and hazardous materials is based on a review of existing policies, documents, and studies that address these services in the County. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.9.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.5.** Anticipate and plan for the long-term redevelopment of the Inglewood Oil Field and ensure that future uses are integrated and connected to the existing community.

**Goal LU 9:** A safe built environment and infrastructure

- **Policy LU 9.1.** Ensure that new development is located and designated to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).
- **Policy LU 9.2.** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation while still operational as necessary to protect adjoining neighborhoods and uses.
- **Policy LU 9.3.** Proactively manage vegetation in fire hazard areas.

**Goal LU 22 (Inglewood Oil Field).** Redevelopment of the Inglewood Oil Field with Uses Contributing to the Quality of Life of Community Residents

- **Policy LU 22.1.** Support the abatement of existing oil operations and redevelopment for uses that complement and are integrated with existing neighborhoods and districts.
- **Policy LU 22.3.** Enable the community to be actively involved in the determining and planning for uses to be developed as replacement of existing Oil Field operations.
- **Policy LU 22.4.** Provide for the linkage of new uses to the existing community with pedestrian and bicycle paths, greenways, and other elements.

- **Policy LU 22.5.** Provide for the restoration of native vegetation and landscapes and integrate with development.

### Conservation Element

**Goal COS 3:** The Inglewood Oil Field is transformed into a public and environmental asset.

- **Policy COS 3.1.** Incorporate open space preservation, habitat restoration, and the provision of new recreational opportunities into plans for the future re-use of the Inglewood Oil Field.
- **Policy COS 3.2.** Ensure that future use of the Inglewood Oil Field is linked with adjoining recreational areas, trails, residential neighborhoods, and commercial/mixed use districts for the enjoyment of County residents.
- **Policy COS 3.3.** When feasible, restore native species vegetation of the Inglewood Oil Field to provide new habitats for special status species (rare, threatened, or endangered) that may be found on-site.

## 5.9.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.9.1: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? [Threshold G-1]**

**Less Than Significant Impact.** The WSAP is a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment within the Planning Area at densities and intensities higher than currently exist. Future construction activities associated with the implementation of the WSAP could involve the use of standard construction equipment, which would include the following commonly used hazardous materials and substances: fuel, oils and lubricants, hydraulic fluid, paints and thinners, and cleaning solvents to maintain vehicles and motorized equipment. Routine use of any of these substances could pose a hazard to people or the environment if construction activities are not regulated. Similarly, the transport, storage, or disposal of these commonly used hazardous materials during construction activities could cause a significant impact if they are exposed to people or the environment. The use, storage, transport, and disposal of hazardous materials during construction and operation of the future projects would be carried out in accordance with federal, state, and county regulations.

For instance, contractors would be required to prepare and implement Hazardous Materials Business Plans (HMBPs) that requiring hazardous materials used for construction be used properly and stored in appropriate containers with secondary containment, as needed, to contain a potential release. HMBPs are also required for future developments that would include the use, storage, or disposal of hazardous materials on-site. The California Fire Code would also require measures for the safe storage and handling of hazardous materials during construction and operation of the Project. Construction contractors would be required to prepare Storm Water Pollution Prevention Plan (SWPPP) for construction activities according to the National Pollutant

Discharge Elimination System (NPDES) General Construction Permit requirements. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, equipment and fuel storage; protocols for responding immediately to spills; and describe BMPs for controlling site run-on and runoff.

Regarding the Inglewood Oil Field, the BHCSD is a stringent set of regulations, monitoring, notification, and outreach requirements governing the operation, maintenance, and decommissioning of the oil field. The purpose of these regulations is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of such operations, to regulate such operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. Compliance with these regulations, as well as the policies set forth in the WSAP regarding future transition of uses at the Inglewood Oil Field, ensure that this land use would not create significant hazards to the public or the environment.

Compliance with applicable federal, State, and local laws and regulations, including the BHCSD would ensure that any impact resulting from future projects implementing the WSAP's goals, policies, strategies, and implementation actions would be less than significant.

**Impact 5.9-2: 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 or waste into the environment? [Threshold G-2]**

**Less Than Significant Impact.** As identified in Table 5.9-1, a search of the online EnviroStor and GeoTracker databases identified eleven hazardous materials sites within the County (SWRCB 2024; DTSC 2024). Ten sites are designated as "closed," "completed – case closed," "no action required," or "no further action" and one site, the Balwin Hills Conservancy Project (Inglewood Oil Field), is designated active. LA County Planning has started the process to prohibit new oil wells and to phase out existing operations, and all activities are subject to the stringent requirements set forth by the BHCSD. In addition, Policy LU 9.2 of the WSAP would ensure the monitoring of pollution or other impacts related to the oil field. Development on other sites in the County may result in the release of hazardous materials. However, properties contaminated by hazardous substances are regulated at the local, state, and federal level and are subject to compliance with stringent laws and regulations for investigations and remediation. Compliance with the California Code of Regulations, Title 22, and related requirements would remedy all potential impacts caused by hazardous substance contamination. Compliance with applicable federal, state, and local laws and regulations would ensure that any impact regarding the reasonably foreseeable upset or accident release of hazardous materials resulting from future projects implementing the WSAP's goals, policies, strategies, and implementation actions would be less than significant.

**Impact 5.9-3: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of sensitive land uses? [Threshold G-3]**

**Less Than Significant Impact.** Some populations (e.g., children, elderly, sick or disabled persons) are more susceptible to health effects of hazardous materials that the general population. Hazardous materials used near schools, day care centers, senior living communities, hospitals, etc., must consider potential health effects to these populations, often referred to as "sensitive receptors." Construction or redevelopment on contaminated properties that could potentially generate vapors or fugitive dust containing contaminants may potentially pose a health risk to these populations. In addition, commercial businesses in proximity to sensitive receptors may have hazardous emissions or handle hazardous or acutely hazardous materials or wastes that could pose a health risk to these sensitive receptors. It is not known at the time of this analysis whether future projects would be constructed in proximity to one or more sensitive receptor. Typically, developments that would handle hazardous materials or discharge hazardous emissions within one-quarter mile of a sensitive receptor are at risk of exposing sensitive receptors to hazardous materials and emissions. While the WSAP adoption would not directly cause hazardous emissions, it would encourage new developments that could potentially create hazardous emissions. However, the land use and zoning changes proposed in the WSAP are residential or commercial in nature, which are not typically considered to be hazardous land uses. Additionally, any changes to the Inglewood Oil Field would comply with the requirements set forth by the BHCSD and WSAP policy LU 9.2. Compliance with the applicable federal, state, and local laws and regulations would ensure any potential impacts to sensitive receptors from future projects are less than significant.

**Impact 5.9-4: Would the Project be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment? [Threshold G-4]**

**Less Than Significant Impact.** The provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," require the California Department of Toxic Substances Control (DTSC) to compile and maintain a list of Hazardous Waste and Substances sites, including the State Water Resources Control Board's (SWRCB) Leaking Underground Storage Tank (LUST) sites, active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO), and certain solid waste disposal sites and hazardous waste facilities. As discussed in Impact 5.9-2, above, there are eleven hazardous materials sites within the Planning Area. A potentially significant impact could occur if the new future development is located on or near a site listed on the Cortese List and exposed hazardous materials to people or the environment. However, as previously discussed above, there are numerous existing federal, state, and local laws that regulate the use, transportation, storage, and disposal of hazardous materials. These same laws would apply to future developments that are proposed on or near Cortese List sites; applicable laws would require that hazardous materials sites are identified and tested prior to development on such a site, and if contamination exists there are laws that regulate the remediation of the site prior to new development. In addition, sites listed on the Cortese List are under the jurisdiction of a regulatory agency (e.g., DTSC, RWQCB, or a local agency), hence the reason for their inclusion on the Cortese List. As such, the overseeing regulatory agency is in the process of requiring the owners/operators of listed sites to bring their sites into compliance. This includes requiring sites with spills or releases to soil and/or groundwater to investigate and clean up their sites to levels that no longer pose risks to

people or the environment. The listing of a site on the Cortese List is part of the public record. When a future project is proposed, the status of nearby sites on the Cortese List would be checked and the project would be planned accordingly to ensure compliance with any overseeing regulatory agency requirements, as applicable. Compliance with applicable federal, state, and local laws and regulations would ensure that future projects would not create a significant hazard to the public or the environment. Therefore, impacts would be less than significant.

**Impact 5.9-5: Would the Project be 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 result in a safety hazard or excessive noise for people residing or working in the project area? [Threshold G-5]**

**No Impact.** Airport operations and their accompanying safety hazards require careful land use planning on adjacent and nearby lands to protect the residential and business communities from the potential hazards that could be created by airport operations. Pursuant to Section 21096 of the Public Resources Code, the lead agency must consider whether the project would result in a safety hazard for persons using the airport or for persons residing or working in a project area. LAX is the primary domestic and international airport that serves the Planning Area. LAX is located approximately four miles south of Marina del Rey and five miles south of Ladera Heights, View Park, and Windsor Hills. Land uses regarding LAX are under the Los Angeles County Airport Land Use Plan (ALUP) that provides comprehensive planning for compatible uses around County airports. Surround land uses are industrial, commercial, and residential. The ALUP establishes policies regarding safety restrictions and compatibility between aircraft noise and surrounding land uses. Implementation of the proposed Project would not conflict with the ALUP. The Planning Area is not within the vicinity of any airports or within the jurisdiction of an airport land use plan. Therefore, no impacts would occur.

**Impact 5.9-6: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? [Threshold G-6]**

**Less Than Significant Impact.** The emergency response plan for the proposed Project is the County of Los Angeles Operational Area Emergency Response Plan (LA County 2023). The Operational Area Emergency Response Plan strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in Los Angeles County. Emergency evacuation routes within Ladera Heights, View Park, and Windsor Hills include La Cienega Boulevard, Slauson Avenue, La Brea Avenue, Angeles Vista Boulevard, and Stocker Street. Emergency evacuation routes within West Fox Hills include Jefferson Boulevard and Centinela Avenue. The Emergency Response Action Plan (ERAP) specifically outlines emergency responses, including evacuation procedures and diagrams regarding oil operations applicable to the Inglewood Oil Field (SPRC 2022).

Implementation of the proposed Project is not anticipated to result in future development that would alter roadways or otherwise facilitate changes that would result in inadequate emergency access. It is possible that construction activities associated with future projects may result in the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access to and within the Planning Area. Future construction projects would be required to submit construction traffic management plans to the

Los Angeles County Public Works Traffic and Lighting Division for review and approval. Further, future development would need to comply with all applicable building code requirements in the California Building Code, Fire Code, and County Code related to access and design requirements to allow for emergency services to access all structures. With compliance to any requirements deemed necessary for approval of the Traffic and Lighting Division, impacts to emergency access would be less than significant.

**Impact 5.9-7: Would the Project 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; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within proximity to land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard? [Threshold G-7]**

**Less Than Significant Impact.** Wildland fires are uncontrolled fires typically in areas of little to no development, but these fires can spread quickly to the urban/wildland interface where development meets expanses of vegetative fuels. The Planning Area is within a highly urbanized part of Los Angeles County. The biggest open space can be found within the northern portion of Ladera Heights, View Park, and Windsor Hills communities where Kenneth Hahn Recreation Area and the Inglewood Oil Field are located. The Inglewood Oil Field and Kenneth Han Recreation Area are located in a LRA Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2023).

There are no changes to land uses or zoning within the designated VHFHSZ areas, and the implementation of the goals and policies in the WSAP would not result in changes to existing populations and structures that are currently located in or near high fire hazard areas. Additionally, there are adequate water resources to meet emergency demands in this highly urbanized area. Fire hazards associated with the operation of the Inglewood Oil Field are closely monitored through the BHCSD and the numerous regulatory agencies involved in its oversight and implementation of the proposed Project would not change or exacerbate the potential for wildfire conditions in the Inglewood Oil Field or surrounding area.

Future development projects in the Planning Area would go through individual County review and approval processes, to ensure compliance with Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code) and the CBC. Compliance with these required codes would ensure that any new future development proposed in the unincorporated County is in an area with adequate access (for emergency vehicles/personnel) and water pressure (to meet flow standards) in the event that a fire needs to be extinguished. Compliance with the County Fire Code would also ensure that future projects that are developed within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. Therefore, impacts would be less than significant.

## 5.9.4 Cumulative Impacts

The geographic scope of analysis for cumulative hazards and hazardous materials impacts encompasses the Planning Area. While some impacts relative to hazardous materials are generally site-specific and depend on the nature and extent of the hazardous materials release, other impacts, including the transport of hazardous

materials across regional transportation systems and wildfire impacts, have the potential to impact areas outside of the County.

**Impact 5.9.8: Would the Project, when combined with other past, present, or reasonably foreseeable projects create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? [Threshold G-1]**

**No Impact.** Regarding cumulative impacts, all future projects would be subject to existing laws which are in place to regulate the transport, use, storage, and disposal of hazardous materials. All future projects would be required to comply with these various federal, state, and local laws. Therefore, the adoption and implementation of the WSAP would not result in cumulative impacts with respect to this criterion.

**Impact 5.9-9: Would the Project, when combined with other past, present, or reasonably foreseeable projects 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? [Threshold G-2]**

**No Impact.** Regarding cumulative impacts, all future projects would be subject to the same existing laws as the proposed Project would, which are in place to regulate the transport, use, storage, and disposal of hazardous materials. All future projects would be required to comply with these various federal, state, and local laws. Therefore, the adoption and implementation of the WSAP would not result in cumulative impacts with respect to this criterion.

**Impact 5.9-10: Would the Project, when combined with other past, present, or reasonably foreseeable projects emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of sensitive land uses? [Threshold G-3]**

**No Impact.** Regarding impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of sensitive land uses, implementation of the proposed Project would result in potential future development throughout the Planning Area, potentially within one-quarter mile of sensitive land uses. Construction activities for all projects in the County, including within incorporated jurisdictions, would be subject to the same regulatory requirements discussed for the project for compliance with existing hazardous materials regulations, including the management of hazardous materials and spill response within the respective jurisdictions. Hazardous emissions sites within the Planning Area and at other projects outside of the Planning Area and within the unincorporated County would each be required to comply with existing federal, state, and County regulations. Compliance with existing regulations would reduce impacts in the Planning Area and unincorporated County to a less than significant level, and thus, impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of sensitive land uses would not be cumulatively considerable.

**Impact 5.9-11: Would the Project, when combined with other past, present, or reasonably foreseeable projects be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment? [Threshold G-4]**

**No Impact.** Impacts related to projects being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 are generally site-specific. As discussed above, cumulative development projects would be required to comply with applicable local, State and federal regulations regarding sites included on the Cortese list, compiled pursuant to Government Code Section 65962.5, which would reduce individual effects. Further, the County's site plan review process and County Department review of development proposals would identify properties that may be listed in accordance with Government Code Section 65962.5 within the Planning Area and would be required to comply with applicable regulations accordingly. Therefore, the proposed Project's incremental contribution hazards related to projects being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 would not be cumulatively considerable.

**Impact 5.9-12: Would the Project, when combined with other past, present, or reasonably foreseeable projects be 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 result in a safety hazard or excessive noise for people residing or working in the project area? [Threshold G-5]**

**No Impact.** Airport operations and their accompanying safety hazards require careful land use planning on adjacent and nearby lands to protect the residential and business communities from the potential hazards that could be created by airport operations. LAX is the primary domestic and international airport that serves the Planning Area. LAX is located approximately four miles south of Marina del Rey and five miles south of Ladera Heights, View Park, and Windsor Hills. Land uses regarding LAX are under the Los Angeles County Airport Land Use Plan (ALUP) that provides comprehensive planning for compatible uses around County airports. Surround land uses are industrial, commercial and residential. The ALUP establishes policies regarding safety restrictions and compatibility between aircraft noise and surrounding land uses. Implementation of the proposed Project would not conflict with the ALUP . The proposed Project's impacts related to safety hazards resulting from airport-project-adjacency would not be cumulatively considerable.

**Impact 5.9-13: Would the Project, when combined with other past, present, or reasonably foreseeable project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? [Threshold G-6]**

**No Impact.** The emergency response plan for the Planning Area and the cumulative study area is the County's Operational Area Emergency Response Plan. Any future development in the unincorporated County would be included within the Operational Area Emergency Response Plan area, and would be required to comply with applicable federal, State and local regulations related to emergency response, such as emergency evacuations and adhering to fire/sheriff mandates for evacuations, in support of the response plan. Required compliance with applicable regulations throughout the unincorporated County would help ensure cumulative project

impacts related to emergency response in the County's unincorporated areas would be less than significant. All new development must adhere to the County's Building Code and Fire Code requirements for access and design features that can accommodate emergency response. Project-level compliance with applicable federal, state, and local regulations would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan would be less than significant, and proposed Project impacts would not be cumulatively considerable.

**Impact 5.9-14: Would the Project, when combined with other past, present, or reasonably foreseeable projects 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; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within proximity to land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard? [Threshold G-7]**

**No Impact.** Land uses that may pose a dangerous potential for fire hazards may include wildland open space areas subject to wildfire hazards or facilities that handle large amounts of reactive/explosive materials, such as fertilizer plants or refineries. The Planning area is highly developed and has one area designated as a VHFHSZ. The Inglewood Oil Field and Kenneth Han Recreation Area, located in the Ladera Heights, View Park and Windsor Hills communities, are located in a LRA Very High Fire Hazard Severity Zone. No development would take place within these land uses. All land uses in the County must be constructed and maintained in compliance with applicable state and local regulations and building code requirements, as well as County Fire Code requirements related to building design and hazardous materials storage and handling. Therefore, adoption of the WSAP would not result in adverse cumulative impacts with respect to this criterion.

## 5.9.5 Level of Significance Before Mitigation

Upon compliance with County ordinances, development standards, and WSAP goals and policies, impacts related to hazards and hazardous waste would be less than significant.

## 5.9.6 Mitigation Measures

No significant adverse impacts related to hazards or hazardous waste were identified and no mitigation measures are required.

## 5.9.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating hazards or hazardous waste have been identified.

## 5.9.8 References

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# 5. Environmental Analysis
## HAZARDS AND HAZARDOUS MATERIALS

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# 5.10 HYDROLOGY AND WATER QUALITY

This section identifies and evaluates issues related to hydrology and water quality to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact related to hydrology and water quality conditions in the area. 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. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.10.1 Environmental Setting

### 5.10.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *Clean Water Act*

The federal Water Pollution Control Act, or Clean Water Act (CWA) is the principal statute governing water quality. This act establishes the basic structure for regulating discharges of pollutants into the Waters of the United States and provides the U.S. Environmental Protection Agency (EPA) authority to implement pollution control programs, such as setting wastewater standards for industries. The goal of the statute 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 discharges (i.e., a discernible, confined, and discrete conveyance, such as a pipe, ditch, or channel) of any pollutant (except dredge or fill material) into waters of the U.S. Section 303(d) of the CWA requires states to identify water bodies that are "impaired," or those that do not meet water quality standards and are not supporting their beneficial uses. Total maximum daily loads (TMDL) are established in Section 303(d) to serve as pollution controls for these specific pollutants. TMDLs define how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. The Regional Water Quality Control Board (RWQCB) has developed TMDLs for select reaches of water bodies.

### *National Pollutant Discharge Elimination System*

In compliance with 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 an 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 (POTW), 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, Non-process 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. 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 one 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 post-construction 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 one acre. The MS4 Permit in effect for the Project area is Order No. R4-2021-0105, issued by the Los Angeles RWQCB in 2021. The LA County Department of Public Works enforces conditions of the MS4 NPDES permit on development and redevelopment projects under Los Angeles County's jurisdiction.

### *Federal Antidegradation Policy*

The Federal Antidegradation Policy (Title 40 Code of Federal Regulations Section 131.12) requires states to develop statewide policies to prevent degradation of water quality and identify methods for implementing those policies. Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods shall, at a minimum, protect and maintain: (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

### *National Flood Insurance Program*

The National Flood Insurance Act of 1968 established the National Flood Insurance Program in order to provide flood insurance within communities that were willing to adopt floodplain management programs to mitigate future flood losses. The Act also required the identification of all floodplain areas within the U.S. and the establishment of flood-risk zones within those areas. Federal Emergency Management Agency (FEMA) is the primary agency responsible for administering programs and coordinating with communities to establish effective floodplain management standards. FEMA is responsible for preparing Flood Insurance Rate Maps that delineate the areas of known special flood hazards and their risk applicable to the community. The program encourages the adoption and enforcement by local communities of floodplain management ordinances that reduce flood risks. In support of the program, FEMA identifies flood hazard areas throughout the United States on FEMA flood hazard boundary maps.

### *Federal Guidelines for Emergency Action, FEMA Publication No. 64*

These guidelines provide guidance to help dam owners, in coordination with emergency management authorities, effectively develop and exercise Emergency Action Plans for dams. The guidelines encourage (1) the development of comprehensive and consistent emergency action planning to protect lives and reduce property damage and (2) the participation of emergency management authorities and dam owners in emergency action planning.

### *Federal Guidelines for Dam Safety Risk Management, FEMA Publication No. 1025*

These guidelines enable federal agencies to use the general principles of risk management to make risk-informed decisions. The agencies work to develop and maintain consistent application of risk analysis, risk assessment, risk management, and risk communication, using equivalent procedures and tools. Risk estimates typically reflect the risk at a given dam at the snapshot in time when the risk analysis is performed. Risk management includes structural and nonstructural actions on a given dam, as well as activities such as routine and special inspections, instrumented monitoring, structural analyses, site investigations, development and testing of emergency action plans, and many other activities.

## State Laws, Regulations, and Policies

### *Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.), passed in 1969, requires protection of water quality by appropriate designing, sizing, and construction of erosion and sediment controls. The Porter-Cologne Act established the State Water Resources Control Board (SWRCB) and divided California into nine regions, each overseen by an RWQCB. The SWRCB is the primary State agency responsible for protecting the quality of the State's surface and groundwater supplies and has delegated primary implementation authority to the nine RWQCBs. The Porter-Cologne Act assigns responsibility for implementing the Clean Water Act Sections 401 through 402 and 303(d) to the SWRCB and the nine RWQCBs. The Porter-Cologne Act requires the development and periodic review of water quality control plans (basin plans) that designate beneficial uses of California's major rivers and groundwater basins, establish narrative and

numerical water quality objectives for those waters, provide the technical basis for determining waste discharge requirements, identify enforcement actions, and evaluate clean water grant proposals. The basin plans are updated every three years. Compliance with basin plans is primarily achieved through implementation of the NPDES, which regulates waste discharges. The Porter-Cologne Water Quality Control Act requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, that could affect the quality of the "waters of the State," file a report of waste discharge. Absent a potential effect on the quality of "waters of the State," no notification is required. However, the RWQCB encourages implementation of BMPs similar to those required for NPDES stormwater permits to protect the water quality objectives and beneficial uses of local surface waters as provided in the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan).

### *Sustainable Groundwater Management Act*

The Sustainable Groundwater Management Act requires the formation of locally controlled groundwater sustainability agencies (GSA) in high- and medium-priority groundwater basins. GSAs are responsible for developing and implementing a groundwater sustainability plan (GSP) to ensure the basin is operated within its sustainable yield without causing undesirable results. Currently, no GSP has been prepared for the basin. Pursuant to the act, low- and very-low-priority basins are not required to have a GSA or GSP. However, the judgement delivered in response to a complaint filed by the Upper San Gabriel Valley Municipal Water District in 1968 (*Upper San Gabriel Valley Municipal Water District vs. City of Alhambra et al.*, Case No. 924128) resulted in the Main San Gabriel Basin Watermaster being established as the governing body for the Basin and described a program for management of water in the Basin.

## Local Laws, Regulations, and Policies

### *Los Angeles County General Plan*

#### *Land Use Element*

The Land Use Element of the Los Angeles County General Plan (General Plan) provides the following goals and policies potentially relevant to the proposed Project:

**Goal LU 1:** A General Plan that serves as the constitution for development, and a Land Use Policy Map that implements the General Plan's Goals, Policies and Guiding Principles.

- **Policy LU 1.5.** In the review of a project-specific amendment(s) to convert OS-C designated lands to other land use designations, ensure that the project-specific amendment(s) does not contribute to the overall loss of open space that protects water quality, provides natural habitats, and contributes to improved air quality.

- **Policy LU 1.10.** Prohibit plan amendments that increase density of residential land uses within mapped fire and flood hazard areas unless generally surrounded by existing built development and the County determines the adjoining major highways and street networks can accommodate evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County.

**Goal LU 11:** Development that utilize sustainable design techniques.

- **Policy LU 11.4.** Encourage subdivisions to utilize sustainable design practices, such as maximizing energy efficiency through lot configuration; preventing habitat fragmentation; promoting stormwater retention; promoting the localized production of energy; promoting water conservation and reuse; maximizing interconnectivity; and utilizing public transit.

*Conservation and Natural Resources Element*

The Conservation and Natural Resources Element of the General Plan provides the following goals and policies potentially relevant to the proposed Project:

**Goal C/NR 5:** Protect any useable local surface water resources.

- **Policy C/NR 5.1.** Support the Low Impact Development (LID) philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.

- **Policy C/NR 5.2.** Require compliance by all County departments with adopted MS4, General Construction, and point source NPDES permits.

- **Policy C/NR 5.3.** Actively engage with stakeholders in the formulation and implementation of surface water preservation and restoration plans, including plans to improve impaired surface water bodies by retrofitting tributary watersheds with LID types of BMPs.

- **Policy C/NR 5.4.** Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/Integrated Monitoring Programs or other County-involved Total Maximum Daily Load (TMDL) implementation and monitoring plans.

- **Policy C/NR 5.5.** Manage the placement and use of septic systems in order to protect nearby surface water bodies.

- **Policy C/NR 5.6.** Minimize point and non-point source water pollution.

- **Policy C/NR 5.7.** Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals, such as roadway, railway, bridge, and other— particularly— tributary street and greenway interface points with channelized waterways.

**Goal C/NR 6:** Protect any useable local groundwater resources.

- **Policy C/NR 6.1.** Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.

- **Policy C/NR 6.2.** Protect natural groundwater recharge areas and regional spreading grounds.

- **Policy C/NR 6.3.** Actively engage in stakeholder efforts to disperse rainwater and stormwater infiltration BMPs at regional, neighborhood, infrastructure, and parcel-level scales.
- **Policy C/NR 6.4.** Manage the placement and use of septic systems in order to protect high groundwater.
- **Policy C/NR 6.5.** Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.

*Safety Element*

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the Project:

**Goal S 2:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to flood and inundation hazards.

- **Policy S 2.1.** Discourage development in the County's Flood Hazard Zones.
- **Policy S 2.2.** Discourage development from locating downslope from aqueducts.
- **Policy S 2.4.** Ensure that developments located within the County's Flood Hazard Zones are sited and designed to avoid isolation from essential services and facilities in the event of flooding.
- **Policy S 2.5.** Ensure that the mitigation of flood related property damage and loss limits impacts to biological and other resources.
- **Policy S 2.6.** Work cooperatively with public agencies with responsibility for flood protection, and with stakeholders in planning for flood and inundation hazards. The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Project:

**Goal PS/F 3:** Increased local water supplies through the use of new technologies.

- **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.
- **Policy PS/F 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.

**Goal PS/F 4:** Reliable sewer and urban runoff conveyance treatment systems.

- **Policy PS/F 4.1.** Encourage the planning and continued development of efficient countywide sewer conveyance treatment systems.

- **Policy PS/F 4.2.** Support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as Transit Oriented Districts.
- **Policy PS/F 4.3.** Ensure the proper design of sewage treatment and disposal facilities, especially in landslide, hillside, and other hazard areas.
- **Policy PS/F 4.4.** Evaluate the potential for treating stormwater runoff in wastewater management systems or through other similar systems and methods.

### *Los Angeles County Low Impact Development Ordinance*

Low impact development (LID) is a design strategy using naturalistic, on-site BMPs to lessen the impacts of development on stormwater quality and quantity. The goal of LID is to mimic the undeveloped runoff conditions of the development site with the post-development conditions. In 2014 the County of Los Angeles (County) revised LID requirements for development in unincorporated areas of the County. The County prepared the 2014 Low Impact Development Standards Manual (LID Standards Manual) to comply with the requirements of the NPDES MS4 Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of the County (CAS004001, Order No. R4- 2012-0175). The LID Standards Manual and the current MS4 Permit (R402021-0105) provide guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

## 5.10.1.2 EXISTING CONDITIONS

As previously discussed, the Westside Planning Area (Planning Area) includes the unincorporated communities of Ladera Heights, View Park, and Windsor Hills, Marina del Rey, Ballona Wetlands, and Westside Islands (West Los Angeles, West Fox Hills, Franklin Canyon, and Gilmore Island). Community members and planning staff identified 12 Opportunity Sites[1] within the Planning Area that would undergo land use and zoning changes to support increased residential density. Ten of the 12 Opportunity Sites are within the Ladera Heights, View Park, and Windsor Hills communities and one of the 12 Opportunity Site is within the West Fox Hills community. The Inglewood Oil Field is a privately owned and active oil field with pumps, tanks, ancillary equipment, energy infrastructure, access roads and other facilities within the Ladera Heights community. As further discussed in Chapter 4, *Environmental Setting*, of this Draft PEIR, the 12 Opportunity Sites and Inglewood Oil Field are all within urbanized areas of the Planning Area and are disturbed and/or developed. A discussion of the hydrologic setting for the Planning Area, including the 12 Opportunity Sites and Inglewood Oil Field, is provided below.

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

### Watersheds

The Ballona Creek Watershed spans 130 square miles that drains the Los Angeles basin from the Santa Monica Mountains on the north, the Harbor Freeway on the east, and the Baldwin Hills on the south. The major tributaries to the Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains. The watershed comprises all or parts of the cities of Beverly Hills, Culver City, Inglewood, City of Los Angels, Santa Monica, West Hollywood, and unincorporated County (DPW 2024). The Ballona Creek is a major route for much of the part of the watershed in the Los Angeles Basin.

### Flood Hazards

Flood hazard zones are areas subject to moderate or minimal flood hazards that are identified on an official Flood Insurance Rate Map issued by FEMA. Flooding in the County can be earthquake induced or can result from intense rainfall. The 100-year flood zones have a 1 percent annual chance of flooding, and 500-year flood zones have a 0.2 percent annual chance of flooding. Marina del Rey is in a 100-year flood zone, and a small area of a 100-year flood zone is mapped in the Baldwin Hills next to the east side of La Cienega Boulevard (Los Angeles County 2015). Marina del Rey Land Use Plan addresses mitigations for land uses within the flood hazards zones. The floodplains associated with the Ballona Creek watershed are in a 500-year flood zone (Los Angeles County 2015).

### Seismically Induced Dam Inundation

Dam inundation areas are mapped by dam owners and submitted to the California Office of Emergency Services. Dams with dam inundation areas in the Planning Area include the Stone Canyon Reservoir. After flood flows on an affected stream, water is released from a flood control dam at a controlled rate to create flood control capacity for the next storm. Released water from several flood control dams is used downstream of the dams for groundwater recharge. All dams must meet safety requirements and are inspected annually by the Division of Safety of Dams of the California Department of Water Resources.

### Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. Reservoirs and aboveground water storage tanks can generate seiches posing substantial flood hazards. There are numerous aboveground water storage tanks in the County. Flooding can occur if strong ground shaking causes structural damage to aboveground water tanks. Sloshing water can lift a water tank off its foundation or break the pipes leading to the tank. Standards for steel and reinforced concrete tank design are issued by the American Water Works Association and the California Department of Public Health. About 40 steel water tanks were rendered nonfunctional during the 1994 Northridge earthquake; one tank in the Santa Clarita area failed, flooding several houses below. New standards for steel water tank design adopted in 1994 include flexible joints at the inlet/outlet connections to accommodate movement in any direction.

### Tsunami

Coastal areas are vulnerable to tsunamis. Tsunamis are a series of powerful waves that originate from geologic disturbances in the ocean. Generated by large earthquakes below the ocean floor, underwater landslides,

volcanic activity, and meteor strikes, tsunamis grow significantly in mass and height as they approach land and have the potential to cause injury and damage along coastal areas in Southern California. The western portion of the Planning Area is bounded by the Pacific Ocean, so the hazard of tsunamis exists in the coastal areas. Marina del Rey is in a tsunami hazard zone, as identified by the General Plan EIR, and has a Local Coastal Program and Land Use Plan that address mitigation in the tsunami hazards zones. The tsunami inundation area extends to just inland of the inland end of the marina in Marina del Rey, which is approximately 1.6 miles inland from the shoreline. No other unincorporated areas in the Planning Area are within tsunami inundation areas. Existing land use designations in Marina del Rey, set forth in the Marina del Rey Land Use Plan certified by the California Coastal Commission in 1996, include residential (Residential III, IV, and V with maximum densities of 35, 45, and 75 units per acre, respectively); several categories of commercial land uses (hotel, office, marine commercial, and visitor serving-convenience commercial); boat storage, public facilities, parking, open space, and water (Los Angeles County 2014).

## 5.10.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County practice, a project would normally have a significant effect on the environment if the project would:

HYD-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

HYD-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

HYD-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i) Result in a substantial erosion or siltation on- or off-site.
- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.
- 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.
- iv) Impede or redirect flood flows.

HYD-4 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;

HYD-5 Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84);

HYD-6 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);

HYD-7 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

HYD-8 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

## 5.10.3 Environmental Impacts

### 5.10.3.1 METHODOLOGY

Evaluation of impacts related to hydrology and water quality is based on a review of existing policies, documents, and studies that address these services in the County. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.10.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 8:** A sustainable built environment.

- **Policy LU 8.3.** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources, generate pollution and greenhouse gas emissions, and employ other sustainable measures (e.g., LEED, Living Building Challenge, other).
- **Policy LU 8.4.** Support private development that exceeds minimum site landscaping requirements and reduces the heat island effect by incorporating green roofs and decks, durable awnings, increased tree canopy in lots not covered by buildings, bioswales and similar improvements
- **Policy LU 8.5.** Incorporate sustainable landscaping and water management practices in parklands, medians, along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.).

**Goal LU 9:** A safe built environment and infrastructure.

- **Policy LU 9.1.** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).
- **Policy LU 9.2.** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation while still operational as necessary to protect adjoining neighborhoods and uses.

**Implementation Program LUI 7.** Create educational materials promoting property maintenance and improvement and approaches for sustainable, healthy, and resilient development (e.g., solar, landscape, irrigation, other) and post on the County's website.

### Conservation and Open Space Element

**Goal COS 1:** The natural environment and natural resources are sustained for enjoyment and equitable use by future generations of Westside residents.

- **Policy COS 1.2.** Conserve and protect water quality and supply and continue to provide assistance for urban water management plans through continual partnership with the West Basin Municipal Water District.

**Goal COS 2:** Biological, natural, and open space resources are protected, conserved, and enhanced.

- **Policy COS 2.3.** Explore opportunities to rewild the Centinela Creek Channel north of West Fox Hills through collaboration with agencies such as the City of Los Angeles and Los Angeles County Flood Control District.

**Goal COS 4:** Resources are conserved and infrastructure is adapted to improve resilience and minimize contributions to climate change.

- **Policy COS 4.1.** Encourage community members and existing developments to upgrade to water conserving mechanisms such as stormwater capture systems, graywater systems, water-efficient appliances, and drought-tolerant landscape planting.

**Implementation Program COSI 3.** Work with the City of Los Angeles and Los Angeles County Flood Control District in analyzing the feasibility of and, if appropriate, develop a plan and funding mechanism for the rewilding of the Centinela Creek Channel.

## 5.10.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.10-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? [Threshold HYD-1]**

**Less Than Significant Impact.** The WSAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment at specific locations within the Planning Area at densities and intensities higher than currently exist. The WSAP would not include measures or actions that would degrade surface or groundwater quality or violate any water quality standards or waste discharge requirements. However, future projects implementing the WSAP's goals and policies, depending on the nature of future developments, could include activities that create an impact to surface or groundwater quality. Specifically with respect to the 12 Opportunity Sites identified in the communities of Ladera Heights,

View Park, and Windsor Hills and West Fox Hills, construction activities associated with new development in the Planning Area could include grading, excavation, and other types of earth-moving. Increased erosion, sedimentation, and discharge from other construction-related pollutants can potentially impact water quality. Sedimentation and polluted construction runoff can enter stormwater or nearby water bodies and introduce polluted or contaminated water, which would adversely affect water quality. Operation of future developments could also include activities (i.e., using, storing, or disposing of hazardous materials) that may introduce contaminated discharge that could affect water quality.

To address the potential impacts to water quality, future projects implementing the WSAP's goals and policies would be required to comply with the independently enforceable requirements of the NPDES General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities (Construction General Permit) and the Los Angeles County MS4 Permit. The Construction General Permit and the County MS4 Permit are designed to regulate stormwater and non-stormwater discharges. The Construction General Permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan for projects disturbing one acre (or more) of land, which would include construction BMPs designed to prevent the occurrence of soil erosion and discharge of other construction-related pollutants that could contaminate water quality. The County prepared the 2014 LID Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment project in unincorporated areas of the county with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. New developments stemming from the WSAP would be required to submit a LID Plan for review and approval by the Director of Public Works. A project's compliance with the required LID Plan, ordinance, and standards manual would be sufficient to address potential conflicts with County LID Ordinance.

New development within the Planning Area would need to comply with the NPDES Construction General Permit and the MS4 Permit. Compliance with the provisions of these permits and regulatory code would ensure that future construction activities are consistent with the County LID Ordinance and would not create a significant impact to water quality. Further, Policy COS 1.2 encourages the collaboration with the West Basin Municipal Water District to conserve and protect water quality; Policy COS 2.3 encourages collaboration with agencies such Los Angeles County Flood Control District; and Policy COS 4.1 encourages members of the community to upgrade to water-conserving mechanisms. Therefore, implementation of the WSAP would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, and impacts would be less than significant.

**Impact 5.10-2: 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? [Threshold HYD-2]**

**Less Than Significant Impact.** The WSAP consists of a policy document that is not anticipated to produce environmental impacts, but the land use and zoning changes that are a part of the WSAP would allow for greater densities than are currently allowed within the Planning Area—specifically with respect to the 12 Opportunity Sites identified in the communities of Ladera Heights, View Park, and Windsor Hills and West

Fox Hills. High densities could result in a substantial increase in the use of groundwater resources, which could have a potentially significant impact.

However, the California Building Code (CBC) regulates any development that requires grading to submit an engineering geology report, which would include information about existing groundwater supplies and potential impacts to groundwater supplies. Therefore, any development subject to the CBC would be required to account for its potential groundwater use and implement appropriate water conservation measures (or other mitigating actions) if the potential demand is projected to exceed the available supply. Developments in the unincorporated areas of the WSAP would be mostly limited to redevelopments and reuses of currently developed areas. Thus, the general location of the land use and zoning changes would result in relatively minor increases in impervious areas. Compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable, will keep potential impacts at a less than significant level. Therefore, the WSAP itself would not interfere with groundwater supplies or groundwater resources, and impacts would be less than significant.

**Impact 5.10-3: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:(i) result in a substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, (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, (iv) impede or redirect flood flows? [Threshold HYD-3]**

**Less Than Significant Impact.** The WSAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment at specific locations within the Planning Area at higher densities and intensities. The adoption of the WSAP would not directly cause alterations to drainage patterns through the alteration of the course of a stream or river or through the addition of impervious surfaces. It is possible, however, that future projects implementing the goals and policies of the WSAP would include projects or components that could contribute to the alteration of an existing drainage pattern of a site. New development could involve the addition of new impervious surfaces in the Planning Area, which could lead to increased erosion or pollution or on- or off-site flooding. As discussed above, new development within the Planning Area is required to comply with the NPDES Construction General Permit (and associated Storm Water Pollution Prevention Plan and construction BMPs) and the MS4 Permit. The County has prepared the LID Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for avoiding impacts to natural drainage systems and other water bodies, and for ensuring proper LID design strategies to regulate the addition of impervious surfaces. New developments under the WSAP would be required to submit a LID Plan for review and approval by the Director of Public Works. Compliance with the NPDES Construction General Permit, MS4 Permit, the General Plan, and the WSAP goals and policies, such as Policies COS 1.2 and COS 4.1 that target the conservation and protection of water quality, would reduce impacts related to altering a drainage pattern or course of a river or stream due to the addition of new impervious surfaces. Therefore, these impacts would be less than significant.

**Impact 5.10-4: 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? [Threshold HYD-4]**

**Less Than Significant Impact.** According to the General Plan, Marina del Rey is in a 100-year flood hazard zone, as is a small area in Ladera Heights, View Park, and Windsor Hills, and floodplains associated with the Ballona Creek watershed are in a 500-year flood zone. Marina del Rey is governed by the California Coastal Commission, and no changes to land use or zoning would occur under the WSAP. Similarly, no land use changes are proposed to the Ballona Wetlands under the WSAP. There are no flood hazard zones in West Fox Hills. Neither the 12 Opportunity Sites proposed under the WSAP nor the Inglewood Oil Field are in the area designated a 100-year flood hazard zone in Ladera Heights, View Park, and Windsor Hills. Though the WSAP would facilitate future development in certain portions of the Planning Area, the General Plan discourages development in flood hazard zones, floodplains, or flood prone areas. Further, Policy LU 9.2 of the WSAP ensures that new development is located and designed to protect structures and occupants/users from natural hazards If future developments are approved within a flood hazard zone, additional policies have been adopted to require new developments to have access to emergency services and avoid areas where flood-related property damage could impact biological (and other) resources. Therefore, impacts would be less than significant.

**Impact 5.10-5: Would the Project conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)? [Threshold HYD-5]**

**Less Than Significant Impact.** The WSAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment at specific locations within the Planning Area at densities and intensities higher than currently exist. Future developments implementing the goals and policies of the WSAP could include construction or operation activities that could impact water quality by introducing pollutants into stormwater and non-stormwater discharges. With respect to the 12 Opportunity Sites identified in the communities of Ladera Heights, View Park, and Windsor Hills and Fox Hills, high densities could result in the increase of pollutants into stormwater, which could have a potentially significant impact. However, the County has prepared the LID Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment project in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. New developments under the WSAP would be required to submit a LID Plan for review and approval by the Director of Public Works. The LID Plan must provide a comprehensive, technical discussion of how a proposed project would comply with the requirements of the LID Ordinance and LID Standards Manual. A project's compliance with the required LID plan, ordinance, and standards manual would be sufficient to address potential conflicts with the County LID Ordinance. New development in the Planning Area would be required to comply with the NPDES Construction General Permit and the Los Angeles County MS4 Permit. Compliance with the provisions of these permits would ensure that future construction activities are consistent with the County LID Ordinance. Compliance with the independently enforceable requirements of the LID Ordinance would ensure that adoption and implementation of the WSAP would result in a less than significant impact.

**Impact 5.10-6: 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)? [Threshold HYD-6]**

**Less Than Significant Impact.** The WSAP would be a long-range policy document intended to respond to local planning challenges and would allow new development and redevelopment at specific locations within the Planning Area at densities and intensities higher than currently exist. Potential future projects implementing WSAP policies and implementation actions may connect to existing sewer lines, on-site septic tanks, and/or alternative wastewater disposal systems. In the event that a septic tank or alternative wastewater disposal system installation is proposed, a testing and permitting process would need to be completed prior to installation; this process is regulated by the County Department of Public Health and the Land Use Program of the Environmental Health Division. Home and business property owners that want to install or replace an Onsite Wastewater Treatment System (OWTS) must submit an application along with the required documents listed on the application in order to go through the OWTS review process; part of the process requires soil testing to ensure the soil is suitable for septic tank use. Obtaining a permit would be required prior to the construction of any septic tank or alternative wastewater disposal system, and each system would be constructed within the standards and parameters of the SWRCB's Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012), which is enforced locally by the County Department of Public Health. System design approvals may also be submitted to the County's Building and Safety Department prior to obtaining building permits for proposed projects. Since this procedure would be required prior to the construction of all septic tanks and alternative wastewater disposal systems, all new future developments would be subject to these state and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative wastewater disposal systems; requisite compliance with these independently enforceable state and local requirements would ensure that adoption and implementation of the WSAP would have a less than significant impact.

**Impact 5.10-7: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation? [Threshold HYD-7]**

**Less Than Significant Impact.** The western portion of the Planning Area is bordered by the Pacific Ocean, and the community of Marina del Rey is in a tsunami hazard zone as well as a 100-year flood zone (Los Angeles County 2015). However, Marina del Rey is governed by the California Coastal Commission, and no changes to land use or zoning would occur under the WSAP. The WSAP would target community-serving growth near planned or existing development. Although adoption of the WSAP would not directly result in the release of pollutants due to inundation, it is possible that future projects under the WSAP or implementation actions could involve using or storing pollutants on-site and could be in or near a flood zone. If future developments subject to a discretionary agency approval are proposed within flood hazard zones, then project-specific CEQA analyses would be required—and mitigation if warranted. Compliance with these plans would ensure that any hazardous materials on-site are properly contained to prevent accidental release. In the event of inundation from a flood, any hazardous materials would be preemptively stored properly to reduce the likelihood that flood waters would introduce pollutants into the environment. The WSAP and General Plan discourage development in flood hazard zones, floodplains, or flood-prone areas. Further, Policy LU 9.2 of the WSAP ensures that new

development is located and designed to protect structures and occupants/users from natural hazards. If future developments are approved within a flood hazard zone, additional policies have been adopted to require new developments to have access to emergency services and avoid areas where flood-related property damage could impact biological (and other) resources. Therefore, impacts would be less than significant.

**Impact 5.10-8: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? [Threshold HYD-8]**

**Less Than Significant Impact.** The WSAP would support long-term development within the Planning Area at densities and intensities higher than currently allowed. This change could result in a substantial increase in the use of groundwater resources, which could have a potentially significant impact on groundwater resources. However, the CBC regulates any development that requires grading to submit an engineering geology report, which would include information about existing groundwater supplies and potential impacts to groundwater supplies. Therefore, any development subject to the CBC would be required to account for its potential groundwater use and implement appropriate water conservation measures (or other mitigating actions) if the potential demand is projected to exceed the available supply. The goals and policies presented in WSAP, such as Policy COS 1.2 and Policy COS 4.1, promote improved water quality and water sustainability in the Planning Area and encourage collaboration with urban water management plans. Therefore, the implementation of the WSAP would not substantially degrade water quality or conflict with a water management plan, and impacts would be less than significant.

## 5.10.4 Cumulative Impacts

For the purposes of this analysis of cumulative impacts related to hydrology and water quality, the geographic area of consideration consists of the County, inclusive of both incorporated and unincorporated areas. This geographic scope of analysis is appropriate for the analysis of hydrology and water quality because cumulative projects have the potential to cause significant impacts in the County if they interfere or impede sustainable groundwater management of adjacent or other jurisdictions accounted for in the General Plan.

**Impact 5.10-9: Would the Project, when combined with other past, present, or reasonably foreseeable projects violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? [Threshold HYD-1]**

**Less Than Significant Impact.** Regarding cumulative impacts, future projects may have the potential to impact surface water quality within the Planning Area. However, future projects facilitated by the WSAP would implement the goals and policies that would improve surface water quality. Additionally, as described above, future projects implementing the WSAP that have the potential to degrade surface water quality would be regulated by the permitting requirements listed above. For these reasons, the WSAP would result in less than significant cumulative impacts.

**Impact 5.10-10: Would the Project, when combined with other past, present, or reasonably foreseeable projects substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? [Threshold HYD-2]**

**Less Than Significant Impact.** The culmination of past, present, and foreseeably future projects could result in excessive groundwater withdrawal or could impede groundwater recharge through the addition of impervious surfaces. This analysis of cumulative impacts assumes most cumulative projects would be required to comply with CEQA and other independently enforceable federal, State, and county regulations prior to their approval. Implementation of the WSAP would not contribute to the interference with groundwater management and would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

**Impact 5.10-11: Would the Project, when combined with other past, present, or reasonably foreseeable projects substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:(i) result in a substantial erosion or siltation on- or off-site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, (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, (iv) impede or redirect flood flows. [Threshold HYD-3]**

**Less Than Significant Impact.** While the implementation of the WSAP would facilitate future development that could add new impervious surfaces and/or involve activities that would alter the existing drainage pattern, development projects would be required to comply with existing federal, State, and local laws and applicable policies in the General Plan. This analysis of cumulative impacts assumes most cumulative projects would be required to comply with CEQA and other independently enforceable federal, State, and county regulations prior to their approval. Therefore, implementation of the WSAP would result in less than significant cumulative impacts related to altering a drainage pattern or course of a river or stream due to the addition of new impervious surfaces.

**Impact 5.10-12: Would the Project, when combined with other past, present, or reasonably foreseeable projects 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? [Threshold HYD-4]**

**Less Than Significant Impact.** The culmination of past, present, and foreseeably future projects could potentially place structures in a 100-year flood hazard or floodplain area. The General Plan discourages development in flood hazard zones, floodplains, or flood prone areas. If future developments are approved within a flood hazard zone, additional policies have been adopted to require new developments to have access to emergency services and avoid areas where flood-related property damage could impact biological (and other) resources. This analysis of cumulative impacts assumes most cumulative projects would be required to comply with CEQA and other independently enforceable federal, State, and county regulations prior to their approval. Therefore, the WSAP would result in a less than significant cumulative impact.

**Impact 5.10-13: Would the Project, when combined with other past, present, or reasonably foreseeable projects conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)? [Threshold HYD-5]**

**Less Than Significant Impact.** The County has prepared the LID Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment project in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. New developments under the WSAP would be required to submit a LID Plan for review and approval by the Director of Public Works. The LID Plan must provide a comprehensive, technical discussion of how a proposed project would comply with the requirements of the LID Ordinance and LID Standards Manual. A project's compliance with the required LID plan, ordinance, and standards manual would be sufficient to address potential impacts related to conflicting with County LID Ordinance. New development within the Planning Area and County would be compliant with the NPDES Construction General Permit and the Los Angeles County MS4 Permit. Compliance with the provisions of these permits would ensure that future construction activities are consistent with the County LID Ordinance. Therefore, the WSAP would have no cumulative impact with respect to the LID ordinance.

**Impact 5.10-14: Would the Project, when combined with other past, present, or reasonably foreseeable projects 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)? [Threshold HYD-6]**

**Less Than Significant Impact.** Proper soils are essential for installation and maintenance of septic tank and alternative wastewater disposal systems. This analysis of cumulative impacts assumes most cumulative projects would be required to comply with CEQA and other independently enforceable federal, State, and county regulations prior to their approval. Requisite compliance with these independently enforceable state and local requirements would ensure that adoption and implementation of the WSAP would have a less than significant cumulative impact.

**Impact 5.10-15: Would the Project, when combined with other past, present, or reasonably foreseeable projects in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? [Threshold HYD-7]**

**Less Than Significant Impact**. No land use changes or zoning updates are proposed under the WSAP that would release pollutants in flood hazard, tsunami or seiche zones. If future developments subject to discretionary agency approval are proposed within flood hazard zones, then project specific CEQA analyses would be required. Compliance with these plans would ensure that any hazardous materials on-site are properly contained to prevent accidental release. In the event of inundation from a flood, any hazardous materials would be stored properly to reduce the likelihood that flood waters would introduce pollutants into the environment. Therefore, the WSAP would result in a less than significant cumulative impact.

**Impact 5.10-16: Would the Project, when combined with other past, present, or reasonably foreseeable projects conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? [Threshold HYD-8]**

**Less Than Significant Impact.** The culmination of past, present, and foreseeably future projects could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This analysis of cumulative impacts assumes compliance with State and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable as well as applicable WSAP goals and polices intended to protect water quality. Therefore, the interference of a water quality control plan or sustainable groundwater management plan would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

## 5.10.5 Level of Significance Before Mitigation

Upon compliance with County ordinances, development standards, and WSAP goals and policies, impacts would be less than significant.

## 5.10.6 Mitigation Measures

No significant adverse impacts related to hydrology and water systems were identified and no mitigation measures are required.

## 5.10.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to hydrology and water systems have been identified.

## 5.10.8 References

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# 5. Environmental Analysis
## HYDROLOGY AND WATER QUALITY

State Water Resources Control Board (SWRCB) 2012. Water Quality Control Policy for Siting, Design, Operation and Maintenance of Onsite Wastewater Treatment Systems (OWTS Policy).

US Environmental Protection Agency (USEPA). 2012, September 26. Water Permitting 101. http://www.epa.gov/npdes/pubs/101pape.pdf.

# 5.11 LAND USE AND PLANNING

This section evaluates issues related to Land Use and Planning to determine whether the Westside Area Plan (proposed Project or WSAP) would result in a significant 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. This section describes the physical environmental and regulatory setting, the threshold used to evaluate the significance of potential impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations and the public (Appendix A). These comments identify various substantive concerns related to land use and planning. Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period. Issues relating to land use and planning are addressed in this section.

## 5.11.1 Environmental Setting

### 5.11.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

There are no federal policies or regulations applicable to land use and planning with respect to the proposed Project.

#### State Laws, Regulations, and Policies

##### *State Planning Law*

State planning law (California Government Code Section 65300) requires every city and county in California to adopt a comprehensive, long-term general plan for the physical development of the jurisdiction and of any land outside its boundaries that, in the planning agency's judgment, bears relation to its planning (sphere of influence). A general plan should consist of an integrated and internally consistent set of goals and policies grouped by topic into a set of elements and guided by a jurisdiction-wide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the community that the general plan should address, such as hazards or flooding. The proposed Project is a component of the Los Angeles County (County) General Plan. Therefore, the proposed Westside Area Plan would refine countywide goals and policies in the General Plan by addressing specific issues relevant to the Planning Area.

## Regional Laws, Regulations, and Policies

### *Southern California Association of Governments (SCAG)*

Southern California Association of Governments (SCAG) is the designated regional planning agency for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, land use, sustainability, and economic development.

### *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024, and is an update to the 2020-2045 RTP/SCS. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The regional transportation network envisioned in Connect SoCal would reduce per-capita GHG emissions related to vehicular travel associated with the proposed project and assist in meeting the GHG reduction per capita targets for the SCAG region.

The 2050 RTP/SCS goals are as follows:

- Mobility: Build and maintain an integrated multimodal transportation network.
- Communities: Develop, connect and sustain communities that are livable and thriving.
- Environment: Create a healthy region for the people of today and tomorrow.
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.

## Local Laws, Regulations, and Policies

### *Regional Housing Needs Allocation (RHNA)*

The RHNA is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for eight-year periods. The RHNA provides an allocation of the existing and future housing needs by jurisdiction that represents the jurisdiction's share of the projected

regional population growth. The future housing needs allocations are broken down by income level so that each jurisdiction is responsible for the development of affordable housing units to meet future housing needs. SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which covers the planning period of October 2021 through October 2029. Several guiding principles that SCAG staff has developed to use as the basis for developing the distribution mechanism for the RHNA methodology. The RHNA allocation for jurisdictions is generally higher than the 5th RHNA cycle. Each jurisdiction must receive a share of the regional housing need. This includes planning for housing for all income levels, and consideration of factors that indicate areas with high and low concentrations of access to housing. It is important to emphasize the linkage between the RHNA and other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

The California Department of Housing and Community Development (HCD) provided SCAG a final regional determination of 1,341,827 units for the 6th cycle RHNA on October 15, 2019. Following the formal distribution of draft RHNA allocations based on the Final RHNA methodology and a separate appeals phase described in Government Code 65584.05 et seq., RHNA allocations were adopted on March 4, 2021, by the SCAG Regional Council and approved by HCD on March 22, 2021, and later modified on July 1, 2021. Based on SCAG's determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the regional existing need for additional housing units has been determined to be 836,857 units, and the regional projected need is 504,970 units (SCAG 2021).

### *Local Coastal Program*

The 1976 California Coastal Act mapped the Coastal Zone. The Coastal Act also established a comprehensive coastal protection program. The state Coastal Commission became responsible for coastal resources protection. Some Coastal Zone issues include shoreline public access, visitor accommodations, sensitive habitats, and visual resources. Commercial fisheries and water quality are also some of the issues addressed.

Two coastal areas within the Westside Planning Area (Planning Area) are within the Coastal Zone: Marina del Rey and Ballona Wetlands.

A Local Coastal Program (LCP) is the main land use document for coastal area development and natural resource protection. Each LCP has:

- A Land Use Plan. This designates goals and policies, land use classifications, and type and density of allowable development.
- A Local Implementation Plan. This identifies specific zoning regulations and procedures for development.

### *Marina del Rey Land Use Plan*

The Marina del Rey Land Use Plan (LUP) is a component of the Marina del Rey Local Coastal Program, which was adopted in 1996, and amended in 2012. The Land Use Plan guides development in the 804-acre County-owned marina. The LUP was developed to address future land use, new access, recreation and resource

protection areas, and improvement of existing facilities. The implementation program for the LUP is the Marina del Rey Specific Plan, which is contained in County Code Title 22. No change to the Marina del Reyland use is included in the WSAP.

### *Los Angeles County General Plan*

The Los Angeles County General Plan (General Plan) is a planning document that, alongside the zoning code, governs development in Los Angeles County. Adopted on October 6, 2015, the General Plan provides a policy framework for how and where the unincorporated areas would grow through 2035 (DRP 2015). The General Plan also establishes goals, policies, and programs to foster healthy, livable, and sustainable communities, and discusses new housing and jobs within the unincorporated County in anticipation of population growth. The General Plan consists of the following ten elements, including the Housing Element:

1. **Land Use Element.** The Land Use Element provides strategies and planning tools to facilitate and guide future development and revitalization efforts. The Land Use Element designates the proposed general distribution, general location, and extent of uses. Land Use policies for projects within the unincorporated areas would be relevant to the Planning Area.

2. **Mobility Element.** The Mobility Element provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The Highway Plan and the Bicycle Master Plan are sub-components of the Mobility Element.

3. **Air Quality Element.** The Air Quality Element summarizes air quality issues and outlines the goals and policies that would improve air quality and reduce GHG emissions. The County The 2045 Climate Action Plan (CAP), approved by the Los Angeles County Board of Supervisors (Board) in April 2024, outlines proposed GHG strategies, measures, and actions to reduce GHG emissions from community activities (Los Angeles 2024). The 2045 CAP is discussed in more detail below.

4. **Conservation and Natural Resources Element.** The Conservation and Natural Resources Element guides the long-term conservation of natural resources and preservation of available open space areas. The Conservation and Natural Resources Element addresses the following conservation areas: Open Space Resources; Biological Resources; Local Water Resources; Agricultural Resources; Mineral and Energy Resources; Scenic Resources; and Historic, Cultural and Paleontological Resources. Applicable goals and policies from the Conservation and Natural Resources Element are included in Section 4.4, Biological Resources.

5. **Parks and Recreation Element.** The Parks and Recreation Element plans and provides for an integrated parks and recreation system that meets the needs of residents.

6. **Noise Element.** The Noise Element reduces and limits public exposure to excessive noise levels. The Noise Element sets the goals and policy direction for the management of noise.

7. **Safety Element.** The purpose of the Safety Element is to reduce the potential risk of death, injuries, and economic damage resulting from natural and human-made hazards.

8. **Public Services and Facilities Element.** The Public Services and Facilities Element promotes the orderly and efficient planning of public services and facilities and infrastructure in conjunction with development and growth.

9. **Economic Development Element.** The Economic Development Element outlines economic development goals and provides strategies that contribute to economic well-being.

10. **2021–2029 Housing Element.** The 6th Cycle (2021-2029) Housing Element was adopted by the Board and certified by the Department of Housing and Urban Development (HUD) in May 2022. It serves as a policy guide to address the comprehensive housing needs of the unincorporated areas of the County. The primary focus of the Housing Element is to ensure decent, safe, sanitary, and affordable housing for current and future residents of the unincorporated areas, including those with special needs (DRP 2021). The Housing Element addresses the County's Regional Housing Needs Allocation (RHNA) target of 89,232 residential units and includes an inventory of sites suitable for the development of housing that will accommodate projections identified in the RHNA. Those sites that are currently zoned for other uses or lesser densities must be rezoned accordingly. Should the rezoning be at densities less than those prescribed by the Housing Element, other properties in the planning area would need to be rezoned at higher densities to accommodate the increment of lost density. The Housing Element assumes 4,972 residential units to be developed within the Planning Area to meet the broader Unincorporated Countywide target of 89,232.

### *Los Angeles County Code*

The Los Angeles County Code consists of the regulatory, penal, and administrative ordinances for the County. The following components of the County Code are applicable to the Project.

**Title 22- Planning and Zoning. Chapter 22.104- Hillside Management Areas,** was established to ensure that development preserves and enhances the physical integrity and scenic value of Hillside Management Areas (HMAs), to provide open space, and to be compatible with and enhance community character. These goals are to be accomplished by: (1) locating development outside of HMAs to the extent feasible; (2) locating development in the portions of HMAs with the fewest hillside constraints; and (3) using sensitive hillside design techniques tailored to the unique site characteristics. The HMA Ordinance and Hillside Design Guidelines (Title 22- Appendix I, Hillside Design Guidelines) implement the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. HMAs are defined as areas with 25 percent or greater natural slopes. The Hillside Design Guidelines are required for development in HMAs, unless exempted under the provisions of the ordinance. In hillside areas with less than 25 percent slope, use of the guidelines is optional but encouraged. A Sensitive Hillside Design Measures Checklist is used by applicants to determine whether the Hillside Design Guidelines would be applicable.

**Chapter 22.102-** Significant Ecological Areas (SEAs) are officially designated areas within Los Angeles County (County) with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity within the County by designating biological resource areas that are capable of sustaining themselves into the future. The SEA also protects native trees and provides a list of the protected species and the size of the diameter of the trunk that triggers protection. The SEA Ordinance establishes the permitting, design

standards, and review process for development within SEAs, balancing preservation of the County's natural biodiversity with private property rights. A discretionary SEA Conditional Use Permit application is required for development that cannot demonstrate compliance with Section 22.102.070 (Protected Tree Permit), or Sections 22.102.090 (SEA Development Standards) and 22.102.100 (Natural Open Space Preservation).

### *Active Transportation Strategic Plan*

LA Metro (Metro) adopted the Active Transportation Strategic Plan (ATSP) Update in 2023. The ATSP identifies how the agency plans to help cities encourage more walking and biking in the County. Metro's goal is to make it easier for people to walk and bike to transit stations as well as to help cities fund and build regional walk/bike paths that connect communities.

Metro is working to advance active transportation initiatives and provide more travel options throughout the County. Metro adopted the 2023 ATSP Update, which will further their mission of providing a world-class transportation system and focus specifically on improving the regional; active transportation network and first/last mile connectivity to transit. Relevant existing and proposed initiatives from the ATSP Update have been incorporated in the WSAP to further implement the ATSP Update and meet the WSAP goals of enhancing walkability and integrating land use and mobility throughout its communities.

### *Los Angeles County Bicycle Master Plan*

Los Angeles County Department of Public Works (DPW) is currently updating the County Bicycle Master Plan (BMP). The current BMP was last updated in 2012 and established a vision for the future of biking in the County. The BMP will serve as a guide for the development of safe and accessible bikeways and paths within unincorporated County and along County flood control district channels. The BMP will propose new bikeways, revisit the feasibility of unconstructed bikeways from the 2012 plan, incorporate new policies to share bikeway facilities with micro-mobility devices, identify first/last mile bikeway improvements to further connect to transit stations and bus stops, and prepare for the programmatic environmental impact report. The BMP will engage with community members, community-based organizations (CBOs), and advisory committees to develop an inclusive and representative BMP. The BMP will be finalized in early 2025.

### *Los Angeles County Vision Zero Action Plan*

Vision Zero is a traffic safety initiative to eliminate traffic-related fatalities in the County. The Vision Zero Action Plan will focus the County's efforts over the next five years to achieve the goal of eliminating traffic-related fatalities on unincorporated County roadways by 2035. This Plan defines a vision for the future and describes objectives and actions to enhance traffic safety in collaboration with government and community partners.

### *Community Traffic Safety Plan*

In response to a Board Motion passed in August 2022, DPW is developing a Community Safety Traffic Plan (CSTP) in the unincorporated communities of Ladera Heights, View Park and Windsor Hills. The CSTP will consist of traffic engineering reviews that include, but are not limited to, the feasibility of designs for road diets to curb excessive speeding, signal modifications, and residential speed mitigation throughout the community.

The CSTP will identify traffic safety focus areas within Ladera Heights, View Park and Windsor Hills and provide conceptual designs that will lead to constructible projects. The outreach and engagement for the Ladera Heights, View Park and Windsor Hills CSTP will provide community members the opportunity to not only learn about the project, but also communicate their experiences, concerns, and ideas regarding traffic safety in their community.

### *Los Angeles County Climate Action Plan 2045*

The 2045 CAP is an update to the 2020 Community Climate Action Plan (CCAP) that was adopted in 2015. It sets new targets and goals for 2030, 2035, and 2045 that align with State goals for a reduction in GHG and provides a blueprint for deep carbon reductions in unincorporated parts of Los Angeles County. The 2045 CAP builds upon the existing and ongoing efforts of the 2020 CCAP and focuses on strategies, measures, and actions to reduce GHG emissions in unincorporated areas of the County. Adoption of the CAP is anticipated in June 2024. Section 5.5, *Greenhouse Gas Emissions*, provides a more detailed summary of the content of the 2045 CAP and the WSAP's consistency with the applicable goals and policies set forth in in the 2045 CAP.

### *Community Standards Districts*

#### *Baldwin Hills Community Standards District (BHCSD)*

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021 Board motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment, proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

## 5.11.1.2 EXISTING CONDITIONS

The Westside Planning Area lies in the western portion of the County and is one of the eleven planning areas established by the County General Plan.

**Ladera Heights, View Park, and Windsor Hills.** These communities make up 3,078 acres of mixed land uses including residential neighborhoods, commercial corridors and centers, industrial use. Civic and educational facilities, parks, and open spaces. The community is largely built-out with little remaining vacant land available for development and the largest remaining open spaces are designated to recreation purposes. Major arteries include S. La Cienega Boulevard, W. Slauson Avenue, Stocker Street, and Angeles Vista Boulevard. Ladera Shopping Center and the commercial corridor along W. Slauson Avenue are the primary

commercial/retail areas. Industrial development is concentrated in the area known as the Inglewood Oil Field and visible from S. La Cienega Boulevard. As shown in Table 5.11-1, *Ladera Heights, View Park, and Windsor Hills Existing Land Use*, the Ladera Heights, View Park, and Windsor Hills communities are primarily Single Family Residential.

**Table 5.11-1 Ladera Heights, View Park, and Windsor Hills Existing Land Use**

| Existing Land Use | Acreage | Percentage |
|---|---|---|
| Single Family Residential | 1048.8 | 34% |
| Multi-Family Residential | 103.9 | 3% |
| Mixed Residential and Commercial | 2.6 | 0.1% |
| Commercial and Services | 41.5 | 1% |
| General Office | 19.9 | 1% |
| Industrial | 639.4 | 21% |
| Open Space and Recreation | 557.1 | 18% |
| Education | 85.4 | 3% |
| Facilities | 29.8 | 1% |
| Transportation, Communications, and Utilities | 24.1 | 1% |
| Vacant | 30.6 | 1% |
| Total Parcelized Acreage | 2583 | 84% |
| Right of way | 494.8 | 16% |
| **Total Land Area** | **3077.8** | **100%** |

**West Fox Hills**. The West Fox Hills community comprises 31.2 acres consisting of primarily residential uses, with some nonresidential uses along South Centinela Avenue and a large multi-family apartment complex located on the southern edge of the community. The community is largely built out with little to no vacant land available for development. As shown in Table 5.11-2, *West Fox Hills Existing Land Use*, the West Fox Hills community is primarily Single Family Residential.

**Table 5.11-2 West Fox Hills Existing Land Use**

| Existing Land Use | Acreage | Percentage |
|---|---|---|
| Single Family Residential | 14.1 | 45% |
| Multi-Family Residential | 4.3 | 14% |
| Commercial and Services | 0.6 | 2% |
| General Office | 0.7 | 2% |
| Facilities | 0.6 | 2% |
| Transportation, Communications, and Utilities | 0.1 | 0% |
| Total Parcelized Acreage | 20.3 | 65% |
| Right of way | 10.7 | 35% |
| **Total Land Area** | **31.1** | **1%** |

**Marina del Rey.** Marina del Rey is one of the largest, man-made small boat harbors in the country. The area is comprised of a mixture of boating facilities, public recreation amenities and parks, office uses, as well as residential and commercial uses. Protection of the coastline and fish and wildlife resources is unique to this coastal community. Marina del Rey is zoned Coastal Zone and falls under a Local Coastal Program, which establishes detailed land use policies and development standards. No land use changes to the Mariana del Rey community are proposed as part of the WSAP.

**Ballona Wetlands**. The Ballona Wetlands are one of the few remaining wetlands, and contain significant environmental resources. The Ballona Wetlands are designated a Coastal Zone and fall under a Local Coastal program. Ther Ballona Wetlands are owned by the State of California and managed by the California Department of Fish and Wildlife and subject to an ongoing multi-agency restoration project. No land use changes to Ballona Wetlands are proposed as part of the WSAP.

**West LA/Sawtelle VA, Franklin Canyon, Gilmore Islands.** West LA/Sawtelle VA is owned and subject to the jurisdiction of the federal government and is currently undergoing a separate master plan effect. Franklin Canyon and Gilmore Island are two islands of land within the Westside Planning Area. Franklin Canyon is made up of mostly parkland and trails, managed by the Mountains Recreation and Conservation Authority. There are no residents in unincorporated Franklin Canyon. Gilmore island serves as a parking lot and has no permanent residents. No land use changes to these communities are proposed as part of the WSAP.

## 5.11.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

LU-1 Physically divide an established community.

LU-2 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.

LU-3 Conflict with the goals and policies of the General Plan related to Hillside Management Areas and Significant Ecological Areas.

## 5.11.3 Environmental Impacts

### 5.11.3.1 METHODOLOGY

Evaluation of impacts related to land use is based on a review of existing policies, documents, and studies that address these services in the County. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.11.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 1:** Unincorporated communities with distinct identities and uses.

- **Policy LU 1.3.** Ensure that plan updates fully engage the participation of the diverse constituencies of the unincorporated communities.

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.1.** Focus growth and the development of new commercial and housing as infill and re-use of commercial corridors and centers, while supporting current businesses and preserving the character of existing residential neighborhoods, parklands, and open spaces.
- **Policy LU 2.2.** Concentrate development in proximity to the Crenshaw Line (K Line) transit station and along major bus corridors including Slauson Avenue.
- **Policy LU 2.3.** Encourage the revitalization and enhancement of the Slauson Avenue corridor by maintaining or adaptively re-using commercial buildings for neighborhood serving uses, while expanding opportunities for moderate-scale mixed use or housing.
- **Policy LU 2.4.** Encourage the development of small and undersized parcels through lot consolidation to support market-supportable land uses.
- **Policy LU 2.5.** Anticipate and plan for the long-term redevelopment of the Inglewood Oil Field and ensure that future uses are integrated and connected to the existing community.

- **Policy LU 2.6.** Ensure that plans for growth and development in adjoining municipalities are compatible and correspond with the goals and policies for Ladera Heights, View Park-Windsor Hills, and West Fox Hills communities.

**Goal LU 4:** A diversity of land uses providing for community needs.

- **Policy LU 4.1.** Continue providing for a mix of housing, commercial, community services, and parklands/open spaces that cumulatively contribute to the area's identity and role as a "complete community" for residents.
- **Policy LU 4.2.** Accommodate the development of a wide variety of housing options for residents and workers that are affordable to households of varying income levels.
- **Policy LU 4.3.** Encourage commercial uses that serve and are accessible to adjoining residential neighborhoods.
- **Policy LU 4.4.** Encourage land uses that promote healthy food choices for local residents.
- **Policy LU 4.5.** Encourage and expand uses and spaces that reflect the area's history and culture.
- **Policy LU 4.6.** Provide for recreational activities and the inclusion of parklands and open spaces within the fabric of existing and future land uses.
- **Policy LU 4.7.** Work with West Los Angeles College to explore opportunities to facilitate the provision of student and/or employee housing within the campus and to improve access to the campus from neighboring communities once the Inglewood Oil Field transitions to new uses.

**Goal LU 6:** Vital and active commercial and mixed-use districts serving residents and visitors to the community.

- **Policy LU 6.1.** Create incentives such as waivers of fees and development standards to attract private investment to revitalize and improve underutilized properties along Slauson Avenue and actively promote their use by commercial property owners and developers.
- **Policy LU 6.2.** Provide flexibility in permitted land uses and enable adaptability and re-use of existing buildings to allow changes responding to evolving markets and preventing vacancies.
- **Policy LU 6.3.** Encourage the redevelopment of existing multi-tenant commercial projects as mixed-use community-oriented centers, increasing the number of residents in proximity to retail and commercial uses, enhancing their economic vitality.
- **Policy LU 6.4.** Promote development integrating commercial uses and housing within existing commercial corridors, consistent with State legislation.

- **Policy LU 6.5.** Design development that fosters pedestrian activity by orienting one or more building entrances and providing direct pedestrian access to the adjoining primary street sidewalk and incorporation of plazas, landscaping and common open spaces.

- **Policy LU 6.6.** Support beautification of existing businesses and encourage improvement of building facades recognizing opportunities to reflect historic design styles.

- **Policy LU 6.7.** Encourage the development of multi-modal transportation hubs within larger commercial and mixed-use centers.

**Goal LU 7:** A complete community with uses that support resident needs.

- **Policy LU 7.1.** Accommodate a wide range of facilities offering services to meet the needs of resident, such as financial, medical, services, government, seniors, youth, cultural, and similar uses.

- **Policy LU 7.2.** Accommodate social, religious, cultural, and recreational facilities and programs that equitably meet the diverse needs of residents.

**Goal LU 8:** A sustainable built environment.

- **Policy LU 8.1.** Ensure that new development is located and designed to respect natural landforms and topography and protect native ecologies, wildlife, and open spaces.

- **Policy LU 8.2.** Explore methods to stop or reduce the proliferation of broadcast towers on ridgelines through consolidation or redesign.

- **Policy LU 8.3.** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources, generate pollution and greenhouse gas emissions, and employ other sustainable measures (e.g., LEED, Living Building Challenge, other).

- **Policy LU 8.4.** Support private development that exceeds minimum site landscaping requirements and reduces the heat island effect by incorporating green roofs and decks, durable awnings, increased tree canopy in lots not covered by buildings, bioswales and similar improvements.

- **Policy LU 8.5.** Incorporate sustainable landscaping and water management practices in parklands, medians, along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.).

**Goal LU 9:** A safe built environment and infrastructure.

- **Policy LU 9.1.** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).
- **Policy LU 9.2.** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation as necessary to protect adjoining neighborhoods and uses, while still operational.
- **Policy LU 9.3.** Proactively manage vegetation in fire hazard areas.

**Goal LU 10:** A community invested in planning.

- **Policy LU 10.1.** Continuously engage community organizations, stakeholders, and traditionally under-represented groups in the planning process.

**Implementation Program LUI 1.** In consultation with stakeholders and residents, design and implement a *Placemaking Plan* that may include:

- Additions or improvements of infrastructure such as: entry signage and monuments, street trees, benches, shade structures, recycling and trash bins on sidewalks, crosswalks, wayfinding signage, and public art installations.
- Integration of pocket parks and open spaces on public properties and in streetscapes.
- Implementation of public art programs to enhance community identity, which may include placement of murals on blank commercial building facades. This may be coordinated with public agencies, schools, community groups and organizations, and local artists.

**Implementation Program LUI 2.** Assess the feasibility of developing student housing on campus and/or adjoining properties at West Los Angeles College.

**Implementation Program LUI 4.** Pursue and administer funding for loans and grants for the maintenance and renovation of façades and property of private commercial and residential properties and buildings.

**Implementation Program LUI 5.** Maintain and administer programs and services contributing to the quality of life and health of the WSA's residents, such as recreation, seniors, youth health, safety preparedness and resilience, and others as defined by the County General Plan and WSAP Public Facilities and Services Elements.

**Implementation Program LUI 6.** Consider developing incentives, such as low interest loans or grants, that encourage the owners and operators of cell towers located on ridgelines to consolidate facilities to the extent feasible, design improvements to enhance their visual quality, and incorporate extensive landscape.

**Implementation Program LUI 7.** Create educational materials promoting property maintenance and improvement and approaches for sustainable, healthy, and resilient development (e.g., solar, landscape, irrigation, other) and post on the County's website.

### Conservation and Open Space Element

**Goal COS 5**: The Westside's scenic resources and natural features are protected from adverse impacts.

- **Policy COS 5.1.** Require new development to respect, integrate with, and complement the natural features of the land, including conforming building massing to topographic forms, restricting grading of steep slopes, and encouraging the preservation of visual horizon lines and significant hillsides as prominent visual features.

## 5.11.3.3 IMPACT ANALYSIS

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.11-1: Would the Project divide an established community? [Threshold LU-1]**

**Less Than Significant Impact.** Division of an established community commonly occurs because of development and construction of physical features that constitute a barrier to easy and frequent travel between two or more constituent parts of a community. As shown under 5.11.3.1, *Proposed Project Characteristics and Relevant WSAP Goals and Policies*, the Land Use Element of the WSAP provides policies designed to ensure the prevention of dividing communities such as policies LU 4.1 through 4.6 which promote enhancing the existing communities.

There are no specific development projects that are identified or included as part of the WSAP. However, implementation of the WSAP would result in higher density residential and mixed-use zones within the identified 12 Opportunity Sites[1] shown in Figure 3-5, *Opportunity Sites Map*, in the Ladera Heights, View Park, Windsor Hills and West Fox Hills communities. These proposed changes in land use and zoning would allow for future construction of additional residential units and therefore, result in population growth. However, these are already developed urbanized areas within the Planning Area that are accessible by major roadways, as well as existing and proposed transit and pedestrian networks.

Policies in the WSAP would not only improve connectivity, but compatibility between existing and future development. This includes Policies LU-4.1 and LU-4.6 which promote a diverse community and preserving community identity and LU-6.1 through LU-6.6 which contribute to commercial and mixed-uses to promote connectivity. No aspect of the proposed Project would divide communities within the Planning Area. As described above, the proposed Project includes provisions that directly address land use connectivity, compatibility, and encroachment of new development on existing neighborhoods and land uses. Therefore, the proposed Project would result in less than significant impacts regarding the division of an established community or land use compatibility issues.

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

**Impact 5.11-2: Would the WSAP 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 impact? [Threshold LU-2]**

**Less Than Significant Impact.**

## SCAG Connect SoCal Consistency

The 2050 population projection for the unincorporated portion of the County in the RTP/SCS is 1,106,100 by 2050. The proposed Project could result in future development of 6,489 households, or a population of 15,704. Therefore, the proposed Project is consistent with the growth projections identified int eh 2024-2025 RTP/SCS. The WSAP would also be consistent with the RTP/SCS and State goals through emphasis on design and reduction in vehicle miles traveled (VMT). The proposed WSAP is consistent with the goals of the RTP/SCS and would further State goals through emphasis on design and reduction in VMT, as discussed in Table 5.11-3, *Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals.*

**Table 5.11-3 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| **Mobility:** Build and maintain an integrated multimodal transportation network. | Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. | **Consistent:** The proposed Project includes a Mobility Element that outlines policies to improve mobility within the Planning Area. The Mobility Element supports the use of alternative modes of transportation, including walking, bicycling, and transit, to increase access opportunities and community connectivity (WSAP Goal M 4) and reduce impacts of traffic-related emissions (WSAP Goal M 5 and Policy LU 3.3). The Mobility Element also includes policies related to improving pedestrian and bicycle safety and reducing other transportation-related safety hazards (WSAP Policies M 1.2, M 1.3, M 1.6, M 2.1, M 2.3, M 4.1, M 4.8, M 4.10, and LU 3.4). |
| | Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. | **Consistent:** The WSAP would place growth near planned or existing transit stations and areas, commercial retail service areas, and active transportation corridors. For example, WSAP Policies M 3.1, LU 2.2, and LU 3.3 would encourage development in proximity to active transportation corridors. Additionally, the County's Bicycle Master Plan identifies several bicycle improvements within the Planning Area, and the Mobility Element would |

**Table 5.11-3 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| | | support these improvements by identifying locations where infrastructure remains disconnected between jurisdictions (WSAP Goal M 4). Furthermore, Policy M 3.3 encourages convenient and safe transit, pedestrian, and bicycle linkages to/from transit service and mobility hubs and improving first/last-mile connections to Metro K Line stations, including Hyde Park, Leimert Park, and Martin Luther King Jr stations. |
| | Support planning for people of all ages, abilities and backgrounds. | **Consistent:** The WSAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors. |
| **Communities:** Develop, connect, and sustain livable and thriving communities. | Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. | **Consistent.** The proposed Project would increase residential and mixed-use densities within major commercial corridors and centers and along high-quality transit corridors (see Figure 3-4, *Proposed Land Uses*, of this Draft PEIR). |
| | Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households. | **Consistent.** The proposed Project supports a variety of housing types, including High Density Residential and mixed-use development to encourage better connectivity to employment and commercial uses. Policies LU-2.1 through LU 2.6, LU 4.1 through LU-4.3, LU-6.1 through LU-6.7 encourage a balanced land use pattern, a diversity of housing types, jobs-housing balance, and transit-oriented development. Therefore, the proposed Project would be consistent with this policy. |
| **Environment:** Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region. | Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. | **Consistent:** The WSAP includes Goal COS 4, which focuses on improving resiliency and minimizing contributions to climate change. Policy COS 4.1 encourages new and existing developments to upgrade to water-conserving mechanisms such as stormwater capture systems, graywater systems, and drought tolerant landscapes. Additionally, the WSAP also includes Goal LU 9 that focuses on a safe built environment and infrastructure. Under Policy LU |

**Table 5.11-3 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| | | 9.1, new developments should be designed and located to protect structures and occupants from natural hazards such as flooding and landslides. Additionally, Policy LU 9.3 calls for proactive management of vegetation in fire hazard areas. |
| | Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water. | **Consistent:** The proposed Project objectives include focusing new housing and commercial development in existing commercial corridors and centers and in proximity to transit; prioritizing local serving businesses; fostering land use development patterns and densities and improving streetscapes that promote a more active pedestrian environment; and improving the variety of travel choices for residents such as walking, biking, and public transit. The WSAP includes Policies LU 3.1, LU 4.3, LU 5.2, LU 6.7, LU 12.1, LU 13.5, and LU 14.6 in addition to Policies M 3.1, M 3.3, M 4.4, and M 4.12 to support these objectives. Overall, these components of the proposed Project would contribute to building denser communities and improving active and public transit infrastructure and contribute to reducing passenger vehicle trips, thereby also potentially reducing VMT and overall transportation fuel demands and mobile-source criteria air pollutant and GHG emissions. |
| | Conserve the region's resources. | **Consistent.** The proposed Project contains several policies in the Land Use and Conservation and Open Space elements that would preserve and enhance areas that may provide habitat for special-status species (LU-8.1, COS-2.1 through COS 2.3). Therefore, the proposed Project would be consistent with this policy. |

**Table 5.11-3 Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals**

| Connect SoCal 2024–2050 RTP/SCS Goals | Connect SoCal 2024–2050 RTP/SCS Subgoals | Consistency |
|---|---|---|
| **Economy:** Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region. | Improve access to jobs and educational resources. | **Consistent:** The WSAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors. Additionally, the proposed Project would increase mixed-use densities. This proposed land use development pattern and approach would contribute to increasing local employment opportunities and is supported by WSAP Policies LU 3.1 and LU 5.10. Furthermore, the Economic Development Element of the WSAP includes Goal ED 3, which supports equitable jobs access. |
| | Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. | **Not Applicable:** The Mobility Element of the WSAP focuses on further development of a multimodal transportation network that would accommodate efficient automobile, public transit, and active transit movement. It emphasizes improving access to public transit and improving the active transit network in addition to improving overall street system safety. While the WSAP does not have specific emphasis on goods movement system, improvement to street system safety (see Impact 5.17-3 of this Draft PEIR) would generally benefit efficient vehicle movement. |

Source: SCAG 2024.

## County General Plan Consistency

The proposed Project is consistent with the goals of the General Plan. As noted in the Land Use Element of the WSAP, the goals and policies of the WSAP were developed to supplement the goals and policies of the General Plan and to address the unique objectives and circumstances of the Westside communities. Table 5.11-4, *Plan Consistency,* compares the Goals of the Land Use Element from the General Plan to the policies and goals included in the WSAP.

**Table 5.11-4 General Plan Consistency**

| General Plan Goal | Consistency Analysis |
|---|---|
| **Goal LU 1:** A General Plan that serves as the constitution for development, and a Land Use Policy Map that implements the General Plan's Goals, Policies and Guiding Principles. | **Consistent.** The goals and policies of the WSAP were developed to supplement the goals and policies of the General Plan to address the unique objectives and circumstances of the Westside communities. |
| **Goal LU 2:** Community-based planning efforts that implement the General Plan and incorporate public input, and regional and community level collaboration. | **Consistent.**<br>• **Policy LU 1.3** Ensure that plan updates fully engage the participation of the diverse constituencies of the unincorporated communities.<br>**Goal LU 10: A community invested in planning.**<br>• **Policy LU 10.1** Continuously engage community organizations, stakeholders, and traditionally under-represented groups in the planning process.<br>• Policy LU 10.2 Encourage community engagement processes in the development projects and infrastructure improvements. |
| **Goal LU 3:** A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs. | **Consistent.**<br>**Goal LU 8: A sustainable built environment.**<br>• **Policy LU 8.1** Ensure that new development is located and designed to respect natural landforms and topography and protect native ecologies, wildlife, and open spaces.<br>• **Policy LU 8.2** Explore methods to stop or reduce the proliferation of broadcast towers on ridgelines through consolidation or redesign.<br>• **Policy LU 8.3** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources, generate pollution and greenhouse gas emissions, and employ other sustainable measures (e.g., LEED, Living Building Challenge, other).<br>• **Policy LU 8.4** Support private development that exceeds minimum site landscaping requirements and reduces the heat island effect by incorporating green roofs and decks, durable awnings, increased tree canopy in lots not covered by buildings, bioswales and similar improvements<br>• **Policy LU 8.5** Incorporate sustainable landscaping and water management practices in parklands, medians, along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.). |
| **Goal LU 4:** Infill development and redevelopment that strengthens and enhances communities. | **Consistent.**<br>**Goal LU 2: Growth that is sustainable and managed to complement and maintain the character of the existing community.**<br>• **Policy LU 2.1** Focus growth and the development of new commercial and housing as infill and re-use of commercial corridors and centers, while supporting current businesses and preserving the character of existing residential neighborhoods, parklands, and open spaces.<br>• **Policy LU 2.2** Concentrate development in proximity to the Crenshaw Line (K Line) transit station and along major bus corridors including Slauson Avenue.<br>• **Policy LU 2.3** Encourage the revitalization and enhancement of the Slauson Avenue corridor by maintaining or adaptively re-using commercial buildings for neighborhood serving uses, while expanding opportunities for moderate-scale mixed use or housing.<br>• **Policy LU 2.4** Encourage the development of small and undersized parcels through lot consolidation to support market-supportable land uses.<br>• **Policy LU 2.5** Anticipate and plan for the long-term redevelopment of the Inglewood Oil Field and ensure that future uses are integrated and connected to the existing community.<br>• **Policy LU 2.6** Ensure that plans for growth and development in adjoining municipalities are and correspond with goals and policies for Ladera Heights, View Park-Windsor Hills and West Fox Hills communities. |

**Table 5.11-4 General Plan Consistency**

| General Plan Goal | Consistency Analysis |
|---|---|
| | **Goal LU 6 Vital and active commercial and mixed-use districts serving residents and visitors to the community.**<br>• **Policy LU 6.1** Create incentives such as waivers of fees and development standards to attract private investment to revitalize and improve underutilized properties along Slauson Avenue and actively promote their use by commercial property owners and developers.<br>• **Policy LU 6.2** Provide flexibility in permitted land uses and enable adaptability and re-use of existing buildings to allow changes responding to evolving markets and preventing vacancies.<br>• **Policy LU 6.3** Encourage the redevelopment of existing multi-tenant commercial projects as mixed-use community-oriented centers, increasing the number of residents in proximity to retail and commercial uses, enhancing their economic vitality.<br>• **Policy LU 6.4** Promote development integrating commercial uses and housing within existing commercial corridors, consistent with State legislation.<br>• **Policy LU 6.5** Design development that fosters pedestrian activity by orienting one or more building entrances and providing direct pedestrian access to the adjoining primary street sidewalk and incorporation of plazas, landscaping and common open spaces.<br>• **Policy LU 6.6** Support beautification of existing businesses and encourage improvement of building facades recognizing opportunities to reflect historic design styles.<br>• Policy LU 6.7 Encourage the development of multi-modal transportation hubs within larger commercial and mixed-use centers. |
| **Goal LU 5:** Vibrant, livable and healthy communities with a mix of land uses, services and amenities. | **Consistent.**<br>**Goal LU 4 A: Diversity of land uses providing for community needs**<br>• **Policy LU 4.1** Continue providing for a mix of housing, commercial, community services, and parklands/open spaces that cumulatively contribute to the area's identity and role as a "complete community" for residents.<br>• **Policy LU 4.2** Accommodate the development of a wide variety of housing options for residents and workers that are affordable to households of varying income levels.<br>• **Policy LU 4.3** Encourage commercial uses that serve and are accessible to adjoining residential neighborhoods.<br>• **Policy LU 4.4** Encourage land uses that promote healthy food choices for local residents.<br>• **Policy LU 4.5** Encourage and expand uses and spaces that reflect the area's history and culture.<br>• **Policy LU 4.6** Provide for recreational activities and the inclusion of parklands and open spaces within the fabric of existing and future land uses.<br>• **Policy LU 4.7** Work with West Los Angeles College to explore opportunities to facilitate the provision of student and/or employee housing within the campus and to improve access to the campus from neighboring communities once the Inglewood Oil Field transitions to new uses. |
| **Goal LU 6:** Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services. | **Not Applicable.** The Planning Area is fully developed and in an urban environment. Therefore, the goal to protect rural and non-urban agricultural environments is not applicable to the proposed Project. |
| **Goal LU 7:** Compatible land uses that complement neighborhood character and the natural environment. | **Consistent.**<br>**Goal LU 6: Vital and active commercial and mixed-use districts serving residents and visitors to the community.**<br>• **Policy LU 6.1** Create incentives such as waivers of fees and development standards to attract private investment to revitalize and improve underutilized properties along Slauson Avenue and actively promote their use by commercial property owners and developers. |

**Table 5.11-4 General Plan Consistency**

| General Plan Goal | Consistency Analysis |
|---|---|
| | • **Policy LU 6.2** Provide flexibility in permitted land uses and enable adaptability and re-use of existing buildings to allow changes responding to evolving markets and preventing vacancies.<br>• **Policy LU 6.3** Encourage the redevelopment of existing multi-tenant commercial projects as mixed-use community-oriented centers, increasing the number of residents in proximity to retail and commercial uses, enhancing their economic vitality.<br>• **Policy LU 6.4** Promote development integrating commercial uses and housing within existing commercial corridors, consistent with State legislation.<br>• **Policy LU 6.5** Design development that fosters pedestrian activity by orienting one or more building entrances and providing direct pedestrian access to the adjoining primary street sidewalk and incorporation of plazas, landscaping and common open spaces.<br>• **Policy LU 6.6** Support beautification of existing businesses and encourage improvement of building facades recognizing opportunities to reflect historic design styles.<br>• **Policy LU 6.7** Encourage the development of multi-modal transportation hubs within larger commercial and mixed-use centers.<br>**Goal LU 7: A complete community with uses that support resident needs.**<br>• **Policy LU 7.1** Accommodate a wide range of facilities offering services to meet the needs of resident, such as financial, medical, services, government, seniors, youth, cultural, and similar uses.<br>• **Policy LU 7.2** Accommodate social, religious, cultural, and recreational facilities and programs that equitably meet the diverse needs of residents. |
| **Goal LU 8:** Land uses that are compatible with military operations and military readiness, and enhance safety for military personnel and persons on the ground. | **Not Applicable.** There are no military operations or military uses within the Plan Area. Therefore, this goal does not apply to the WSAP. |
| **Goal LU 9:** Land use patterns and community infrastructure that promote health and wellness. | **Consistent.**<br>**Goal LU 9: A safe built environment and infrastructure.**<br>• **Policy LU 9.1** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).<br>• **Policy LU 9.2** Monitor pollution, toxic materials, and other impacts from oil field operations and require mitigation as necessary to protect adjoining neighborhoods and uses, while still operational.<br>• **Policy LU 9.3** Proactively manage vegetation in fire hazard areas. |
| **Goal LU 10:** Well-designed and healthy places that support a diversity of built environments. | **Consistent.**<br>• **Policy LU 4.4** Encourage land uses that promote healthy food choices for local residents.<br>• **Policy LU 4.6** Provide for recreational activities and the inclusion of parklands and open spaces within the fabric of existing and future land uses. |
| **Goal LU 11:** Development that utilize sustainable design techniques. | **Consistent.**<br>**Goal LU 8: A sustainable built environment.**<br>• **Policy LU 8.1** Ensure that new development is located and designed to respect natural landforms and topography and protect native ecologies, wildlife, and open spaces.<br>• **Policy LU 8.2** Explore methods to stop or reduce the proliferation of broadcast towers on ridgelines through consolidation or redesign.<br>• **Policy LU 8.3** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and non-renewable resources, generate pollution and greenhouse gas emissions, and employ other sustainable measures (e.g., LEED, Living Building Challenge, other).<br>• **Policy LU 8.4** Support private development that exceeds minimum site landscaping requirements and reduces the heat island effect by incorporating green roofs and decks, |

**Table 5.11-4 General Plan Consistency**

| General Plan Goal | Consistency Analysis |
|---|---|
| | durable awnings, increased tree canopy in lots not covered by buildings, bioswales and similar improvements.<br>• **Policy LU 8.5** Incorporate sustainable landscaping and water management practices in parklands, medians, along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.). |

Source: DPR 2015.

## Consistency with County Land Use Plans and Regulations

The WSAP Land Use Element will be a component of the General Plan and is guided by the General Plan's Guiding Principles. As stated in the WSAP Land Use Element, the WSAP goals are intended to supplement the goals and policies identified in the General Plan by managing growth, supporting housing for all, encouraging thriving commercial uses, creating walkable neighborhoods, and supporting environmental sustainability throughout its communities (DRP 2015). Table 5.11-4 above shows that the General Plan land use goals are consistent with the WSAP. In addition, the WSAP is a County-led document which is intended to supplement all existing plans within the County, such as the Active Transportation Strategic Plan, Marina del Ray Land Use Plan, Bicycle Master Plan, Vision Zero Action Plan, the Community Traffic Safety Plan, and the Climate Action Plan 2045. As further described in Section 3.3 of Chapter 3, *Project Description*, the goals, policies, and actions in these various plans helped to inform, support, align, and guide the goals, policies, and actions of the WSAP. The WSAP is a component of the General Plan and is closely related to the other County planning efforts. No inconsistent policies were identified, nor were any proposed WSAP policies found to potentially conflict with the intent of regional plans or preclude the attainment of regional plans' primary goals. Therefore, the WSAP would result in a less than significant impact related to the planning and land use criterion addressed in this analysis.

### Impact 5.11-3: Would the Project conflict with the goals and policies of the General Plan related to Hillside Management Areas and Significant Ecological Areas? [Threshold LU-3]

**Less Than Significant Impact.** The Planning Area is located within the unincorporated Los Angeles County; therefore, the Hillside Management Areas (HMA) Ordinance and Significant Ecological Area (SEA) Ordinance would apply to future development in the Planning Area. The HMA Ordinance is intended to, "ensure that development preserves and enhances the physical integrity and scenic value of Hillside Management Areas (HMAs), to provide open space, and to be compatible with and enhance community character". The HMA Ordinance and HMA Design Guidelines implement the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. The HMA Ordinance also requires that a Conditional Use Permit (CUP) be obtained for most development in an HMA. The CUP would require project review and would apply conditions to project approval, if necessary, to ensure compliance with the HMA Ordinance. Additionally, the Conservation and Open Space Element includes additional goals and policies intended to protect resources and manage development within HMAs. Therefore, the WSAP would be required to be consistent with the County HMA

Ordinance and include additional policies intended to protect HMAs. As such, the WSAP would not conflict with any policies related to the protection of HMAs.

The County SEA Ordinance applies to areas within the WSAP designated as SEAs. The Planning Area has one designated SEA, the Ballona Wetlands. In compliance with the Housing Accountability Act codified in Government Code Section 65589.5, the WSAP proposes to update the zoning of the following parcels: APNs 4211-016-900, 4211-017-901, 4211-016-903, 4211-015-900, and 4211-015-903 to be consistent with the existing land use. The existing zoning, Light Agriculture (A-1-1) and Specific Plan (SP) are not compatible with the current land use, Open Space Conservation (OS-C) and Open Space Water (OS-W) and revising them to Open Space (O-S) will make the zoning and land use consistent. There are no land use changes proposed in Ballona Wetlands as part of the WSAP Therefore the SEA Ordinance would not apply and there would be no impact.

There are no land use changes within an SEA. projects implementing the WSAP located in HMAs would be required to demonstrate compliance with the HMA Ordinance, and also be required to obtain CUPs as appropriate, this approval process would reduce the potential for the WSAP to have impacts related to inconsistencies with SEAs and HMAs, and impacts would be less-than-significant level.

## 5.11.4 Cumulative Impacts

**Impact 5.11-4: Would the Project, when combined with other past, present, or reasonably foreseeable projects implementation divide an established community?**

**Less Than Significant Impact.** Other projects in or near the WSAP that have been approved in the past or will be approved in the reasonably foreseeable future may include program level or physical development projects that when combined, have the potential to result in the division of an established community. However, these projects, like the proposed WSAP, would be subject to CEQA and would be required to comply with planning documents, such as the General Plan, and other plans that have been prepared in part to ensure compatibility among communities. The WSAP would not result in the division of an established community and several policies of the proposed Project would not only improve connectivity, but compatibility between existing and future development. Therefore, the WSAP would not contribute to a cumulative impact that would result in the division of communities and cumulative impacts would be less than significant.

**Impact 5.11-5: Would the Project, when combined with other past, present, or reasonably foreseeable projects implementation conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less Than Significant Impact**. Other projects in or near the WSAP that have been approved in the past or will be approved in the reasonably foreseeable future include development projects that when combined, have the potential to result in potential inconsistency with the General Plan or other regional and use plans adopted to avoid or mitigate environmental impacts. These projects, like the proposed WSAP, would be subject to CEQA and would be required to comply with planning documents, such as the County General Plan, general plans prepared by nearby cities, and regional plans. These plans have been prepared to ensure consistency region wide. No mitigation is required.

**Impact 5.11-6: Would the Project, when combined with other past, present, or reasonably foreseeable projects conflict with the goals and policies of the General Plan related to Hillside Management Areas and Significant Ecological Areas? [Threshold LU-3]**

**Less Than Significant Impact.** Other projects in or near the WSAP that have been approved in the past or will be approved in the reasonably foreseeable future include development projects that when combined, have the potential to result in potential inconsistency with the General Plan or other regional and use plans adopted to avoid or mitigation mitigate environmental impacts. These projects, like the proposed WSAP, would be subject to CEQA and would be required to comply with planning documents, such as the County General Plan, general plans prepared by nearby cities, and regional plans. Additionally, any projects located in HMAs or SEAs would be required to demonstrate compliance with the SEA Ordinance and HMA Ordinance, and also be required to obtain CUPs, this permitting process would reduce the potential cumulative impacts on SEAs and HMAs to a less-than-significant level.

## 5.11.5 Level of Significance Before Mitigation

After compliance with County ordinances, development standards, and WSAP goals and policies, impacts related to land use would be less than significant.

## 5.11.6 Mitigation Measures

No significant adverse impacts related to land use were identified and no mitigation measures are required.

## 5.11.7 Level of Significance After Mitigation

Impacts related to land use would be less than significant.

## 5.11.8 References

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# 5.12 MINERAL RESOURCES

This section identifies and evaluates issues to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact related to mineral resources. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scooping period of the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period. Comments received during scoping relating to mineral resources were considered during preparation of this section. These comments identify various substantive concerns related to mineral resources.

## 5.12.1 Environmental Setting

### 5.12.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

There are no applicable federal policies or regulations related to mineral resources.

#### State Laws, Regulations, and Policies

##### *Surface Mining and Reclamation Act*

The Surface Mining and Reclamation Act of 1975 (SMARA; California Public Resources Code, Sections 2710 et seq.) is the primary regulator of onshore surface mining in the state. SMARA delegates specific regulatory authority to local jurisdictions. The act requires the State Geologist (California Geological Survey [CGS]) to identify all mineral deposits in the state and to classify them as (1) areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources; (2) areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists; (3) areas containing known or inferred mineral occurrences of undetermined mineral resource significance; or (4) areas where available information is inadequate to assign any other classification (DOC 2014). Lands are designated mineral resource zones (MRZ) or MRZ-1, -2, -3, or -4, respectively. Local jurisdictions are required to enact specific procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of state legislators in enacting SMARA was the premature loss of minerals and protection of sites threatened by development practices that might preclude future mineral extraction.

##### *California Geological Survey Mineral Resources (CGS) Project*

The CGS Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by SMARA. Nonfuel mineral resources include metals such as gold, silver, iron, and

copper; industrial metals, such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate, including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. SMARA requires all cities and counties to incorporate in their general plans the mapped designations approved by the State Mining and Geology Board. The classification process involves the determination of P-C region boundaries based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only those portions of the region that are urbanized or urbanizing and are classified for their aggregate content. The Planning Area is entirely within the San Fernando Valley P-C region.

### *California Geologic Energy Management Division*

The California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources, oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells, while working to help California achieve its climate change and clean energy goals. CalGEM regulates the drilling, operation, and permanent closure of energy resource wells (DOC 2019).

### *California Department of Conservation, Geologic Energy Management Division*

The Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources (DOGGR), is a subdivision of the California Department of Conservation. CalGEM oversees the drilling, operation, maintenance, and closing of oil, natural gas, and geothermal wells. The division is intended to protect the environment, prevent pollution, and ensure public safety (DRP 2015). It functions as an information repository but also regulates oil and gas extraction activities consistent with State regulations that include Section 3000 et seq. of the California Public Resources Code (PRC) and Title 14, Division 2, Chapter 4 of the California Code of Regulations (CCR). These codes include provisions regulating the distribution of oil wells (County of Los Angeles 2015).

### *California Department of Conservation Idle Well Program*

Inactive and deserted oil and gas wells that are not maintained (i.e., "idle wells") can pose threats to groundwater and public safety (DOC 2022). In April 2019, CalGEM revised its idle well regulations to create more stringent testing requirements that better protect public safety and the environment from the potential threats posed by idle wells. The regulations require idle wells to be tested and, if necessary, repaired, or permanently sealed and closed.

If an operator becomes insolvent or deserts their idle wells, responsibility for permanently sealing and closing these wells may fall to the State. Since 1977, CalGEM has plugged and abandoned about 1,400 wells at a cost of $29.5 million (DOC 2022). To reduce the number of idle wells for which the state may become responsible, legislative and regulatory changes have been made to create incentives for operators to manage and eliminate their idle wells by entering into Idle Well Management Plans (IWMPs). If an operator does not have an IWMP, the operator must pay annual idle well fees. In 2018, CalGEM collected approximately $4.3 million in idle well fees (DOC 2022). These fees are deposited into the Hazardous and Idle-Deserted Well Abatement Fund to help fund the permanent sealing and closure of deserted wells (DOC 2022).

## Regional Laws, Regulations, and Policies

There are no regional laws, regulations, and/or policies that are specifically applicable to mineral resources.

## Local Laws, Regulations, and Policies

### *Los Angeles County (County) Code*

**Title 22, Planning and Zoning.** The following subsections of Title 22, Planning and Zoning (Zoning Code) of the County Code, including Section 22.140.400, Oil Wells, Chapter 22.190, Surface Mining Permits, Division 10, Community Standards Districts, and the proposed Green Zones Program, are applicable to mineral resources in the Westside Planning Area (Planning Area) and discussed in further detail below.

**Section 22.140.400, Oil Well.** Section 22.140.400, Oil Wells, regulates oil wells in the unincorporated areas of the County, including the installation and use of equipment, structures, and facilities for oil drilling and producing operations. Within Light Manufacturing (M-1), Restricted Heavy Manufacturing (M-1.5), and Heavy Manufacturing (M-2), a Ministerial Site Plan Review (Chapter 22.186) application is required. A Conditional Use Permit (Chapter 22.158) application is required for all oil wells outside established oil fields, or, if located in Zone M-2, if located within 300 feet of any public school or park, or any Residential Zone or Light Agriculture (A-1) zones. Oil drilling is not permitted within 300 feet of any residence, except for a residence on the same land that is owned or leased by the person drilling the well.

**Chapter 22.190, Surface Mining Permit.** Chapter 22.190, Surface Mining Permit, of the Zoning Code is established to regulate surface mining (including aggregate mining) in the unincorporated areas of the County in compliance with SMARA. Section 122.190.030, Applicability, requires that all surface mining projects submit a Surface Mining Permit application and a Reclamation Plan prior to approval. Surface mining operations must comply with Section 3503, Surface Mining and Reclamation Practice, of Title 14 of the CCR and be conducted in accordance with the County's development standards as set forth in Section 22.190.050, Development Standards, of the Zoning Code.

### *Los Angeles County General Plan*

#### *Land Use Element*

The Land Use Element of the Los Angeles County General Plan (General Plan) provides the following goals and policies potentially relevant to the proposed Project (DRP 2015):

**Goal LU 7:** Compatible land uses that complement neighborhood character and the natural environment.

- **Policy LU 7.5.** Ensure land use compatibility in areas adjacent to mineral resources where mineral extraction and production, as well as activities related to the drilling for and production of oil and gas, may occur.

#### *Conservation and Natural Resource Element*

The Conservation and Natural Resource Element of the General Plan provides the following goals and policies relevant to the mineral resources in the Westside Planning Area (Planning Area) (County of Los Angeles 2015):

**Goal C/NR 10:** Locally available mineral resources to meet the needs of construction, transportation, and industry.

- **Policy C/NR 10.1.** Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses.

- **Policy C/NR 10.5.** Manage mineral resources in a manner that effectively plans for access to development and conservation of mineral resources for existing and future generations.

**Goal C/NR 11:** Mineral extraction and production activities that are conducted in a manner that minimizes impacts to the environment.

- **Policy C/NR 11.1.** Require mineral resource extraction and production activities and drilling for and production of oil and natural gas to comply with County regulations and state requirements, such as SMARA, and CALGEM regulations.

- **Policy C/NR 11.3.** Require appropriate levels of remediation for all publicly-owned oil and natural gas production sites based on possible future uses.

- **Policy C/NR 11.4.** Require that mineral resource extraction and production operations as well as activities related to the drilling for and production of oil and natural gas be conducted to protect other natural resources and prevent excessive grading in hillside areas.

- **Policy C/NR 11.5.** Encourage and support efforts to increase the safety of oil and gas production and processing activities, including state regulations related to well stimulation techniques such as hydraulic fracturing or "fracking.

*Safety Element*

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the proposed Project (DRP 2015):

**Goal S 6:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to human-made hazards.

- **Policy S 6.1.** Assess public health and safety risks associated with existing oil and gas facilities in the unincorporated Los Angeles County.

- **Policy S 6.2.** Coordinate with State and regional air quality agencies to ensure funding and implementation of annual inspections, ongoing air monitoring, and health impact assessment data continue to be collected and used to prioritize and facilitate the timely phase out of existing wells.

- **Policy S 6.3.** Support State and federal policies and proposals that increase funding sources to help plug, abandon, remediate and revitalize idle and orphaned well sites, and advocate for increased funding that will provide critical relief to the County and its residents.

### Oil Well Ordinance

According to the County Board of Supervisors (Board), "The growing body of scientific and public health evidence demonstrating the health, safety, and climate threats posed by oil and gas extraction has led to increased support for stronger regulations as well as the call to phase out urban oil drilling in its entirety" (County of Los Angeles 2021). In response, the Board recently approved Ordinance No. 2003-004 (Oil Well Ordinance), which was adopted on January 24, 2023, and became effective February 23, 2023. The Oil Well Ordinance prohibits new oil wells and production facilities in the unincorporated areas of the County, designates existing oil wells and production facilities in the unincorporated County as nonconforming due to use, and establish consistent regulations for existing oil wells and production facilities during the amortization period. A nonconforming use is a legally established use that is not permitted in a certain zone or area (County of Los Angeles 2023). Pursuant to Section 22.172.050 (Nonconforming Uses, Buildings and Structures) of the Zoning Code, nonconforming uses must be discontinued and removed from their sites within 20 years, except when extended or revoked as otherwise provided (County of Los Angeles 2022a). The Oil Well Ordinance does not apply to the Baldwin Hills Community Standards District (BHCSD) nor do oil wells and production uses operating under a valid discretionary permit. In separate actions, the County amended the BHCSD and individual specific plans to prohibit new wells and production facilities and add additional standards, as applicable. The County will also take separate actions to pursue modifications to valid discretionary permits in accordance with existing procedures in Title 22 of the County Code (County of Los Angeles 2022a).

### Community Standards District

#### *Baldwin Hills Community Standards District*

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021 Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment, proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

Additionally, the Multiple Agency Coordination Committee (MACC) was established to coordinate activities between the various agencies with regulatory authority over oil operations in the CSD. The agencies included in the MACC include:

- County of Los Angeles
  - Department of Regional Planning
  - Fire Department
  - Department of Public Works
  - Department of Public Health
- Culver City
- State of California
  - CalGEM
  - Regional Water Quality Control Board (RWQCB)
- South Coast Air Quality Management District

### *Just Transitions Strategy*

The Just Transition Task Force (Task Force) was established by the County and City and Los Angeles Chief Sustainability Offices in 2021 to develop a Just Transition Strategy for workers and communities impacted by the phase out of oil drilling and extraction activities in the City of Los Angeles and unincorporated areas of the County (e.g., as a result of the recently approved Oil Well Ordinance for the County). The Task Force developed goals, strategies, and supporting actions to ensure a just transition for workers and communities impacted by the phase out of oil drilling and extraction activities (County of Los Angeles 2022b).

## 5.12.1.2 EXISTING CONDITIONS

### Mineral Resource Zones

SMARA requires CGS to identify all mineral deposits in the state and to classify them as one of four MRZs (MRZ-1, -2, -3, or -4). The MRZ-2 classification designates areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists (DOC 2014). The General Plan identifies a portion of the Ladera Heights, View Park, and Windsor Hills communities and Marina del Rey as MRZ-2 designations for oil and gas resources (County of Los Angeles 2015). The MRZ-2 portion identified in the Ladera Heights, View Park, and Windsor Hills communities is associated with the Inglewood Oil Field. No proposed land use changes or zoning updates under the WSAP would occur to areas designated MRZ-2 in the Planning Area. No other portions in the Planning Area are classified as an MRZ.

### Inglewood Oil Field

The Planning Area, although largely urbanized and heavily developed with residential uses, continues to support active oil and/or natural gas production activities. A large portion of the Ladera Heights, View Park, and Windsor Hills area is associated with the Inglewood Oil Field, which is bounded by West Los Angeles College and Culver City to the northwest, Holy Cross Cemetery and Mortuary to the southwest, La Brea Avenue and Kenneth Hahn State Recreation Area to the east, and the Yvonne Burke Sports Complex Baseball Fields. The

Inglewood Oil Field is currently the largest urban oilfield in the nation. It is characterized by large open spaces featuring several hundred pumpjacks and appurtenant equipment and uses that are visible from adjacent areas. Oil discoveries in the 1920s caused a second oil boom that made the Los Angeles area a leading oil exporter and led to economic growth and prosperity. The abundance of local oil fostered the development of several key industries in and around Los Angeles, including automotive, rubber and tires, steel, and paving. The oil field has been in operation since 1924; however, the County has started the process to prohibit drilling of new oil wells and to phase out existing operations over the next 20 years, through the BHCSD amendment.

## 5.12.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines and County practice, a project would have a significant effect on the environment if the project would:

M-1 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.

M-2 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.

## 5.12.3 Environmental Impacts

### 5.12.3.1 METHODOLOGY

Evaluation of impacts related to mineral resources is based on a review of existing policies, documents, and studies that address these services in the county. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.12.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing character of the existing community.

- **Policy LU 2.5.** Anticipate and plan for the long-term redevelopment of the Inglewood Oil Field and ensure that future uses are integrated and connected to the existing community.

**Goal LU 22 (Inglewood Oil Field):** Redevelopment of the Inglewood Oil Field with Uses Contributing to the Quality of Life of Community Residents

- **Policy 22.1.** Support the abatement of existing oil operations and redevelopment for uses that complement and are integrated with existing neighborhoods and districts.

- **Policy LU 22.3.** Enable the community to be actively involved in the determining and planning for uses to be developed as replacement of existing Oil Field operations.

### Conservation and Natural Resources Element

**Goal COS 3:** The Inglewood Oil Field is transformed into a public and environmental asset.

- **Policy COS 3.1.** Incorporate open space preservation, habitat restoration, and the provision of new recreational opportunities into plans for the future re-use of the Inglewood Oil Field.

- **Policy COS 3.2.** Ensure that future use of the Inglewood Oil Field is linked with adjoining recreational areas, trails, residential neighborhoods, and commercial/mixed use districts for the enjoyment of County residents.

- **Policy COS 3.3.** When feasible, restore native species vegetation of the Inglewood Oil Field to provide new habitats for special status species (rare, threatened, or endangered) that may be found on-site.

## 5.12.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for potentially significant mineral resource impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.12-1: Would the Project 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? [Threshold M-1]**

**No Impact.** The General Plan includes a map of designated MRZs in the county. The map specifically delineates areas that are designated as MRZ-2, which indicates that an area contains a known mineral resource; the mineral resources map also includes areas of oil and gas resources in the Planning Area (County of Los Angeles 2015). The designated MRZ-2 areas include the Inglewood Oil Field and Marina del Rey. No proposed land use changes or zoning updates would occur in Marina del Rey under the WSAP as it is under the jurisdiction of the California Coastal Commission. The Inglewood Oil Field, though identified as an Opportunity Site in the WSAP, would not be undergoing land use changes or zoning updates as part of the proposed project. Land uses at the Inglewood Oil Field would continue to be governed by the BHCDS, and any future changes would be conducted under a separate planning process. Policies COS 3.1 through 3.3. aim to transform the Inglewood Oil Field, through separate future planning processes, to ensure the restoration of habitats, opportunities for recreational uses, and to ensure that future use is integrated with neighboring communities. There would be no loss of availability of a known mineral resource that is of value to the region and the residents of the state with the implementation of the WSAP. Therefore, no impact would occur.

**Impact 5.12-2: Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? [Threshold M-2]**

**No Impact.** As discussed previously, no land use changes or zoning updates are proposed under the WSAP to areas designated MRZ-2. Regulations of the Inglewood Oil Field operations are conducted under the BHCSD that is currently being amended to decommission operations. The WSAP goals and policies anticipate the re-development of the Inglewood Oil Field and future uses are connected to existing communities. Therefore, there would be no loss of availability of locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan with the implementation of the WSAP. Therefore, no impact would occur.

## 5.12.4 Cumulative Impacts

The geographic scope of analysis for cumulative mineral resource impacts encompasses the Planning Area. The proposed Project could contribute to a significant cumulative impact if the proposed Project resulted in the loss of availability of a known mineral resource valuable to the region and the state or caused the loss of availability of a locally important mining or other resource recovery site delineated in the County's General Plan.

**Impact 5.12-3: Would the Project, when combined with other past, present, or reasonably foreseeable projects 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? [Threshold M-1]**

**No Impact.** Individual future projects developed under the WSAP are anticipated to be located primarily in the urban environment on vacant or underutilized parcels and/or on disturbed areas with existing infrastructure. Areas designated MRZ-2 in the Planning Area are not anticipated to undergo changes with respect to future development. Although regulations of the Inglewood Oil Field operations are under the BHCSD, which is currently being amended to decommission operations, the General Plan includes goals and policies that are designed to protect significant mineral resources by restricting land uses adjacent to known mineral resources. Additionally, SMARA regulates surface mining operations to ensure that adverse environmental impacts are minimized, and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state's mineral resources. Compliance with the existing goals and policies included in the General Plan, as well as the existing SMARA regulations, would be sufficient to address the potential impacts of future development. There would be no loss of availability of a known mineral resource that is of value to the region and the residents of the state with the implementation of the WSAP. Therefore, it would not contribute to a cumulative impact with respect to mineral resources.

**Impact 5.12-4: Would the Project, when combined with other past, present, or reasonably foreseeable projects, 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? [Threshold M-2]**

**No Impact.** As discussed previously, no land use changes or zoning updates are proposed under the WSAP to areas designated MRZ-2. Individual future projects developed under the WSAP are anticipated to be located primarily in the urban environment on vacant or underutilized parcels and/or on disturbed areas with existing infrastructure. Required compliance with the existing goals and policies included in the General Plan, as well as the existing SMARA regulations, would be sufficient to address the potential impacts of future development. Therefore, there would be no loss of availability of locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan with the implementation of the WSAP. Therefore, it would not contribute to a cumulative impact with respect to mineral resources.

## 5.12.5 Level of Significance Before Mitigation

After compliance with County ordinances, development standards, and WSAP goals and policies, no impacts related to mineral resources would occur.

## 5.12.6 Mitigation Measures

No significant adverse impacts related to mineral resources were identified and no mitigation measures are required.

## 5.12.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to mineral resources have been identified.

## 5.12.8 References

County of Los Angeles. 2021. *Protecting Communities Near Oil and Gas Drilling Operations in Los Angeles County*. Revised Motion by Supervisors Holly J. Mitchell and Sheila Kuehl. September 15, 2021.

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# 5. Environmental Analysis
## MINERAL RESOURCES

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# 5.13 NOISE

This section identifies and evaluates issues related to noise to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) would result in a significant impact related to noise. This section estimates the existing sound environment; examines federal, State, and local noise guidelines, policies, and standards; and reviews noise levels at existing receptor locations. This evaluation uses procedures and methodologies that include those as specified by or emulate those of Caltrans and the Federal Highway Administration (FHWA). This section evaluates the potential for the proposed Project to result in noise impacts in the unincorporated communities of Ladera Heights, View Park, and Windsor Hills and West Fox Hills of the WSAP area, where land use and zoning changes are proposed. The information in this section is based in part on information contained in the following document:

- *Noise and Vibration Impact Assessment for the Westside Area Plan*, ECORP Consulting, Inc., April 2024 (Appendix H)

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). These comments identify various substantive concerns related to noise. Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.13.1 Environmental Setting

This section discusses the existing environmental setting relative to noise. As described in Chapter 3, *Project Description*, the proposed Project is evaluated at a programmatic level and the analysis is based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could be considered. As a result, this section describes generally the Planning Area and, where applicable, the general areas of future potential land use changes as part of implementing the WSAP, because those are the areas that may result in changes to the environment, and they were not already considered in previous environmental analyses or studies.

#### 5.13.1.1 REGULATORY BACKGROUND

### Federal Laws, Regulations, and Policies

#### *Noise Control Act of 1972*

The Noise Control Act of 1972 established a national policy to promote an environment for all Americans to be free from noise that jeopardizes their health and welfare (GovInfo 2021).

"Information on Levels of Environmental Noise Requisite to Protect Health and Welfare with an Adequate Margin of Safety," commonly referred to as the "Levels Document," establishes an A-weighted sound day and night equivalent ($L_{dn}$) of 55 A-weighted decibels (dBA) as the requisite level, with an adequate margin of safety, for areas of outdoor uses, including residences and recreation areas (USEPA 1974).

The Federal Energy Regulatory Commission Guidelines on Noise Emissions from Compressor Stations, Substations, and Transmission Lines require that:

> ... the noise attributable to any new compressor stations, compression added to an existing station, or any modification, upgrade, or update of an existing station must not exceed a $L_{dn}$ of 55 dBA ("A-weighted decibel") at any preexisting noise-sensitive area (such as schools, hospitals, or residences). (Code of Federal Regulations, Title 18, Part 380)

This policy was adopted based on the United States Environmental Protection Agency's (EPA) identified level of significance of 55 $L_{dn}$ dBA.

### *United States Environmental Protection Agency*

In addition to FHWA standards, the EPA has identified the relationship between noise levels and human response. The EPA has determined that over a 24-hour period, an equivalent noise level ($L_{eq)}$ of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at a $L_{eq}$ of 55 dBA and interior levels at or below 45 dBA. These levels are relevant to planning and design and useful for informational purposes, but they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community; therefore, they are not mandated.

The EPA also set 55 dBA $L_{dn}$ as the basic goal for exterior residential noise intrusion. However, other federal agencies, in consideration of their own program requirements and goals, as well as the difficulty of actually achieving a goal of 55 dBA $L_{dn}$, have settled on the 65 dBA $L_{dn}$ level as their standard. At 65 dBA $L_{dn}$, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

### *Federal Highway Administration Noise Abatement Procedure*

Proposed federal or federal-aided highway construction projects at a new location, or the physical alteration of an existing highway that significantly changes the horizontal or vertical alignment or increases the number of through-traffic lanes, require an assessment of noise and consideration of noise abatement per the Code of Federal Regulations Title 23, Part 772, "Procedures for Abatement of Highway Traffic Noise and Construction Noise." The FHWA has adopted noise abatement criteria for sensitive receivers—such as picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals—when "worst-hour" noise levels approach or exceed 67 dBA $L_{eq}$. (Caltrans 2020a)

### *Federal Interagency Committee on Noise*

The Federal Interagency Committee on Noise (FICON) thresholds of significance assist in the evaluation of increased traffic noise. The 2000 FICON findings provide guidance as to the significance of changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. FICON's measure of substantial increase for transportation noise exposure is as follows:

- If the existing ambient noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.) are less than 60 dBA Ldn and the project creates a readily perceptible 5 dBA Ldn or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or

- If the existing noise levels range from 60 to 65 dBA Ldn and the project creates a barely perceptible 3 dBA Ldn or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or

- If the existing noise levels already exceed 65 dBA Ldn and the project creates a community noise level increase of greater than 1.5 dBA $L_{dn}$.

### *Department of Housing and Urban Development*

The Department of Housing and Urban Development (HUD) regulations set forth the following exterior noise standards for new home construction assisted or supported by HUD (HUD 2024):

- 65 $L_{dn}$ or less – Acceptable

- 65 $L_{dn}$ and less than 75 $L_{dn}$ – Normally Unacceptable (appropriate sound attenuation measures must be provided)

- 75 Ldn – Unacceptable

HUD's regulations do not contain standards for interior noise levels. Rather a goal of 45 dBA is set forth, and attenuation requirement are gears to achieve that goal.

### *Occupational Safety and Health Administration*

The Occupational Safety and Health Administration's Occupation Noise Exposure Hearing Conservation Amendment (Federal Register 48 [46], 9738–9785, 1983) stipulates that protection against the effects of noise exposure shall be provided for employees when sound levels exceed 90 dBA over an 8-hour exposure period. Protection shall consist of feasible administrative or engineering controls. If such controls fail to reduce sound levels to acceptable levels, personal protective equipment shall be provided and used to reduce exposure of the employee. Additionally, a Hearing Conservation Program must be instituted by the employers whenever employee noise exposure equals or exceeds the action level of an 8-hour time-weighted average sound level of 85 dBA. The Hearing Conservation Program requirements consist of periodic area and personal noise monitoring, performance and evaluation of audiograms, provision of hearing protection, annual employee training, and record keeping. (OHSA 2024)

### *Federal Transit Administration and California Department of Transportation*

The criteria for environmental impact from groundborne vibration are based on the maximum levels for a single event. Table 5.13-1, *Construction Vibration Damage Criteria*, lists the potential vibration damage criteria associated with construction activities, as suggested in *Transit Noise and Vibration Impact Assessment* (FTA 2018).

**Table 5.13-1 Construction Vibration Damage Criteria**

| Building Category | Peak Particle Velocity (inches/sec) | Approximate Velocity in decibels ($L_v$)[1] |
|---|---|---|
| Reinforced-concrete, steel, or timber (no plaster) | 0.50 | 102 |
| Engineered concrete and masonry (no plaster) | 0.30 | 98 |
| Non-engineered timber and masonry buildings | 0.20 | 94 |
| Buildings extremely susceptible to vibration damage | 0.12 | 90 |

Source: FTA 2018.
[1] Root-mean-square (RMS) velocity in decibels, (VdB) 1 microinch per second (micro-in/sec).

Federal Transit Administration (FTA) guidelines show that a vibration level of up to 102 VdB (equivalent to 0.5 inch/sec in root-mean-square[RMS]) (FTA 2018) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 inch/sec in RMS). The RMS values for building damage thresholds referenced above are shown in Table 5.13-2, *Guideline Vibration Damage Potential Threshold Criteri*a, which is taken from the *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

**Table 5.13-2 Guideline Vibration Damage Potential Threshold Criteria**

| Structure and Condition | Maximum Peak Particle Velocity (In/sec) | |
|---|---|---|
| | Transient Sources[1] | Continuous/Frequent Intermittent Sources[2] |
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12 | 0.08 |
| Fragile buildings | 0.20 | 0.10 |
| Historic and some old buildings | 0.50 | 0.25 |
| Older residential structures | 0.50 | 0.30 |
| New residential structures | 1.0 | 0.50 |
| Modern industrial/commercial buildings | 2.0 | 0.50 |

Source: Caltrans 2020.
[1] Transient sources create a single, isolated vibration event, such as blasting or drop balls.
[2] Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers.

Based on Table 8-3 in the FTA's *Transit Noise and Vibration Impact Assessment*, interpretation of vibration criteria for detailed analysis is 78 VdB for residential uses during daytime hours (FTA 2018). During nighttime hours, the vibration criterion is 72 VdB. For office and office buildings, the FTA guidelines suggest that a vibration level of 84 VdB should be used for detailed analysis.

### *Federal Aviation Administration Aircraft Noise Standards*

The Federal Aviation Administration Advisory Circular Number 150 5020 2, "Noise Assessment Guidelines for New Helicopters," recommends the use of a cumulative noise measure, the 24-hour equivalent sound level [$L_{eq}(24)$], to compare the relative contributions of the heliport and other sound sources within the community.

The $L_{eq}(24)$ is similar to the $L_{dn}$, which is used to assess the noise impacts of fixed-wing aircraft. The helicopter $L_{eq}(24)$ values are obtained by logarithmically adding the "single-event level" values over a 24-hour period.

Public Law 96 193 also directs the Federal Aviation Administration to identify land uses that are "normally compatible" with various levels of noise from aircraft operations (refer to Table 5.13-3). Because of the size and complexity of many major hub airports and their operations, Federal Aviation Regulation Part 150 identifies a large number of land uses and their attendant noise levels.

**Table 5.13-3 Federal Aviation Administration Normally Compatible Community Sound Levels**

| Type of Area | $L_{eq}$ (24) |
|---|---|
| Residential | |
| • Suburban | 57 |
| • Urban | 67 |
| • City | 72 |
| Commercial | 72 |
| Industrial | 77 |

Source: ECORP 2024.
Note: The Leq is the Equivalent Continuous Noise Level, which describes sound levels that vary over time, resulting in a single decibel value that takes into account the total sound energy over the period of time of interest.

## State Laws, Regulations, and Policies

### *State of California General Plan Guidelines*

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. The General Plan Guidelines provide cities with recommended community noise and land use compatibility standards that can be adopted or modified at the local level based on conditions and types of land uses specific to that jurisdiction.

### *California Building Code*

The State of California provides a minimum standard for building design through Title 24, Part 2, of the California Code of Regulations, commonly referred to as the "California Building Code" (CBC). The CBC is updated every three years. The most recent building standard adopted by the legislature and used throughout the State is the 2022 version, which took effect on January 1, 2023. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. The County of Los Angeles Building Regulations are presented in Chapter 7 of the County Code.

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residences, schools, or hospitals, are near major transportation noises and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. Future individual projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows in a noise environment of 65 dBA community noise equivalent level (CNEL) or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA $L_{eq}$(1hr).

All new multifamily housing must comply with CBC Section 1207, "Sound Transmission." The CBC underwent a major reform in 2013, when Sections 1207.1 to 1207.13—in effect since 1974—were repealed and Section 1207 from the International Building Code was adopted instead. The IBC and hence the CBC, however, does not have any requirements for interior noise attributable to exterior sources, instead relying on local General Plan requirements. The California Department of Housing and Community Development later amended Section 1207 by re-incorporating, under subsection 1207.4, "Allowable interior noise levels," the requirement limiting interior noise to no more than 45 $L_{dn}$ or CNEL, as applicable, so as to be consistent with the local jurisdiction's Noise Element requirements. The new language reads as follows:

> 1207.4 Allowable interior noise levels. Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level ($L_{dn}$) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan.

### *California Airport Noise Standards*

California Code of Regulations Title 21, Section 5012, establishes 65 dBA CNEL as the acceptable level of aircraft noise for persons living in the vicinity of airports. Noise-sensitive land uses are generally incompatible in locations where the aircraft exterior noise level exceeds 65 dBA CNEL unless an aviation easement for aircraft noise has been acquired by the airport proprietor. Assembly Bill 2776 requires any person who intends to sell or lease residential properties in an Airport Influence Area to disclose that fact to the person buying the property.

### *California Department of Transportation Vibration/Groundborne Noise Standards*

California has not adopted statewide standards or regulations for evaluating vibration or groundborne noise impacts from land use development projects facilitated by the WSAP measures and actions. However, Caltrans, in its *Transportation and Construction Vibration Guidance Manual*, recommends vibration criteria that may be used for evaluating groundborne vibration impacts (Caltrans 2020). The Caltrans vibration thresholds are shown in Table 5.13-2.

## Local Laws, Regulations, and Policies

### *Los Angeles County Noise Ordinance*

The Project is in unincorporated Los Angeles County. Applicable County noise standards and policies are described below.

**Noise Ordinance.** The County of Los Angeles Noise Ordinance is in County Code, Chapter 12.08, Noise Control, and identifies exterior noise standards for any source of sound at any location within the unincorporated areas of the county and specific noise restrictions, exemptions, and variances for exterior noise sources. Several of the ordinance requirements are applicable to aspects of the Project and are discussed below.

Section 12.08.390, Exterior noise standards, establishes the following exterior noise standards and is summarized in Table 5.13-4, *Exterior Noise Standards*.

**Table 5.13-4 Exterior Noise Standards**

| Noise Zone | Designated Noise Zone Land Use (Receptor Property) | Time Interval | Exterior Noise Level (dB) |
|---|---|---|---|
| I | Noise-Sensitive Area | Anytime | 45 |
| II | Residential Properties | 10:00 pm to 7:00 am (nighttime)<br>7:00 am to 10:00 pm (nighttime) | 45<br>50 |
| III | Commercial Properties | 7:00 am to 10:00 pm (daytime)<br>10:00 pm to 7:00 am (nighttime) | 55<br>60 |
| IV | Industrial Properties | Anytime | 70 |

As stated in Section 12.08.390, Exterior noise standards, the above noise level limits may not be exceeded for a cumulative period of more than 30 minutes in any hour. If the existing ambient $L_{50}$ exceeds these levels, then the ambient $L_{50}$ becomes the exterior noise level. For events shorter than 30 minutes, higher noise limits are used for the exterior noise standards. For example, 5, 10, and 15 dBA are added to the above noise limits for events less than 15, 5, and 1 minute, respectively. Twenty dBA above noise limits (70 dBA $L_{max}$ during the day and 65 dBA $L_{max}$ during the night) may not be exceeded for any period of time.

Similarly, for interior noise standards, County Code, Section 12.08.400, Interior noise standards, sets an allowable interior noise level of 45 dBA for 7:00 a.m. to 10:00 p.m. and 40 dBA for 10:00 p.m. to 7:00 a.m. for all multifamily residential uses. Section 12.08.400 also states that, for events shorter than 5 minutes in any hour, the noise standard is increased in 5 dBA increments in each standard. For example, 5 and 10 dBA are added to these noise limits for events less than 5 minutes and 1 minute, respectively. If the measured ambient noise reflected by the $L_{50}$ exceeds that permissible within any of the interior noise standards, the allowable interior noise level shall be increased in 5 dBA increments in each standard, as appropriate, to reflect the ambient noise level.

As part of Specific Noise Restrictions in Part 4 of the County Code, Section 12.08.440, Construction noise, the County also has the following construction noise restrictions:

A. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound there from creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

B. Noise Restrictions at Affected Structures. The contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed those listed in the following schedule:

1. At Residential Structures.

a. Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) or of mobile equipment:

| | Single-Family Residential | Multifamily Residential | Semiresidential/ Commercial |
|---|---|---|---|
| Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m. | 75 dBA | 80 dBA | 85 dBA |
| Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays | 60 dBA | 64 dBA | 70 dBA |

b. Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:

| | Single-Family Residential | Multifamily Residential | Semiresidential/ Commercial |
|---|---|---|---|
| Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m. | 60 dBA | 65 dBA | 70 dBA |
| Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays | 50 dBA | 55 dBA | 60 dBA |

2. At Business Structures.

a. Mobile equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment:

b. Daily, including Sunday and legal holidays, all hours: maximum of 85 dBA.

c. All mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order.

d. In case of a conflict between this chapter [Chapter 12.08, Section 12.08.440, Construction Noise] and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control.

For planning purposes, the 24-hour average sound levels (CNEL) are roughly equivalent to $L_{eq}$ measurements plus 5 dBA when traffic is the dominant noise source (Office of Noise Control 1976, 21). The County Noise Ordinance, Section 12.08.350, provides a presumed perception threshold of 0.01 in/sec RMS. The vibration level of 0.01 in/sec RMS is equivalent to 0.04 in/sec PPV.

### *Los Angeles County General Plan*

#### *Noise Element*

The Noise Element of the County's General Plan provides the following goals and policies potentially relevant to noise for the proposed Project (DRP 2015). The California Government Code Section 65302(g) requires that a noise element be included in the General Plan of each county and city in the state. The introductory paragraph on page 1 of Chapter 11, Noise Element, states that the purpose of the Noise Element of the Los Angeles County General Plan is to reduce and limit the exposure of the general public to excessive noise levels. The Noise Element sets the goals and policy direction for the management of noise in the unincorporated areas.

**Goal N 1:** The reduction of excessive 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 dB (CNEL or $L_{dn}$) 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 dBA CNEL and above, when unavoidable impacts are identified.
- **Policy N 1.10.** Orient residential units away from major noise sources (in conjunction with applicable building codes).
- **Policy N 1.11.** Maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) 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 assure the compatibility of proposed uses.

### *Los Angeles County Airport Land Use Commission*

The Los Angeles County Airport Land Use Commission's Airport Land Use Plan (adopted in 1991 and revised in 2004) covers all of the public airports in Los Angeles County. The Los Angeles County Airport Land Use Commission is responsible for promoting land use compatibility around the County's airports in order to minimize public exposure to excessive noise and safety hazards, and the Commission's Los Angeles County Airport Land Use Plan identifies noise compatibility zones in the form of airport noise contour graphics that are intended to prevent development that is incompatible with airport operations.

## 5.13.1.2 EXISTING CONDITIONS

### Noise-Sensitive Land Uses

Some land uses are considered more sensitive to noise levels than others due to the duration and nature of time people spend at these uses. In general, residences are considered most sensitive to noise as people spend extended periods of time in them, including the nighttime hours. Therefore, noise impacts affecting rest and relaxation, sleep, and communication are highest at residential uses. Schools, hotels, hospitals, nursing homes, and recreational uses are also considered sensitive to noise because activities at these land uses involve rest, recovery, relaxation, and concentration, and increased noise levels tend to disrupt such activities. Places such as churches, libraries, and cemeteries, where people tend to pray, study, and/or contemplate, are also sensitive to noise, but due to the limited time people spend at these uses, impacts are usually tolerable. Commercial and industrial uses are considered the least noise sensitive.

### Existing Noise Environment

Noise sources are typically categorized as mobile or stationary. Most mobile sources are transportation related from vehicles operating on roadways, fixed railways, and aircraft and airport operations. Off-road construction equipment is also considered a mobile source. Stationary noise sources typically include machinery; fabrication; heating, ventilation, and air conditioning systems; compressors and generators; and landscape maintenance equipment. Stationary noise sources generated by light industrial and commercial activities can result in noise-related land use conflicts when these operations (e.g., loading docks or equipment operations) are adjacent to noise-sensitive land uses.

The communities of interest span the Planning Area. Although they are not directly adjacent to one another, the existing noise environment is similar due to the highly developed nature of the Planning Area. The greatest source of noise throughout the Planning Area is vehicle traffic on local streets and freeways. Designated truck routes on the county's major roadways limit noise nuisances from heavy truck traffic in other areas of the county. Other major noise sources are: fixed and on-site mobile equipment at commercial and industrial uses; parks with active sports fields; playgrounds; athletic and music events; mechanical equipment like heating, ventilation, and air conditioning systems; loading docks and other delivery-related activities; fire stations; and

businesses like car washes, automobile repair including auto body repair, animal board and care, nightclubs, outdoor dining, and drive-throughs, where proximity to sensitive land uses can create noise nuisance concerns.

## Existing Community Noise

The predominant existing noise through the Planning Area is traffic noise on local streets and freeways. In order to quantify existing ambient noise levels in the Westside Planning Area, four 24-hour noise measurements were conducted starting on January 18, 2023, and extending into January 22. These 24-hour noise measurement sites represent typical existing noise exposure at various locations throughout the communities during a typical 24-hour day (see Attachment A of Appendix H). Additionally, ECORP conducted 10 short-term (15-minute) noise measurements on the morning and afternoon of January 15, 2023. These short-term noise measurements represent typical existing noise exposure in the communities during the daytime (see Attachment A). The 15-minute measurements were taken between 10:12 a.m. and 2:05 p.m. The measurement locations, described below, are shown on Figure 5.13-1, *Noise Measurement Locations*, and the results are reported in Table 5.13-5, *Existing (Baseline) Noise Measurements: Long-Term Measurements*, and Table 5.13-6, *Existing (Baseline) Noise Measurements: Short-Term Measurements.*

**Table 5.13-5 Existing (Baseline) Noise Measurements: Long-Term Measurements**

| Location Number | Location Description | CNEL dBA | $L_{eq}$dBA | $L_{min}$dBA | $L_{max}$dBA |
|---|---|---|---|---|---|
| LT 1 | On South Centinela Avenue adjacent to 12025 Waterfront Drive | **70.4** | 66.7 | 43.8 | 98.6 |
| LT 2 | On western side of La Cienega Boulevard adjacent to La Tijera Elementary School | **71.2** | 64.9 | 37.6 | 83.2 |
| LT 3 | On South Verdun Avenue north of the Victoria Burns Art Advisory | **59.2** | 52.6 | 32.2 | 77.9 |
| LT 4 | On La Brea Avenue north of 4701 Slauson Avenue | **76.0** | 71.2 | 42.2 | 99.0 |

Source: ECORP 2024, Appendix H.
Notes: Leq is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. Lmin is the minimum noise level during the measurement period and Lmax is the maximum noise level during the measurement period.
CNEL is a 24-hour average Leq with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

**Table 5.13-6 Existing (Baseline) Noise Measurements: Short-Term Measurements**

| Location Number | Location Description | $L_{eq}$dBA | $L_{min}$dBA | $L_{max}$dBA |
|---|---|---|---|---|
| ST 1 | On parkway south of Hammack Street 100 feet from Centinela Avenue | 58.3 | 51.6 | 74.8 |
| ST 2 | West of Shenandoah Avenue north of 57th Street | 57.4 | 44.4 | 71.8 |
| ST 3 | Southeast corner University Church parking lot | 58.7 | 49.0 | 67.7 |
| ST 4 | On sidewalk of La Tijera Boulevard adjacent to the La Tijera Boulevard / Slauson Avenue bus stop | 59.8 | 46.5 | 75.4 |
| ST 5 | On Overhill Drive east of La Brea Avenue | 67.0 | 43.2 | 82.0 |

**Table 5.13-6 Existing (Baseline) Noise Measurements: Short-Term Measurements**

| Location Number | Location Description | $L_{eq}$dBA | $L_{min}$dBA | $L_{max}$dBA |
|---|---|---|---|---|
| ST 6 | Parkway southeast of intersection of 61st and Citrus Avenue | 52.9 | 35.2 | 74.5 |
| ST 7 | On Valley Ridge Avenue adjacent to Creative Little Stars Preschool Daycare | 61.7 | 36.3 | 77.5 |
| ST 8 | Wayfinder Family Services parking lot adjacent to Angeles Vista Boulevard | 68.1 | 51.3 | 83.9 |
| ST 9 | Homeland Drive and Victoria Avenue | 60.3 | 45.0 | 76.3 |
| ST 10 | On West Boulevard between 54th Street and 57th Street | 60.0 | 38.0 | 77.8 |

Source: ECORP 2024, Appendix H.
Notes: Leq is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. Lmin is the minimum noise level during the measurement period and Lmax is the maximum noise level during the measurement period.

As shown in Table 5.13-5, the long-term noise measurements resulted in ambient noise levels ranging from 59.2 to 76.0 dBA CNEL; as shown in Table 5.13-6, the ambient recorded noise levels range from 52.9 dBA to 68.1 dBA $L_{eq}$. The most common noise in the Planning Area is motor vehicles (e.g., cars, trucks, buses, motorcycles) on area roadways and local highways.

### *Existing Traffic Noise*

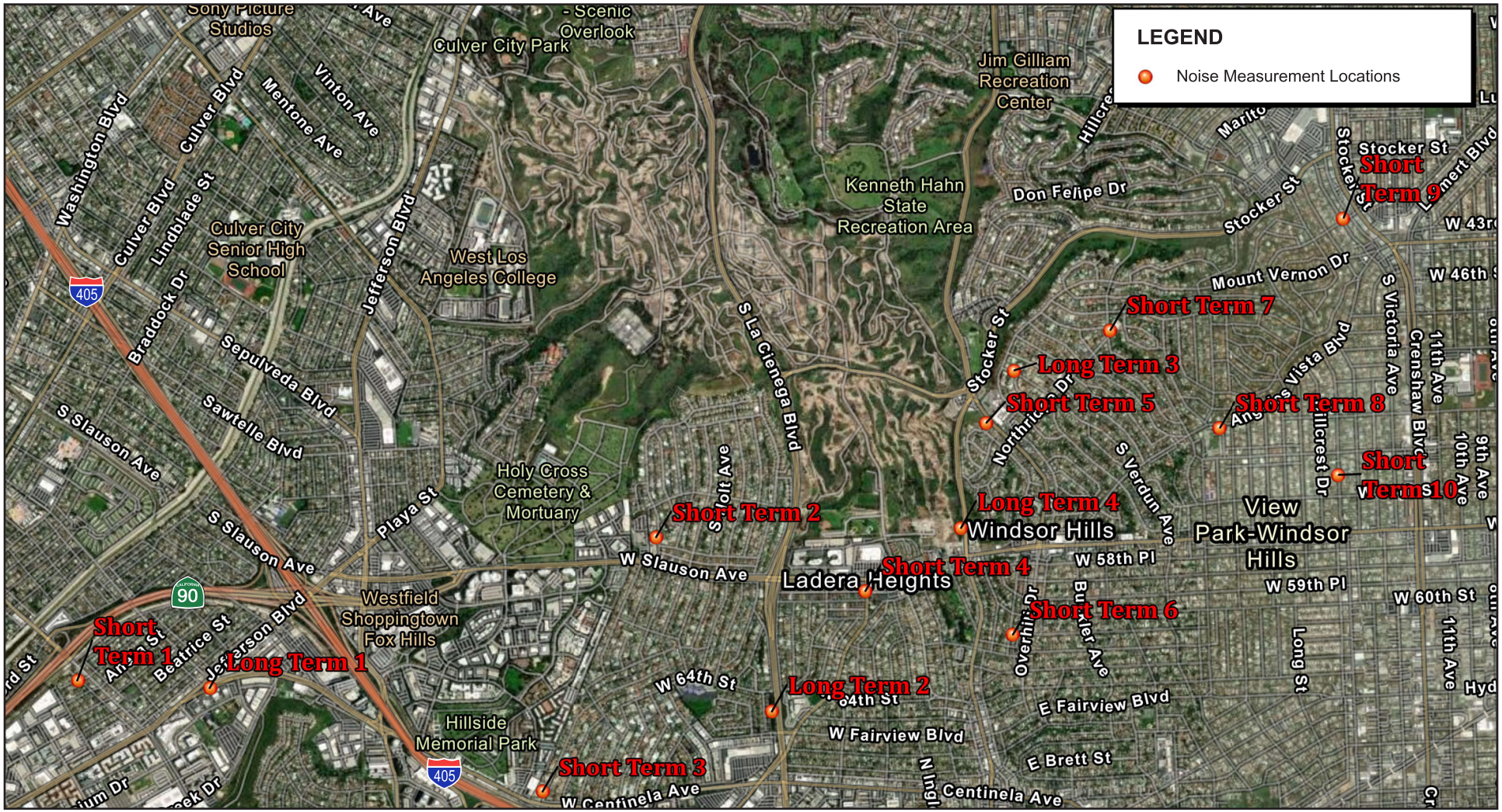
Traffic noise levels depend primarily on the speed of the traffic and the volume of heavy-duty vehicles (trucks). The primary source of noise from automobiles is high-frequency tire noise, which increases with speed. Trucks and older automobiles produce engine and exhaust noise, and trucks can also generate wind noise. Tire noise from cars is produced at ground level (i.e., where the tire contacts the road), whereas truck noise can be generated at a height of 10 to 15 feet above the road, depending on the height of the exhaust pipe(s) and engine.

As previously described, the dominant noise source in the Planning Area is vehicle traffic on its roadways. Traffic noise in the Planning Area is a pervasive issue that impacts the daily lives of residents and other noise-sensitive land uses. With its sprawling urban landscape and extensive network of highways, freeways, and busy local streets, the county is often characterized by persistent vehicular noise.

### *Existing Rail Noise*

Los Angeles County has an extensive rail network that is focused on the efficient and safe movement of people and goods throughout the region. For transporting people via rail lines, there are three systems that operate in the county: Metro, Metrolink, and Amtrak. For the movement of goods, the Southern Pacific Railway and the Union Pacific Railway operate between the ports of Los Angeles and Long Beach and the central Los Angeles freight yard transfer stations, with connections onward to the transcontinental rail network. No communities of interest in the Planning Area are adjacent to or have rail lines running through them. As such, allowed projects within the Planning Area would not be impacted by rail noise.

## Figure 5.13-1 - Noise Measurement Locations Map




*Source: ECORP Consulting 2023.*

# 5. Environmental Analysis
## NOISE

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### *Existing Aircraft Noise*

The County occasionally experiences noise from aircraft departing from and arriving at area airports. There are two airports near the communities of interest in the Planning Area: the Los Angeles International Airport (LAX) south of the Marina Del Ray/ Ballona Wetlands community and the Santa Monica Municipal Airport south of the West Los Angeles community. LAX is approximately 2.0 miles south of Ladera Height, approximately 3.0 miles south of View Park and Windsor Hills, and 2.7 miles south of West Fox Hills. The Santa Monica Municipal Airport is located 2.5 miles north of West Fox Hills and over 4 miles northwest of Ladera Heights, View Park, and Windsor Hills. The Los Angeles County Airport Land Use Commission's Airport Land Use Plan (adopted in 1991 and revised in 2004) covers all the public airports in Los Angeles County, including the Los Angeles International Airport and the Santa Monica Municipal Airport. The Los Angeles County Airport Land Use Commission is responsible for promoting land use compatibility around the County's airports to minimize public exposure to excessive noise and safety hazards, and the Commission's Los Angeles County Airport Land Use Plan identifies noise compatibility zones in the form of airport noise contour graphics that are intended to prevent development that is incompatible with airport operations. None of the communities of interest in the Planning Area are within the 65 dBA noise contours of either of these airports or any airport in the county.

## 5.13.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

N-1 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.

N-2 Generation of excessive groundborne vibration or groundborne noise levels.

N-3 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, if the project would expose people residing or working in the project area to excessive noise levels.

### Thresholds of Significance for Noise

Consistent with provisions of the County Noise Ordinance as described above, construction activities lasting more than 10 days would result in a significant noise impact should on-site construction activities exceed the applicable noise threshold established by the County Code Chapter 12.08, Noise Control, of 60 dBA $L_{eq}$ at single-family residences and mobile homes, 65 dBA $L_{eq}$ at multifamily residences, or 70 dBA $L_{eq}$ at semi-residential/commercial land uses. Off-site construction traffic impacts would be considered significant if Project construction traffic noise would exceed 75 dBA $L_{eq}$ at single-family residences and mobile homes, 80 dBA $L_{eq}$ at multifamily residences, or 85 dBA $L_{eq}$ at transient lodging.

Vehicle traffic noise during Project operation would have a significant noise impact if it would increase existing without-Project traffic noise levels by 5 dBA CNEL or more at a sensitive land use currently experiencing "normally acceptable" or "conditionally acceptable" noise levels; or increase ambient noise levels by 3 dBA CNEL or more at a sensitive land use currently experiencing "normally unacceptable" or "clearly unacceptable" noise levels.

### Thresholds of Significance for Vibration

#### *Federal Transit Administration and California Department of Transportation*

The criteria for environmental impact from groundborne vibration are based on the maximum levels for a single event. Table 5.13-1 and Table 5.13-2, above, list the potential vibration damage criteria associated with construction activities, as suggested in *Transit Noise and Vibration Impact Assessment* (FTA 2018).

FTA guidelines show that a vibration level of up to 102 VdB (equivalent to 0.5 inch/sec in RMS) (FTA 2018) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster) and would not result in any construction vibration damage. For a nonengineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 inch/sec in RMS). The RMS values for building damage thresholds referenced above are shown in Table 5.13-2, which is taken from the *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

Based on Table 8-3 in the FTA's *Transit Noise and Vibration Impact Assessment* (FTA 2018), interpretation of vibration criteria for detailed analysis is 78 VdB for residential uses during daytime hours. During nighttime hours, the vibration criterion is 72 VdB. For office and commercial buildings, the FTA guidelines suggest that a vibration level of 84 VdB should be used for detailed analysis.

#### *Los Angeles County Noise Ordinance*

The County Noise Ordinance, Section 12.08.350, provides a presumed perception threshold of 0.01 in/sec RMS. The vibration level of 0.01 in/sec RMS is equivalent to 0.04 in/sec PPV. In addition, guidelines recommended by the FTA and Caltrans on structural damages and human annoyance are also referenced in this impact analysis.

## 5.13.3 Environmental Impacts

### 5.13.3.1 METHODOLOGY

This is a program-level analysis that considers the potential impacts of the implementation of the WSAP and its future projects that could be facilitated by land use and zoning changes in the WSAP. There are no specific development projects proposed at this time; therefore, this Draft PEIR qualitatively addresses noise impacts associated with the future potential buildout of the proposed Planning Area. To capture the potential noise and vibration impact of future development with implementation of the Westside Area Plan, this analysis utilizes the baseline existing conditions described above and analyzes the impacts of urban development qualitatively.

Marina del Rey, Ballona Wetlands, and West Los Angeles (Sawtelle VA) are governed by separate planning processes and are not anticipated to undergo land use changes as a result of the proposed Project. The WSAP focuses primarily on Opportunity Sites in Ladera Heights, View Park, and Windsor Hills and West Fox Hills, therefore, accordingly, the analysis focuses on noise-related impacts to these areas.

### 5.13.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

The WSAP is intended to guide long-term growth of the WSAP area, promote active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to foster economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to support sustainable mobility options in an enhanced built environment.

Because the WSAP is planning for future growth within the Planning Area, no actual development is being proposed at this time.

There are no goals and policies in the WSAP related to noise or noise reduction.

### 5.13.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.13-1: 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? [Threshold N-1]**

#### Construction

**Significant and Unavoidable Impact.** Because the proposed Project is the planning of future growth within the Planning Area, no actual development is being proposed at this time. This section includes an overview of the typical methods, equipment, and work force that would be used for construction of the individual project within the Planning Area. As a program EIR, this Draft PEIR does not speculate on the specific environmental impacts of individual projects that could be facilitated by adoption of the WSAP. As such, construction noise is discussed qualitatively taking into consideration typical construction methods, types of equipment used, and equipment usage time. Despite the variety in types and sizes of construction equipment used for various projects within the Planning Area, similarities in the dominant noise sources and patterns of operation allow construction-related noise to be analyzed in such a way for this analysis.

Construction noise associated with future projects facilitated by the proposed Project would result in short-term noise impacts associated with demolition and various construction activities. Construction activities would involve both off-road construction equipment (e.g., excavators, dozers, cranes, etc.) and transport of workers and equipment to and from construction sites. Table 5.13-7, *Reference Construction Equipment Noise Levels (50 Feet From Source)*, shows typical noise levels produced by the types of off-road equipment that would likely be used

during future construction in the Planning Area. Future development in the Planning Area could potentially require installation of pile foundations that may utilize impact pile drivers or similar equipment that may be expected to generate high noise levels.

**Table 5.13-7 Reference Construction Equipment Noise Levels (50 Feet From Source)**

| Equipment | Typical Noise Level (dBA) at 50 feet from Source | |
|---|---|---|
| | $L_{max}$ | $L_{eq}$ |
| Aerial Lift | 74.7 | 67.7 |
| Air Compressor | 77.7 | 73.7 |
| Backhoe | 77.6 | 73.6 |
| Blasting | 94.0 | 73.0 |
| Boring Jack (Power Unit) | 83.0 | 80.0 |
| Boring Jack (Horizontal) | 82.0 | 76.0 |
| Chain Saw | 83.7 | 76.7 |
| Compactor (Ground) | 83.2 | 76.2 |
| Concrete Mixer Truck | 78.8 | 74.8 |
| Concrete Mixer (Vibratory) | 80.0 | 73.0 |
| Concrete Pump Truck | 81.4 | 79.4 |
| Concrete Saw | 89.9 | 82.6 |
| Crane | 80.6 | 72.6 |
| Dozer | 81.7 | 77.7 |
| Drill Rig | 84.4 | 77.4 |
| Drill Rig Truck | 79.1 | 72.2 |
| Drum Mixer | 80.0 | 77.0 |
| Dump Truck | 76.5 | 72.5 |
| Excavator | 80.7 | 76.7 |
| Front End Loader | 79.1 | 75.1 |
| Generator | 80.6 | 77.6 |
| Gradall | 83.4 | 79.4 |
| Grader | 85.0 | 81.0 |
| Hydraulic Break Ram | 90.0 | 80.0 |
| Impact Hammer/Hoe Ram (Mounted) | 90.3 | 83.3 |
| Jackhammer | 88.9 | 81.9 |
| Other Equipment | 85.0 | 82.0 |
| Pavement Scarifier | 89.5 | 82.5 |
| Paver | 77.2 | 74.2 |
| Pile Driver (Impact) | 101.3 | 94.3 |
| Pile Driver (Vibratory) | 100.8 | 93.8 |

**Table 5.13-7 Reference Construction Equipment Noise Levels (50 Feet From Source)**

| | | |
|---|---|---|
| Pneumatic Tools | 85.2 | 82.2 |
| Pumps | 80.9 | 77.9 |
| Rock Drill | 81.0 | 74.0 |
| Roller | 80.0 | 73.0 |
| Scraper | 83.6 | 79.6 |
| Tractor | 84.0 | 80.0 |
| Truck (Flat Bed) | 74.3 | 70.3 |
| Truck (Pick Up) | 75.0 | 71.0 |
| Vacuum Street Sweeper | 81.6 | 71.6 |
| Welder | 74.0 | 70.0 |

Source: ECORP 2024, Appendix H.

Construction noise is currently a substantial source of temporary noise in the county as well as the Planning Area and will continue to be so regardless of whether the WSAP is implemented. Current noise levels near individual construction sites associated with development and activities under the WSAP would not be substantially different from what was experienced during the baseline noise measurements. Since specific future projects are unknown at this time, it is conservatively assumed that the construction areas associated with these future projects could be located within 50 feet of sensitive land uses. As depicted in Table 5.13-7, noise levels generated by individual pieces of construction equipment typically range from approximately 74 dBA to 101.3 dBA $L_{max}$ at 50 feet and 67.7 dBA to 94.3 dBA $L_{eq}$ at 50 feet. Average hourly noise levels associated with construction projects can vary, depending on the activities performed, equipment used, and equipment usage time. Short-term increases in vehicle traffic, including worker commute trips and haul truck trips, may also result in temporary increases in ambient noise levels at nearby receptors. During each stage of construction, a different mix of equipment would operate, and noise levels would vary based on the amount of equipment on-site and the location of the activity. Construction noise levels drop off at a rate of about 6 dBA per doubling of distance between the noise source and the receptor. Intervening structures or terrain would result in lower noise levels at distant receivers.

The County Code Section 12.08.440 states that construction work is prohibited between 7:00 p.m. and 7:00 a.m. or at any time on Sundays or holidays, such that the sound creates a noise disturbance across a residential or commercial property line. Additionally, Section 12.08.440 presents construction noise standards at various land uses for mobile and stationary construction equipment lasting more than 10 days (see Section 5.13.1.1).

Future projects within the Planning Area would be required to adhere to County code requirements. Additionally, if certain future projects require discretionary action, a CEQA analysis would be conducted on a case-by-case basis as specific land use development projects are proposed, which would determine the level of significance based on each individual project's site plan specifics. The employment of mitigation measures that reduce construction noise, such as the use of temporary noise barriers, ensures that the majority of construction-related noise impacts would be mitigated to levels below County construction noise thresholds.

Noise barriers or enclosures can provide a sound reduction of 35 dBA or greater (WEAL 2021). To be effective, a noise enclosure/barrier must physically fit in the available space, must completely break the line of sight between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. However, due to the nature of construction, even with mandatory adherence with the County Code, it is possible that some projects would be large enough in size, intensity, and proximity to noise-sensitive land uses that construction noise levels could exceed significance thresholds in the County Code. Therefore, though the majority of individual future projects allowed under the WSAP would be able to be mitigate construction noise levels below County noise limits, there is the potential that some future construction projects could result in significant construction noise levels that are unable to be reduced to levels below County standards. Therefore, this impact is significant.

### Operation

**Significant and Unavoidable Impact.** This section describes the activities relating to the operation of future development that could occur with adoption of the WSAP, including from vehicular traffic and potential future on-site noise-generating equipment and activity at each individual project site.

The WSAP would encourage new developments while maintaining the character of existing residential neighborhoods to achieve the goals of the WSAP as described in Chapter 3, *Project Description*. Future development within the Planning Area could introduce new stationary sources of noise. The development of residential and non-residential uses under the WSAP could generate substantial stationary noise. Such sources could generate noise from heating, ventilation, and air conditioning (HVAC) mechanical equipment, back-up diesel generators in some cases, parking lot activity, backup beepers from internal truck and equipment maneuvering, and other sources. Table 5.13-8, *Reference Stationary Source Noise Levels (at the Source)*, identifies noise levels generally associated with common stationary noise sources.

**Table 5.13-8 Reference Stationary Noise Levels (at the Source)**

| Stationary Noise Source | $L_{eq}$ |
|---|---|
| Commercial Car Wash[a] | 79.1 dBA |
| Drive Thru Activity (speaker)[b] | 89.1 dBA |
| Gasoline Dispensing Station[c] | 64.7 dBA |
| Generators[d] | 75.0 dBA |
| HVAC Mechanical Equipment[e] | 56.8 dBA |
| Parking Garage[f] | 52.6 dBA |
| Regional Shopping Center Parking Lot[g] | 61.1 dBA |
| Small Parking Lot[h] | 53.2 dBA |
| Tire and Lube Service Station[i] | 62.3 dBA |
| Truck Backup Beeper[j] | 79.0 dBA |
| Truck Yard/Warehouse[k] | 62.4 dBA |

Source: ECORP 2024, Appendix H.
Notes:
a. The average of two noise measurements conducted at commercial carwashes in 2019 and 2022.
b. The average of six noise measurements conducted within fast food restaurant drive thru while drive thru speaker in use.
c. The average of five noise measurements conducted within the fuel canopy of gasoline dispensing stations in 2019 and 2021.
d. Generac Mobile Diesel Generator Set Specification Sheet 2020.
e. One noise measurement conducted at an operating HVAC unit in 2017.
f. One noise measurement conducted within a parking garage in 2019.
g. One noise measurement conducted within a Safeway parking lot in 2019.
h. The average of three noise measurements conducted within a strip mall parking lot in 2022, hotel parking lot in 2021, and medical facility parking lot in 2020.
i. The average of two noise measurements conducted at a Big O Tires in 2019 and a Jiffy Lube in 2022.
j. City of San Jose 2014 Midpoint at 237 Loading Dock Noise Study.
k. The average of five noise measurements conducted at four truck yards and one distribution center in 2021.

Stationary source noise is currently a substantial source of noise within the Planning Area and will continue to be so regardless of whether the proposed WSAP is adopted. Noise levels near individual sources under the proposed WSAP would not be substantially different from what they would be under current conditions. The potential significance of stationary source noise levels during operations would be determined by the types of equipment used and the locations of future projects. While stationary noise sources could exist within current developments, there is also the possibility of future new developments under the WSAP being situated near noise-sensitive receptors. The County's noise-protecting General Plan Policy N1.3 seeks to 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. The employment of noise barriers designed and built to block the transmission of noise from a stationary source to a sensitive receptor is a highly effective noise-reducing mitigation on stationary noise sources. As previously described, noise barriers or enclosures can provide a sound reduction of 35 dBA or greater (WEAL 2021). Furthermore, General Plan Policy N1.11 seeks to maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) to prevent noise and vibration transfer from commercial/light industrial uses.

Future projects within the Planning Area would be required to adhere to County code requirements. Additionally, future discretionary projects within the Planning Area would be required to conduct a CEQA analysis on a case-by-case basis as they are proposed, which would determine the level of significance based on

each individual project's specific noise-generating components. However, even with mandatory compliance with the General Plan and County Code, it is possible that some future projects in the Planning Area would be large enough in scale and intensity and/or located near noise-sensitive receptors, such that stationary source noise levels could exceed the exterior noise standards for various land uses presented in Table 5.13-4. Thus, this impact would be significant.

### *Traffic Noise Impacts*

Future development and activities allowed under the WSAP are expected to affect the community noise environment mainly by generating additional traffic. New land uses, such as residential and commercial land uses that are a focus of the WSAP, lead to an increase in the number of vehicles on the roads as residents, employees, and visitors commute to and from these locations. According to the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (2013), a doubling of traffic on a roadway is required for an increase of 3 dB (outside of the laboratory, a 3 dBA change is considered a just-perceivable difference). Future development allowed under the WSAP could introduce new land uses to the communities that would result in an increase in traffic noise impacting noise-sensitive receptors. The size and types of the future land use projects in the Planning Area would influence the number of trips contributed to area roadways.

As previously described, the County's noise-protecting General Plan Policy N1.3 seeks to 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. General Plan Policy N1.4 requires the County to enhance and promote noise abatement programs in an effort to maintain acceptable levels of noise as defined by the Los Angeles County Exterior Noise Standards (see Table 5.13-4) and other applicable noise standards, while Policy N1.7 mandates the use of traffic management and noise suppression techniques to minimize noise from traffic and transportation systems. Policy N1.10 requires the orientation of residential units away from major noise sources, including traffic facilities (in conjunction with applicable building codes). Finally, County General Plan Policy N1.12 states that all 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.

Future projects within the Planning Area would be required to adhere to County code requirements. Additionally, future discretionary projects within the Planning Area would be required to conduct a CEQA analysis on a case-by-case basis as they are proposed, which would determine the level of significance based on each individual project's specific noise-generating components, including a project's contribution to off-site traffic noise. An industry standard for addressing increases in traffic noise includes the FICON standards of significance, described in detail in Section 5.13.1.1 under "Federal Interagency Committee on Noise." These standards provide guidance on how to analyze significant changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise and are widely used in CEQA analyses.

Nonetheless, even with application of FICON standards and mandatory compliance with the General Plan and County Code, it is possible that some future projects in the Planning Area would be large enough in scale and intensity and/or located near noise-sensitive receptors, such that transportation source noise levels could exceed

the applicable noise standard. It is noted that the mitigation of traffic source noise impacts can be difficult in that lead agencies have limited remedies at their disposal to effectively reduce traffic-related noise. Addressing traffic noise at the receiver rather than the source usually takes the form of noise barriers (i.e., sound walls). While constructing noise barriers along streets would reduce noise, the placement of sound walls between existing residences/businesses and local roadways would not be desirable as it would conflict with the community's aesthetic, design, and character and is therefore deemed infeasible. Furthermore, such barriers would likely require property owner approval, which cannot be ensured. This impact would be significant.

**Impact 5.13-2 Would the project result in generation of excessive groundborne vibration or groundborne noise levels? [Threshold N-2]**

## Construction

**Significant and Unavoidable Impact.** Construction vibration is a potential occurrence within the Planning Area and will continue to be so regardless of whether the WSAP is adopted. Construction-related vibration near individual construction sites associated with future development under the proposed Project would not be substantially different from what it would be under existing conditions. Construction activities could occur in a variety of locations throughout the WSAP and will most likely require the use of off-road equipment known to generate some degree of vibration. Construction activities that generate excessive vibration, such as blasting, would not be expected to occur from future development under the WSAP due to the geography and limited undeveloped land in the Planning Area, which reduces the likelihood of blasting during construction. Receptors sensitive to vibration include structures (especially older masonry structures), people (especially residents, the elderly, and the sick), and equipment (e.g., magnetic resonance imaging equipment, high resolution lithographic, optical and electron microscopes). Regarding the potential effects of groundborne vibration to people, except for long-term occupational exposure, vibration levels rarely affect human health.

The majority of construction equipment is not situated at any one location during construction activities, but spread throughout a construction site and at various distances from sensitive receptors. Since specific future projects under the WSAP are unknown at this time, it is conservatively assumed that the construction areas associated with these future projects could be within 50 feet of sensitive structures. The primary vibration-generating activities would occur during grading, placement of underground utilities, and construction of foundations. Table 5.13-9, *Representative Vibration Source Levels for Construction Equipment*, shows the typical vibration levels produced by construction equipment at 50 feet.

**Table 5.13-9 Representative Vibration Source Levels for Construction Equipment**

| Equipment | Peak Particle Velocity at 50 Feet (in/sec) |
|---|---|
| Pile Driver (Impact) | 0.225 |
| Pile Driver (Sonic) | 0.059 |
| Vibratory Roller | 0.073 |
| Hoe Ram | 0.031 |
| Large Bulldozer | 0.031 |
| Caisson Drilling | 0.031 |
| Loaded Trucks | 0.026 |
| Jackhammer | 0.012 |
| Small Bulldozer | 0.001 |

Source: ECORP 2024, Appendix H.
Notes: PPV = peak particle velocity; Lv = velocity in decibels; in/sec = inches per second; VdB = vibration velocity decibels

County Code Section 12.08.560 prohibits the operation of any device that creates a vibration that is above 0.01 in/sec. Depending on the proximity of the future developments to vibration-sensitive receptors, construction activities could generate excessive ground vibration and potentially exceed 0.01 in/sec. The size, intensity, and locations of future projects allowed under the WSAP would dictate whether the level of groundborne vibration and groundborne noise during construction would be above or below the significance thresholds. Future projects in the Planning Area would be required to adhere to County code requirements. Additionally, future discretionary projects in the Planning Area would be required to conduct a CEQA analysis on a case-by-case basis as projects are proposed. There is potential that some future construction projects could result in significant construction vibration levels that are unable to be reduced to levels below County standards. Therefore, this impact is significant.

### *Human Annoyance*

Depending on the proximity of the future developments to vibration-sensitive receptors, construction activities could generate excessive ground vibration and potentially exceed the human annoyance criteria for surrounding receptors. The size, intensity, and locations of the future projects would dictate whether the level of groundborne vibration and groundborne noise during construction would be above or below the significance thresholds. Any future discretionary project facilitated by adoption of the WSAP would be required to conduct its own applicable CEQA analysis and would determine significance based on the individual project's specifics. It is possible that some future projects facilitated by adoption of the WSAP would be large enough in scale and/or intensity, or located near vibration-sensitive receptors, such that multiple pieces of equipment or other sources of groundborne vibration and/or groundborne noise would cause levels to exceed the specified limits in the FTA's *Transit Noise and Vibration Impact Assessment Manual* and Caltrans's *Transportation and Construction Vibration Guidance Manual*. Therefore, this impact is significant.

## Operation

**Less Than Significant Impact.** Caltrans has studied the impacts of propagation of vehicle vibration on sensitive land uses and notes that "heavy trucks, and quite frequently buses, generate the highest earth borne vibrations of normal traffic" (Caltrans 2013). Caltrans further notes that the highest traffic-generated vibrations are along freeways and State routes. Their study finds that "vibrations measured on freeway shoulders (5 m [meters] from the centerline of the nearest lane) have never exceeded 2 mm/s [millimeters per second], with the worst combinations of heavy trucks" (Caltrans 2013). "This amplitude coincides with the maximum recommended 'safe level' for ruins and ancient monuments (and historic buildings)" (Caltrans 2013). A vibration level of 2 millimeters per second is approximately 0.08 in/sec.

Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Vehicles traveling along freeways and State routes would cause infrequent and inconsistent vibration events that would attenuate quickly after onset. Sensitive receptors would likely be located further than 15 meters from a freeway or highway, and would therefore experience levels lower than 0.08 in/sec. Further, the FTA guidelines state that buildings that are extremely susceptible to building damage (e.g., historic buildings) could experience structural damage at 0.12 in/sec, and Caltrans defines its threshold for extremely fragile buildings at 0.08 in/sec from continuous or frequent intermittent sources (FTA 2018; Caltrans 2020). Thus, roadway traffic is not expected to generate excessive vibration in excess of the FTA's threshold of 0.12 in/sec or Caltrans's threshold of 0.08 in/sec for extremely susceptible buildings, and associated impacts would be less than significant. Similarly, the infrequent and inconsistent vibration events combined with typical distances of buildings from freeways and highways would ensure impacts related to human annoyance would be less than significant and no mitigation is required.

It is not anticipated that any projects allowed in the Planning Area would include the use of any stationary equipment that would result in excessive vibration levels. While some land uses may accommodate the use of heavy-duty trucks for deliveries, these vehicles can only generate groundborne vibration velocity levels of 0.006 inches per second at 50 feet under typical circumstances. Additionally, according to the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), stationary equipment such as pumps and compressors generate groundborne vibration levels of 0.5 in/sec at one foot and 0.004 in/sec at 25 feet (ASHRAE 1999). It is anticipated that any future development that would install such equipment would locate it on the future project building rooftop or within or near project buildings such that the equipment would not generate groundborne vibration off the project site. Therefore, groundborne vibration from the operations is not expected to exceed the County standard. Impacts would be less than significant.

**Impact 5.13-3: Would the 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, expose people residing or working in the project area to excessive noise levels? [Threshold N-3]**

**No Impact.** Aircraft overflights occur regularly in the Planning Area, which has multiple airports. Two airports are near Ladera Heights, View Park, and Windsor Hills and West Fox Hills—LAX is south of the Marina Del Ray/Ballona Wetlands community, and the Santa Monica Municipal Airport is south of the West Los Angeles

community. As previously described, the Los Angeles County Airport Land Use Commission's Airport Land Use Plan (adopted in 1991 and revised in 2004) covers all the public airports in the county. The Commission is responsible for promoting land use compatibility around the county's airports to minimize public exposure to excessive noise and safety hazards, and the Commission's Los Angeles County Airport Land Use Plan identifies noise compatibility zones in the form of airport noise contour graphics that are intended to prevent development that is incompatible with airport operations. No communities in the Planning Area are within the 65 dBA noise contours, or any noise contours, for airports within the Planning Area. Therefore, no impact would occur.

## 5.13.4 Cumulative Impacts

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable probable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impacts is "cumulatively considerable" ( and thus significant in and of itself). The cumulative geographic study area used to assess potential cumulative noise-related impacts include the Planning Area and adjacent cities. However, air travel related noise impacts are generally site specific and do not combine with other projects resulting in a cumulative impact.

**Impact 5.13-4: 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? [Threshold N-1]**

**Significant and Unavoidable Impact.** The geographic context for the analysis of cumulative noise impacts is the unincorporated county within the Planning Area, which includes the sites of future development facilitated by adoption of the WSAP. Specifically, the geographic context for the evaluation of cumulative construction noise impacts and stationary source operational noise impacts is generally very small (i.e., a few hundred feet). Noise diminishes rapidly with distance—6 dBA per doubling of distance for point and stationary sources over acoustically "hard" sites such as asphalt and concrete surfaces, and 7.5 dBA per doubling of distance over acoustically "soft" sites such as soft dirt, grass or scattered bushes, and trees. For cumulative operational noise impacts from traffic, the geographic context is generally larger; thus, overall growth in the Planning Area is considered when assessing potential cumulative traffic noise impacts. Cumulative impacts could result at various locations within this area from initiation of on-the-ground work in furtherance of a project facilitated by adoption of the WSAP and could last in perpetuity.

Past, present, and reasonably foreseeable future projects, including projects implemented in accordance with General Plan and County Code requirements (see, for example, DRP 2015), have affected and can be expected to continue to affect the noise environment in locations that could be affected by the construction and operation of projects facilitated by adoption of the WSAP. If the combination of the incremental noise impacts of future development under the WSAP and the incremental impacts of cumulative projects would not exceed established thresholds, then no significant cumulative impact would exist. However, the Project's incremental significant impact could cause a significant cumulative impact to occur if multiple projects facilitated by

adoption of the WSAP were to generate noise in sufficient geographic proximity to one another and one or more noise-sensitive receptors. For example, past, present, or reasonably foreseeable future projects built near a project facilitated by adoption of the WSAP could contribute traffic noise levels that, when combined with the incremental increase of future projects, could result in a doubling of traffic volumes and result in noise levels greater than the 3 dBA threshold, and thus, a significant cumulative impact. Similarly, if incremental noise impacts of the Project were to combine with the incremental impacts of cumulative projects so as to exceed established thresholds, then a significant cumulative impact also would occur.

### Construction

With respect to construction, an increase in noise at sensitive uses would occur as a result of the construction of specific development projects allowed under the proposed WSAP along with other construction in the vicinity. Where projects in the vicinity adjoin the construction of specific development projects allowed under the proposed WSAP, the combined construction noise levels would have a cumulative effect on nearby sensitive uses. Noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels, but would result in a 3 dBA increase over a single source. However, cumulative construction noise levels could be in excess of the County's noise standards, thus potentially resulting in a cumulative construction noise impact.

Determining the exact location and potential noise levels of future construction activities would be considered speculative at this time. Further, construction noise levels would be considered a temporary nuisance, as the increase in noise levels would only occur during the use of construction equipment associated with each specific development project. As discussed earlier, construction at each site within the WSAP area will be required to comply with the County's noise ordinance. Nonetheless, it is possible that construction of future projects under the WSAP and other projects in the vicinity could occur at the same time and in proximity to each other and sensitive receptors. Therefore, cumulative construction noise impacts could be potentially significant despite implementation of Mitigation Measure N-1. Cumulative impacts during construction are considered significant and unavoidable.

### Operation

Permanent increases in noise would occur primarily as a result of increased traffic on local roadways due to development under the proposed WSAP and ambient growth throughout the region. Related development in adjacent jurisdictions may contribute traffic to the roadway network. Although it is not anticipated, roadway volumes under the 2045 with-Project scenario compared to existing conditions have the potential to be doubled. Therefore, there is a potential for an increase of 3 dBA when compared to existing conditions. As a result, it is reasonably determined that projects facilitated by adoption of the WSAP have the potential to result in a cumulatively considerable increase in traffic noise impacts, and such impacts would be cumulatively significant.

With respect to stationary operational noise, an increase in noise at sensitive uses would occur as a result of the operation of specific development projects allowed under the proposed WSAP along with other projects in the vicinity. Where projects in the vicinity adjoin the operation of specific development projects allowed under the proposed WSAP, the combined operational noise levels would have a cumulative effect on nearby sensitive uses. Noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels, but

would result in a 3 dBA increase over a single source. However, cumulative operational noise levels could be in excess of the County's noise standards, thus potentially resulting in a cumulative operational noise impact.

Determining the exact location and potential noise levels of future operational activities would be considered speculative at this time. As discussed earlier, stationary operational noise sources at each site within the WSAP area will be required to comply with the County's noise ordinance. Nonetheless, it is possible that the operation of future projects under the WSAP and other projects in the vicinity could occur in proximity to each other and sensitive receptors. Therefore, the cumulative stationary operational noise impacts could be potentially significant. Despite implementation of Mitigation Measures N-1 and N-2, cumulative impacts would remain significant and unavoidable. As such, cumulative impacts during future operations are considered significant and unavoidable.

**Impact 5.13-5: Would the project result in generation of excessive groundborne vibration or groundborne noise levels? [Threshold N-2]**

**Significant and Unavoidable Impact.** Vibration attenuates rapidly from the source. For example, vibration levels of 2 mm/s (i.e., approximately 0.08 in/sec) represent a worst-case scenario for vibration propagated by vehicles (Caltrans 2013) and, according to ASHRAE, stationary equipment such as pumps and compressors generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot (ASHRAE 1999). At 25 feet, this vibration level drops to approximately 0.004 in/sec PPV at 25 feet (approximately 60 VdB). Therefore, to cause or contribute to a significant cumulative vibration impact, sources of vibration would have to be generating vibration at the same time sufficiently close to a vibration-sensitive receptor.

Past, present, and reasonably foreseeable future projects, including projects implemented in accordance with the WSAP and municipal code requirements (see, e.g., DRP 2015), have affected and can be expected to continue to affect vibration levels in the unincorporated areas. Construction and operation of projects facilitated by adoption of the WSAP could combine with the incremental vibration impacts of other cumulative projects, which may include truck and bus routes; projects near active railroad tracks (within 200 feet, according to the FTA's vibration screening distances); projects that use construction vehicles or heavy-duty construction equipment typically associated with substantial vibrational impacts (such as pile drivers, jackhammers, impact hammers, and earth compaction tools), or could cause or contribute to a significant impact related to localized groundborne vibration and/or groundborne noise, and thus, disturb nearby receptors or cause structural damage.

Determining the exact location and potential noise levels of future operational activities would be considered speculative at this time. Nonetheless, it is possible that construction of future projects under the WSAP and other projects in the vicinity could occur at the same time and in proximity to each other and sensitive receptors. Despite implementation of Mitigation Measure N-3, cumulative impacts during construction would remain significant and unavoidable. Therefore, cumulative construction vibration impacts are considered significant and unavoidable.

## 5.13.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impact would be less than significant: 5.13-3.

Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.13-1** 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?
- **Impact 5.13-2** Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

## 5.13.6 Mitigation Measures

### Impact 5.13-1 and Impact 5.13-2

N-1 **Construction Noise.** Applicants for future development projects pursuant to implementation of the Westside Area Plan that are within 500 feet of sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the Los Angeles County Department of Public Health (LACDPH) for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the County Noise Ordinance standards (i.e., LACC 12.08.440). All noise-reduction measures approved by LACDPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors.
- Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).
- Limit nonessential idling of construction equipment to no more than five minutes per hour.

This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the County Noise Ordinance standards (i.e., LACC 12.08.440) for development projects within the Westside Area Plan.

N-2 **Operational Noise.** Prior to issuance of a building permit for any future discretionary development projects within the Westside Planning Area that are within 500 feet of sensitive receptors, the project applicant shall submit a noise mitigation plan to LACDPH for review and approval. The noise mitigation plan shall be prepared by a sound engineer and be sufficient for LACDPH to make a determination of whether the project will be in compliance with all applicable County noise standards and regulations. At a minimum, the noise mitigation plan shall include the following information: a list of all electro-mechanical equipment (HVAC, refrigeration systems, generators, etc.) that will be installed at the project site; sound level that would be produced by each piece of equipment; noise-reduction measures, as necessary; and sufficient predictive analysis of project operational noise impact. All noise-reduction measures approved by LACDPH shall be incorporated into the project building plans and implemented during project construction. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install permanent noise-occluding shrouds or screens on operating equipment.
- Maintain all equipment and noise control features in accordance with the manufacturer's specifications.
- Orient equipment vents and other sources of sound emissions away from noise-sensitive receptors and/or behind structures, containers, or natural features.
- Increase distance between the operating equipment and the noise-sensitive receptor(s) of concern, to the maximum extent feasible.
- Install portable sound-occluding barriers to attenuate noise between the source(s) and the noise-sensitive receptor(s).

This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes noise standards for commercial and mixed-use projects within the Westside Planning Area.

N-3 **Construction Vibration.** For future development projects that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, and vibratory rollers) within 300 feet of sensitive receptors within the Westside Area Plan, project applicant shall submit a vibration impact evaluation to LACDPH for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the County's standard of 0.01 inches per second RMS vibration velocity [within the range of 1 to 100 Hz frequency]), project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by LACDPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction

Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:

- Jackhammer: 23 feet
- Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet
- Roller (for site ground compaction or paving): 75 feet
- Impact pile-driving: 280 feet

This mitigation measure shall not apply and is superseded once a Countywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with the County standard of 0.01 inches per second RMS vibration velocity [within the range of 1 to 100 Hz frequency]) for development projects within the Westside Area Plan.

## 5.13.7 Level of Significance After Mitigation

Mitigation Measure N-1 would reduce impacts associated with construction and operational activities. However, because of the potential for construction activities to occur near sensitive uses, and because of the potential intensity of construction activities, it may not be feasible to reduce the impact to a less-than-significant level, and the impact would remain significant and unavoidable. No additional feasible mitigation measures have been identified to further reduce incremental contributions to significant noise impacts. Noise barriers are not always capable of blocking noise at noise-sensitive receptors, particularly those that are elevated above a construction work site, such as residential units that are upgrade of a specific project site. It may not be feasible in all circumstances to install noise barriers with sufficient height to block the line-of-sight for all noise-sensitive receptors due to barrier foundation and wind load restrictions. Therefore, construction noise impacts would be significant and unavoidable.

Mitigation Measure N-2 would reduce impacts associated with stationary-source noise, but because exterior noise levels may still exceed the County's noise land use compatibility criteria despite exterior noise attenuation (i.e., noise controls, sound walls, and/or berms), the impact would remain significant and unavoidable.

Mitigation Measure N-3 would reduce groundborne vibration impacts associated with construction activities. Further reductions of vibration impacts from a construction site could be achieved with the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as a typical land use development project (Caltrans 2020). Per the Caltrans *Transportation and Construction Vibration Guidance Manual*, the wave barrier would need to be at least two-thirds of the seismic wavelength, and the length of the barrier must be at least one wavelength (typical wavelength can be up to 500 feet). In addition, constructing a wave barrier to reduce a project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from

the excavation equipment. In addition, it may not be possible in all circumstances to prohibit the use of construction equipment within certain distances of sensitive receptors because such equipment would be required to construct the various components of a project at the proposed locations. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction. Therefore, vibration impacts from construction activities would be significant and unavoidable.

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# 5. Environmental Analysis
## NOISE

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# 5.14 POPULATION AND HOUSING

This section identifies and evaluates issues related to population and housing to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact including changes in population and demand for housing. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). These comments identify various substantive concerns related to socioeconomic impacts. Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.14.1 Environmental Setting

### 5.14.1.1 REGULATORY BACKGROUND

#### State Laws, Regulations, and Policies

##### *Government Code Section 65580 et seq.*

Government Code Article 10.6. Housing Elements, Section 65580, states that the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order. Governments and private sectors should work cooperatively to expand housing opportunities and accommodate housing needs in California. Furthermore, designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article (California Government Code Section 65580 et seq.).

#### Regional Laws, Regulations, and Policies

##### *Regional Growth Management Policies: Southern California Association of Governments*

SCAG is recognized by the State and federal governments as the regional planning agency for the six-county south coast region that includes Los Angeles County (County). The SCAG Regional Growth Forecast is used as a key guide for developing regional plans and strategies mandated by federal and State governments such as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Program EIR for the RTP/SCS, the Air Quality Management Plan, the Federal Transportation Improvement Program, and the Regional Housing Needs Assessment (RHNA). The RTP/SCS provides detailed growth forecasts by city and county and for the unincorporated areas (SCAG 2024a).

### *Regional Transportation Plan / Sustainable Communities Strategy*

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The regional transportation network envisioned in Connect SoCal would reduce per-capita GHG emissions related to vehicular travel associated with the proposed project and assist in meeting the GHG reduction per capita targets for the SCAG region.

### *Regional Housing Needs Allocation*

The RHNA is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA is allocated by SCAG, with a forecast of housing needs in each jurisdiction of the SCAG region for eight years. The RHNA represents the jurisdiction's share of the projected regional population growth. The future housing needs allocations are broken down by income level so that each jurisdiction is responsible for the development of affordable housing units to meet future housing needs. SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which covers the planning period of October 2021 through October 2029. SCAG staff developed several guiding principles as the basis for the distribution mechanism of the RHNA methodology. The RHNA allocation for jurisdictions is generally higher than the 5th RHNA cycle. Each jurisdiction must receive a share of the regional housing need. This includes planning for housing for all income levels, and consideration of factors that indicate areas with high and low concentrations of access to housing. It is important to emphasize the linkage between the RHNA and other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

The California Department of Housing and Community Development (HCD) provided SCAG with a final regional determination of 1,341,827 units for the 6th cycle RHNA on October 15, 2019. Following the formal distribution of draft RHNA allocations based on the Final RHNA methodology and a separate appeals phase described in Government Code 65584.05 et seq., RHNA allocations were adopted on March 4, 2021, by the SCAG Regional Council; approved by HCD on March 22, 2021; and later modified on July 1, 2021. Based on SCAG's determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the regional existing need for additional housing units has been determined to be 836,857 units, and the regional projected need is 504,970 units (totaling 1,341,827 units) (SCAG 2021).

## Local Laws, Regulations, and Policies

### *Los Angeles County General Plan*

The Los Angeles County General Plan (General Plan) guides policy for land use across the unincorporated County. The following provides a summary of the most applicable goals and policies across applicable General Plan Elements that pertain to the Project and is not a comprehensive list (DPR 2015):

**2021–2029 Housing Element.** The 6th Cycle (2021-2029) Housing Element was adopted by the County Board of Supervisors and certified by HUD in May 2022. It serves as a policy guide to address the comprehensive housing needs of the unincorporated areas of the County. The primary focus of the Housing Element is to ensure decent, safe, sanitary, and affordable housing for current and future residents of the unincorporated areas, including those with special needs (DRP 2021). The Housing Element addresses the County RHNA target of 89,232 residential units and includes an inventory of sites suitable for the development of housing that will accommodate projections identified in the RHNA. Those sites that are currently zoned for other uses or lesser densities must be rezoned accordingly. Should the rezoning be at densities less than those prescribed by the Housing Element, other properties in the planning area would need to be rezoned at higher densities to accommodate the increment of lost density. The Housing Element assumes 4,972 residential units to be developed within the Planning Area to meet the broader unincorporated countywide target of 89,232. Based on the County's occupancy rate of 96 percent, it is anticipated that the 4,972 residential units would yield 4,773 households (occupied residential units).

#### *Land Use Element*

The following Los Angeles County General Plan Land Use Element policies and implementation programs are relevant to population and housing:

**Goal LU 1:** A General Plan that serves as the constitution for development, and a Land Use Policy Map that implements the General Plan's Goals, Policies, and Guiding Principles.

- **Policy 1.1.** Identify and maintain an adequate inventory of sites to accommodate the County's RHNA.

**Goal LU 2:** Community-based planning efforts that implement the General Plan and incorporate public input, and regional and community level collaboration.

- **Policy 2.2.** Encourage multifamily residential and mixed-use developments along major commercial and transportation corridors.

**Goal LU 3:** A development pattern that discourages sprawl, and protects and conserves areas with natural resources and significant ecological areas (SEAs).

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

**Goal LU 5:** Vibrant, livable, and healthy communities with a mix of land uses, services, and amenities.

- **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 5.10.** Encourage employment opportunities and housing to be developed in proximity to one another.

**Goal LU 6:** Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services.

- **Policy 6.3.** Invest public and private resources to rehabilitate and support long-term affordability of naturally-occurring affordable rental housing.

### *Los Angeles County Inclusionary Housing Ordinance*

The County Inclusionary Housing Ordinance requires new residential projects to set aside a percentage of units for affordable housing. The inclusionary housing requirement varies based on housing type, project size, project location, and affordability level. Projects may also satisfy the requirement through off-site new construction (DRP 2020).

### *Los Angeles County Interim and Supportive Housing Ordinance*

The County has adopted the Interim and Supportive Housing Ordinance to encourage the development of housing that is critical to ending homelessness. Interim housing provides short-term stays and various services for people experiencing homelessness until they are connected with permanent housing. Supportive housing is affordable housing combined with a comprehensive array of services that help people who face the most complex challenges to live with stability, autonomy, and dignity (DRP 2022).

## 5.14.1.2 EXISTING CONDITIONS

### WSAP Communities Overview

The unincorporated communities within the Westside Planning Area are home to 32,712 people and 15,425 households[1]. The following is a summary of population, housing, and employment characteristics for the communities in the Planning Area. See also Chapter 4, *Existing Conditions*, for more information.

**Ladera Heights.** The unincorporated community of Ladera Heights is an affluent, Black community adjoining Culver City to the northwest, the Baldwin Hills neighborhood in the City of Los Angeles to the north, Leimert Park to east, and the City of Inglewood to the south. The Inglewood Oil Field and Kenneth Hahn State Recreation Area are immediately east and north of the Ladera Heights neighborhood.

[1] Based on the unincorporated Los Angeles County occupancy rate of 96 percent, the unincorporated communities within the Westside Planning Area have a total of 16,068 residential dwelling units with 15,425 units occupied (households).

As of 2021, more than 6,500 residents reside in Ladera Heights residents primarily work in the service industry (46 percent); finance, insurance, and real estate (24 percent); and retail trade (19 percent), The majority of Ladera Heights residents are homeowners (67.2 percent). Most homes in Ladera Heights are single family or duplex residences, although several hundred residents live in large apartment buildings adjacent to Ladera Center in the southernmost section of the community, known as Lower Ladera.

**View Park-Windsor Hills.** The unincorporated area of View Park-Windsor Hills is immediately east of Ladera Heights. Most residents are homeowners in the community (71.7 percent). Many residents work in similar industries as their Ladera Heights neighbors: service (55 percent), retail trade (21 percent), and finance, insurance, and real estate (8 percent). Most residents in View Park-Windsor Hills live in single-family homes or small apartment complexes.

**West Fox Hills.** The unincorporated area of West Fox Hills, also known by residents as "Del Rey," is a small community south of State Route 90 and west of Interstate 405. Nearby neighborhoods include Playa Vista in the City of Los Angeles to the south and Marina del Rey to the west. It primarily consists of single-family residences with commercial services along Centinela Avenue on the community's eastern boundary, and a large multifamily apartment complex on its southern edge.

**Marina del Rey.** Built in the mid-1960s, Marina del Rey ranks as the second largest man-made harbor in the world, consisting of 401 acres of land and 403 acres of water. It is directly south of Venice Beach, northeast of Playa Vista, and about four miles north of Los Angeles International Airport (LAX). The land area, all owned by the County, has been developed through long-term ground leases into a mixture of boating facilities, public recreation amenities and parks, dining, retail, residential, and office uses.

Marina del Rey is an affluent community that is home to 9,355 people. The vast majority of residents in Marina del Rey are renters (90.5 percent), with only 9.5 percent homeowners. The top three employment sectors for residents are service (54 percent); retail trade (24 percent); and finance, insurance, and real estate (11 percent).

**West Los Angeles (LA)/Sawtelle Veteran Affairs (VA).** The unincorporated community of West LA/ Sawtelle VA is to the west of UCLA and includes the VA facilities owned by the federal government. The facilities provide an array of health, research, administrative, and other services for U.S. veterans. The area also contains the Los Angeles National Cemetery, the final resting place for many war veterans. Over 1,000 veterans temporarily or permanently reside in this unincorporated community.

**Westside Islands: Franklin Canyon and Gilmore Island.** Franklin Canyon and Gilmore Island are two "islands" of land in the Planning Area. Franklin Canyon is in the hills north of the City of Beverly Hills. The majority of Franklin Canyon is a part of the Franklin Canyon Park, a 605-acre park managed by the Mountains Recreation and Conservation Authority. There are no residents in unincorporated Franklin Canyon. Gilmore Island is a small unincorporated parcel of land in the Fairfax neighborhood of the City of Los Angeles at the southeast corner of Genesee Avenue and Beverly Boulevard. It is currently occupied by a parking lot in the CBS Studio complex and has no permanent residents.

## Population

The County estimates that in 2018, 1.1 million people lived in unincorporated areas of the county, representing approximately one-tenth of the County's total population (SCAG 2019). During the period 2000 to 2018, the population of unincorporated County increased faster compared to the previous decade, a result of the housing construction boom and increasing household sizes throughout Southern California in the early 2000s. Population in the unincorporated county grew slightly slower between 2000 and 2018 compared to the County as a whole (see Table 4.14-1, *Population and Housing Estimates and Projections*). SCAG's population forecasts indicate that unincorporated County is estimated to grow from 1.11 million in 2020 to 1.22 million in 2035, and again to 1.27 million in 2040 (SCAG 2019).

**Table 4.14-1 Population and Housing Estimates and Projections**

| Jurisdiction/Measure | Unincorporated Los Angeles County | Los Angeles County |
|---|---|---|
| 2010 Population | 986,050 | 9,519,330 |
| 2018 Population | 1,057,192 | 10,283,330 |
| 2010-2018 AAGR (Population) | 0.9% | 1.0% |
| 2040 Projected Population | 1,273,700 | 11,514,811 |
| 2018-2040 Projected AAGR (Population) | 0.9% | 0.5% |
| 2010 Households | 279,781 | 3,133,771 |
| 2018 Households | 294,730 | 3,338,658 |
| 2010-2018 AAGR (Household) | 0.7% | 0.8% |
| 2040 Projected Households | 392,400 | 3,946,600 |
| 2018-2040 Projected AAGR (Households) | 1.3% | 0.8% |

Source: SCAG 2019
Notes: Households = Occupied Housing Units. AAGR = Annual Average Growth Rate

## Housing

### *Unincorporated County*

Between 2000 and 2018, the total number of households in unincorporated County increased by 14,949 households, or 0.7 percent per year, slower than the same measure for the County as a whole (see Table 4.14-1). Household sizes (number of members) tend to be higher in unincorporated areas, with approximately 23 percent of all households in the unincorporated area having 5 people or more members of the household.

Approximately 295,000 households existed within unincorporated County in 2018, representing less than one-tenth of housing units in Los Angeles County (see Table 4.14-1). By 2040, the number of households in unincorporated County is projected to reach 392,400, reflecting growth of approximately 1.3 percent per year, while the number of households in the overall county is forecast to reach 3.9 million, reflecting slower growth compared to the unincorporated area.

In the County as a whole, almost half of all residential dwelling units were single family detached units in 2018, and another 43 percent were multifamily (see Table 4.14-2, *Los Angeles County Composition of Housing Stock by Type*). In the unincorporated area, by comparison, single-family detached units represented a much larger share of housing units, with a smaller share of single-family attached and multifamily units, reflecting the current suburban nature of several unincorporated areas. Table 4.14-2 summarizes the different types of housing units by percentage in unincorporated County (DRP 2015).

**Table 4.14-2 Los Angeles County Composition of Housing Stock by Type**

| Jurisdiction | Percentage of Unincorporated Los Angeles County | Percentage of Los Angeles County |
|---|---|---|
| Single-family detached | 70.6 | 48.7 |
| Single-family attached | 5.7 | 6.6 |
| Multifamily: 2–4 units | 5.7 | 8.1 |
| Multifamily: 5+ units | 14.6 | 35.0 |
| Mobile homes | 3.4 | 1.6 |

Source: SCAG 2024b.

## *WSAP Communities*

Residential conditions for the two communities that would undergo land use and zoning changes as part of the WSAP, Ladera Hights, View Park, and Windsor Hills and West Fox Hills, are summarized below.

### *Ladera Heights, View Park, and Windsor Hills*

The largest existing land use in the Ladera Heights, View Park, and Windsor Hills planning area is residential, comprising approximately 37 percent of the total area. Of this, 1,048.8 acres (34 percent) is developed with single-family residences, and 103.9 acres (3 percent) are occupied by multi-family housing. Single-family housing is the area's predominant use, with pockets of multi-family housing clustered along several streets, including West Slauson Ave, South La Cienega Boulevard, La Tijera Boulevard, South Fairfax Ave, Overhill Drive, and Stocker Street. A small number of multi-family units are scattered southeast of Angeles Vista Boulevard and along South Victoria Ave. Areas developed with a mix of residential and commercial uses total less than three acres, or less than 0.1 percent of the community. These uses are primarily in the southeast area along West Slauson Ave and West 54th Street.

### *West Fox Hills*

Residential uses in the West Fox Hills community comprise approximately 18.4 acres, or 59 percent of the community's total area. Of this, 14.1 acres (45 percent) is developed with single family residences, and 4.3 acres (14 percent) are occupied by multi-family housing. Single-family housing is the area's predominant use, found throughout the community. Several multi-family buildings are located along Jefferson Boulevard between Grosvenor Boulevard and Centinela Avenue, and on parcels along South Centinela Avenue north of Jefferson Boulevard, interspersed with single-family housing.

## 5.14.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

P-1 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).

P-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

## 5.14.3 Environmental Impacts

### 5.14.3.1 METHODOLOGY

Evaluation of impacts related to population and housing is based on a review of existing policies, documents, and studies that address these services. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.14.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 3:** A community of distinct and livable places.

- **Policy LU 3.3.** Concentrate development along Slauson Avenue to establish activity centers that promote pedestrian activity, reduce automobile travel, and contribute to the reduction of greenhouse gases.
- **Policy LU 3.6.** Facilitate the creation of more mixed-use development that integrates housing with commercial uses to increase the customer base for local businesses and enhances economic activity and vitality.

**Goal LU 4:** A diversity of land uses providing for community needs.

- **Policy LU 4.2.** Accommodate the development of a wide variety of housing options for residents and workers that are affordable to households of varying income levels.
- **Policy LU 4.7.** Work with West Los Angeles College to explore opportunities to facilitate the provision of student and/or employee housing within the campus and to improve access to the campus from neighboring communities once the Inglewood Oil Field transitions to new uses.

**Goal LU 5:** Quality residential neighborhoods that are great places to live.

- **Policy LU 5.4.** Utilize incentives to encourage the production of affordable housing, consistent with the Economic Development Element and Countywide Housing Element.

**Goal LU 6:** Vital and active commercial and mixed-use districts serving residents and visitors to the community.

- **Policy LU 6.1.** Create incentives such as waivers of fees and development standards to attract private investment to revitalize and improve underutilized properties along Slauson Avenue and actively promote their use by commercial property owners and developers.

- **Policy LU 6.2.** Provide flexibility in permitted land uses and enable adaptability and re-use of existing buildings to allow changes responding to evolving markets and preventing vacancies.

- **Policy LU 6.3.** Encourage the redevelopment of existing multi-tenant commercial projects as mixed-use community-oriented centers, increasing the number of residents in proximity to retail and commercial uses, enhancing their economic vitality.

**Implementation Program LUI 2.** Assess the feasibility of developing student housing on campus and/or adjoining properties at West Los Angeles College.

### Economic Development Element

**Goal ED 3:** Equitable access for residents to good jobs in growing industries.

- **Policy ED 3.1.** Collaborate with the private sector to identify growing workforce needs and link training initiatives to the needs of target industries, consistent with General Plan Policy ED 5.11.

- **Policy ED 3.2.** Play a leadership role in convening and coordinating the activities of key regional workforce development system stakeholders, including the six other Workforce Investment Boards that operate in Los Angeles County, community colleges, businesses, K-12 institutions, philanthropic partners, and others, consistent with General Plan Policy ED 5.13.

**Goal ED 5:** Vibrant commercial areas that support small businesses.

- **Policy ED 5.2.** Prioritize spaces for small business in new development.

**Implementation Program EDI 3**. Study the feasibility of establishing a Center of Excellence (COE) for Health Care and Social Assistance and Professional, Scientific, and Technical industries in the Westside Area Plan. COEs are intended to focus on designated industry clusters or priority populations to form sector partnerships, convene industry leaders, lead countywide business development, and connect residents to jobs in targeted industries. Their creation is a modernization strategy for the County's America's Job Center of California (AJCC) system.

**Implementation Program EDI 8.** Offer zoning relief or financial incentives for developers to lease a certain percentage of leasable square feet to local legacy small businesses in new development. Reductions in required

parking or relief from other zoning standards (e.g., open space requirements) could be used in return for a certain percentage of square feet leased to the local legacy small businesses. Financial incentives could be in the form of property or sales tax abatement.

### 5.14.3.1 IMPACT ANALYSIS

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.14-1: Would the Project induce substantial 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)? [Threshold P-1]**

**Less Than Significant Impact.** There are no specific development projects that are identified or included as part of the WSAP. However, implementation of the WSAP would result in higher density residential and mixed-use zones within the identified 12 Opportunity Sites[2] shown in Figure 3-5, *Opportunity Sites Map*, in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. These proposed changes in land use and zoning would allow for future construction of additional residential units and therefore result in population growth. Table 5.14-3, *Proposed Growth within the WSAP,* shows the planned growth in households, population, and employment for these areas. The 6,757 residential dwelling units does exceed what was identified for the 2021-2029 Housing Element, which is 4,972 units within the Planning Area. However, this proposed growth is within unincorporated county RHNA allocations of 89,232 residential unit. The additional residential dwelling units in the Planning Area make approximately 2.0 percent[3] of the countywide RHNA allocation.

**Table 5.14-3 Proposed Growth within the WSAP**

| | Households[1] | Population | Employment |
|---|---|---|---|
| Ladera Heights, View Park, and Windsor Hills | 6,286 | 15,211 | 610 |
| West Fox Hills | 203 | 493 | 0 |
| Unincorporated Islands | 0 | 0 | 0 |
| Marina del Rey and Ballona Wetlands | 0 | 0 | 0 |
| **Westside Area Plan Totals** | **6,489** | **15,704** | **610** |

[1] Numbers based on the unincorporated Los Angeles County occupancy rate of 96%

The WSAP would encourage development by implementing land use, zoning, and policies that support efficient development while maintaining the unique character of the Planning Area. By targeting the location of housing and therefore, population growth within Planning Area communities, the WSAP addresses the growth targets assigned by the Housing Element to ensure that not only the Planning Area communities have capacity for this

[2] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the Baldwin Hills Community Standards District, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

[3] [(6,757 units – 4,972 units)/89,232 units] x 100 = 2.0%

growth, but to include policies, zoning, and related development regulations in place to minimize growth at unplanned levels and in unplanned locations.

The growth and increases in density that are proposed in the WSAP are guided by SCAG's Connect SoCal and the General Plan and Housing Element. The WSAP would place growth near planned or existing transit stations and areas, commercial retail service areas, and active transportation corridors. WSAP policies LU 3.3 and LU 6.3 promote development near proximity to existing retail and commercial uses. While the WSAP would result in increases in density and development intensity that could result in population growth, this growth would not be unplanned and would be consistent with existing regional planning assumptions regarding population growth. Impacts of unplanned population or housing growth in areas not targeted for growth or at unanticipated levels would be less than significant.

**Impact 5.14-2: Would the Project displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere? [Threshold P-2]**

**Less Than Significant Impact.** Providing a greater diversity of housing stock for communities within the Planning Area, as described in the WSAP, is key to creating affordable housing options for existing and future residents and reducing the potential for displacement. The WSAP would target community-serving growth near planned or existing transit stations, commercial retail service areas, high-quality transit areas, and active transportation corridors. As supported by WSAP policies LU 3.3 and LU 6.3, which promote development near proximity to existing retail and commercial uses, and further through policies LU 4.2 and LU 5.4, which support affordable housing and consistency with the Housing Element. The WSAP is tailored to meet the needs of the Planning Area community consistent with goals and policies of the County General Plan. While the WSAP would not directly displace people or existing housing, it contains zoning and policy updates that propose increases in density which are likely to result in the construction of new housing.

The proposed Project would provide land use designations for a variety of housing types and provide additional residential opportunities throughout Planning Area. The proposed Project would accommodate new housing units compared to existing conditions and would exceed the Countywide RHNA goal for the Planning Area. Therefore, impacts to the displacement of people and/or housing would be less than significant as a result of the proposed Project implementation.

## 5.14.4 Cumulative Impacts

**Impact 5.14-3: Would the Project, when combined with other past, present, or reasonably foreseeable projects, induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less Than Significant Impact**. Other projects in or near the Planning Area that have been approved in the past or will be approved in the reasonably foreseeable future include housing development projects that when combined (such as the proposed "View" project), have the potential to directly or indirectly induce substantial population growth or result in displacements. These projects, similar to the WSAP, would be subject to CEQA

and would be required to comply with planning documents such as the General Plan, general plans prepared by nearby cities, and regional plans such as the WSAP, SCAG's Regional Comprehensive Plan, and the SCAG RTP/SCS. These plans have been prepared to be consistent with each other. Projects would be approved if they meet the goals and policies of these planning documents in addition to the countywide Housing Element and RHNA, which have been prepared to reduce environmental impacts, including induced, unplanned growth. The WSAP in combination with other cumulative growth in the County would contribute to a less than significant cumulative population increase.

**Impact 5.14-4: Would the Project, when combined with other past, present, or reasonably foreseeable projects, displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?**

**Less Than Significant Impact.** When combined with other past, present, or reasonably foreseeable projects, the WSAP policies together with the County's recent housing initiatives related to inclusionary housing and interim and supportive housing, will minimize the potential for exclusionary displacement and displacement pressures. The WSAP contains policies and enacts zoning changes that will offer additional housing unit type options and ensure communities retain their character, amenities, and access to services and infrastructure. The WSAP would not result in the direct displacement of Planning Area residents or housing. Potential displacement impacts associated with all proposed development projects in the Planning Area will be analyzed and, if required, mitigated in accordance with CEQA. Projects would be approved if they meet the goals and policies of the WSAP, SCAG's Regional Comprehensive Plan, and the SCAG RTP/SCS, which have been prepared to reduce environmental impacts, including housing and population displacement. The WSAP in combination with other cumulative growth in the County would contribute to a less than significant cumulative housing displacement. No mitigation is required.

## 5.14.5 Level of Significance Before Mitigation

After compliance with County ordinances, development standards, and WSAP goals and policies, impacts related to population and housing would be less than significant.

## 5.14.6 Mitigation Measures

No mitigation measures are required.

## 5.14.7 Level of Significance After Mitigation

No significant impacts have been identified requiring mitigation and no significant and unavoidable impacts would occur.

## 5.14.8 References

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# 5. Environmental Analysis
## POPULATION AND HOUSING

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# 5.15 PUBLIC SERVICES

This section identifies and evaluates issues related to public services to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) would result in a significant impact related to public services providing fire protection and emergency services, police protection, and school services. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period.

## 5.15.1 Fire Protection and Emergency Services

### 5.15.1.1 ENVIRONMENTAL SETTING

#### Regulatory Background

##### *Federal Laws, Regulations, and Policies*

###### *National Fire Protection Association*

The National Fire Protection Association recommends that fire departments respond to fire calls within 6 minutes of receiving the request for assistance 90 percent of the time. These time recommendations are based on the demands created by a structural fire. It is crucial to attempt to arrive and intervene at a fire scene prior to the fire spreading beyond the room of origin. Total structural destruction typically starts within 8 to 10 minutes after ignition. Response time is generally defined as 1 minute to receive and dispatch the call, 1 minute to prepare to respond to the fire station or field, and 4 minutes (or less) travel time.

##### *State Laws, Regulations, and Policies*

###### *California Building Code*

The State of California provides a minimum standard for building design through the 2022 California Building Code (CBC), which is Part 2 of Title 24 of the California Code of Regulations (CCR). The 2022 CBC is a fully integrated code based on the 2021 International Building Code. It is generally adopted jurisdiction by jurisdiction, subject to further modification based on local conditions. Commercial and residential building plans are 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.

#### *California Fire Code*

The CFC incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in 24 CCR Part 9, and like the CBC, is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The County of Los Angeles (County) regularly adopts each new CFC update under County Code of Ordinances Title 32, Fire Code. The CFC is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all 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 wildfire hazard areas.

#### *California Emergency Services Act*

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the US Environmental Protection Agency, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

#### *California Health and Safety Code (Section 13000 et seq.)*

California Health and Safety Code (Section 13000 et seq.) State fire regulations are in Section 13000 et seq. of the California Health and Safety Code, which includes regulations concerning building standards (also in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions.

### *Local Laws, Regulations, and Policies*

#### *Los Angeles County Operational Area Emergency Response Plan*

Adopted in 2012, the County Operational Area Emergency Response Plan identifies how the emergency response plan aligns with other local, state, and federal authorities. The Plan identifies various emergency management phases, incident management systems, and operational priorities.

#### *2021 Los Angeles County Fire Strategic Plan*

The Los Angeles County Fire Department (LACFD) is one of six contract counties that have executed a contract with the State of California to provide wildland fire protection in State Responsibility Areas. As a contract county, LACFD implements the State Strategic Fire Plan, functionally operates as a unit of the

California Department of Forestry and Fire Protection, and is responsible for Strategic Fire Plan activities in the county. The 2021 LACFD Strategic Plan includes three goals: emergency operations, public service, and organizational effectiveness. The 2021 LACFD Strategic Plan includes goals related to analyzing the threat of wildfire to communities in the wildland-urban interface, fuel reduction projects, developing battalion-specific asset maps, strategies and tactics, and identifying fire prevention strategies that are consistent with the County's land use planning strategies. LACFD also has goals to support local Fire Safe Councils and to work with communities to develop Community Wildfire Protection Plans (LACFD 2021).

### *Los Angeles County General Plan*

The Los Angeles County General Plan (General Plan) guides policy for land use across unincorporated County. The following provides a summary of the most applicable goals and policies across applicable General Plan Elements that pertain to the Project but is not a comprehensive list.

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the Project (County of Los Angeles 2022a):

**Goal S 4:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property due to fire hazards.

- **Policy S 4.9.** Adopt by reference the County of Los Angeles Fire Department Strategic Fire Plan, as amended.
- **Policy S 4.12.** Support efforts to incorporate systematic fire protection improvements for open space, including the facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression.

**Goal S 7:** Effective County emergency response management capabilities.

- **Policy S 7.1.** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- **Policy S 7.2.** Support County emergency providers in reaching their response time goals.
- **Policy S 7.3.** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.
- **Policy S 7.4.** Encourage the improvement of hazard prediction and early warning capabilities.
- **Policy S 7.5.** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- **Policy S 7.6.** Ensure that essential public facilities are maintained during natural disasters, such as flooding, wildfires, extreme temperature and precipitation events, drought, and power outages.

- **Policy S 7.8.** Adopt by reference the County of Los Angeles All-Hazards Mitigation Plan, as amended.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Project (County of Los Angeles 2015):

**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.
- **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 1.3.** Ensure coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 1.4.** Ensure the adequate maintenance of infrastructure.
- **Policy PS/F 1.5.** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- **Policy PS/F 1.6.** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- **Policy PS/F 1.7.** Consider resource preservation in the planning of public facilities.

*Developers Fee for the Consolidated Fire Protection District of Los Angeles County*

To provide adequate fire protection services, the County has implemented a developers fee program as part of LACFD to help fund new facilities, equipment, and staffing shortages created by new development in the County (LA County 2022a). The developers' fees are paid directly to the Fire Protection District of Los Angeles and support the expansion of services as the county grows. The Fire District Developers Fee is charged to all residential development, commercial development, and additions over 2,000 square feet (LA County 2022a).

## Existing Conditions

The Westside Area Plan includes seven unincorporated communities: Ladera Heights, View Park, and Windsor Hills, Marina del Rey, Ballona Wetlands, and Westside Islands (West Los Angeles (LA)/Sawtelle Veterans Affair (VA)), West Fox Hills, Franklin Canyon, Gilmore Island. Marina del Rey, Ballona Wetlands, and West LA/Sawtelle VA) are governed by separate planning processes and are not anticipated to change. The two communities being primarily analyzed are Ladera Heights, View Park, and Windsor Hills and West Fox Hills.

LACFD services the unincorporated areas of County. Four stations provide fire and emergency medical services to the unincorporated cities in the Westside Planning Area (LACFD 2023).

- **Station 110** 4433 Admiralty Way, Marina Del Rey CA 90292
- **Station 58** 5757 S. Fairfax Avenue Los Angeles, CA 90056
- **Station 38** 3907 W. 54th Street, Los Angeles, CA 90043
- **Station 7** 847 N. San Vicente Blvd West Hollywood, CA 90069

### 5.15.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

### 5.15.1.3 ENVIRONMENTAL IMPACTS

#### Methodology

Evaluation of impacts related to fire protection and emergency services is based on a review of existing policies, documents, and studies that address these services in the County. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

#### Proposed Project Characteristics and Relevant WSAP Goals and Policies

The WSAP does not include any new policies or goals related to fire protection services. The Public Facilities and Services Element focuses primarily of providing public safety throughout the Planning Area. Additionally, the WSAP is intended to support the General Plan, which includes goals and policies to support fire protection services.

#### Impact Analysis

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.15-1: Would the project introduce new structures and residents into the LACFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel? [Threshold FP-1]**

**Less Than Significant Impact.** The WSAP is proposing amendments to various land use and zoning designations that would increase allowed development densities, as summarized in Table 3-1 of Chapter 3, *Project Description*. Changes to land use designations and zoning as a result of the WSAP would generally be

located within the urban environment and have access to existing public service infrastructure. Changes to the land use designation and zoning of the WSAP is primarily in Ladera Heights, View Park, and Windsor Hills and West Fox Hills.

The implementation of the proposed Project could require additional staffing at the fire stations within the Plan Area to continue delivering adequate levels of service to existing and new residents and businesses. In the event that service demands begin to exceed the service capacity of the existing stations and their current and proposed staffing, the LACFD would consider adding additional companies to the response system.

However, the County has regulations and policies in place that will enable the LACFD to expand its fire protection and emergency services capacity as new development occurs. The majority of the funds for facilities, equipment, and service personnel comes from the Fire District Developers Fee that is charged to all residential development, commercial development, and additions over 2,000 square feet. The developers' fees are paid directly to the Fire Protection District of Los Angeles and support the expansion of services as the county grows.

Future residential development projects within the Planning Area could increase the overall population and may require the construction or expansion of fire facilities. At the planning level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts associated with the construction of future fire facilities since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demands from buildout of the proposed project, the appropriate level of analysis required under CEQA would be conducted by the LACFD.

Additionally, there are several General Plan goals and policies that ensure adequate fire protection and emergency services are in place prior to new development. Policy PS/F 1.2 of the Public Services and Facilities Element requires that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms. Policy S 3.12 of the Safety Element supports efforts to incorporate systematic fire protection improvements for open space, including facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression. Policy S 4.5 requires that there are adequate resources, such as sheriff and fire services, for emergency response. The above policies would limit the impact of new developments on fire protection and emergency services. Approval of the WSAP would not alter the above policies and regulations or create additional goals, policies, and regulations that would impact fire protection and emergency services; therefore, impacts would be less than significant.

### 5.15.1.4 CUMULATIVE IMPACTS

**Impact 5.15-2: Would the Project, when combined with other past, present, or reasonably foreseeable projects, introduce new structures and residents into the LACFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel?**

**Less Than Significant Impact.** Fire protection services within the County frequently provide services over multiple jurisdictional boundaries. The culmination of past, present, and foreseeable future project would result in the need for additional fire protection services. Cumulative residential, industrial and commercial projects

would depend on existing and expanded fire protection services within the county. As analyzed in the Impact 5.15-1, the proposed Project would require the incorporation of the County Developers Fee Program. The County Developers Fee Program would fund the purchase and construction of new fire stations to provide adequate services as a result of new development, if determined necessary. The culmination of past, present, and foreseeable future residential development projects within the WSAP planning area could increase the countywide population and require the construction or expansion of fire facilities. Future expansion or new fire facilities would undergo the requisite environmental review to ensure physical impacts to the environment are adequately addressed and mitigated. At the planning level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts associated with the specific construction of future fire facilities since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demands from buildout of the proposed project, the appropriate level of analysis required under CEQA would be conducted by the LACFD. Since the WSAP would not induce regional population growth beyond the County's Housing Element projections, the demand for public services would be consistent with regional demand projections and would not increase the cumulative demand compared to current projections. As a result, the WSAP's contribution to cumulative demands for public services would not be considerable. No mitigation is required.

#### 5.15.1.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

After compliance with County ordinances, development standards, and WSAP goals and policies, impacts related to fire protection and emergency services would be less than significant.

#### 5.15.1.6 MITIGATION MEASURES

No significant adverse impacts related to fire protection and emergency services were identified and no mitigation measures are required.

#### 5.15.1.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts relating to fire protection and emergency services have been identified.

## 5.15.2 Police Protection

#### 5.15.2.1 ENVIRONMENTAL SETTING

### Regulatory Background

*Local Laws, Regulations, and Policies*

*Los Angeles County Operational Area Emergency Response Plan*

Adopted in 2012, the County Operational Area Emergency Response Plan identifies how the emergency response plan aligns with other local, state, and federal authorities. The plan identifies various emergency management phases, incident management systems, and identifies operational priorities.

### *Los Angeles County General Plan*

The Los Angeles County General Plan (General Plan) guides policy for land use across unincorporated Los Angeles County. The following provides a summary of the most applicable goals and policies across applicable General Plan Elements that pertain to the Project but is not a comprehensive list.

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the Project (County of Los Angeles 2022a):

**Goal S 7:** Effective County emergency response management capabilities.

- **Policy S 7.1.** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- **Policy S 7.2.** Support County emergency providers in reaching their response time goals.
- **Policy S 7.3.** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.
- **Policy S 7.5.** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Project (County of Los Angeles 2015):

**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.
- **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 1.3.** Ensure coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 1.5.** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- **Policy PS/F 1.6.** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- **Policy PS/F 1.7.** Consider resource preservation in the planning of public facilities.

*Developers Fee for Los Angeles County*

In order to provide adequate fire protection services, the County has implemented a Developers Fee Program to help fund new facilities, equipment and staffing shortages created by new development in the county (LA County 2022a).

### Existing Conditions

The WSAP includes seven unincorporated communities: Ladera Heights, View Park, and Windsor Hills, Marina del Rey, Ballona Wetlands, and Westside Islands (West Los Angeles [Sawtelle VA]), West Fox Hills, Franklin Canyon, Gilmore Island. Marina del Rey, Ballona Wetlands, and West Los Angeles (Sawtelle VA) are governed by separate planning processes and are not anticipated to change. The two communities being primarily analyzed are Ladera Heights, View Park, and Windsor Hills and West Fox Hills.

The Los Angeles County Sheriff's Department (LASD) is the largest Sheriff's department in the world and serves approximately 10 million people over 4,084 square miles (LASD 2023). The LASD provides services to 42 cities and 141 unincorporated communities, with approximately 18,000 employees (LASD 2022). In addition to enforcement of criminal laws, LASD also provides investigative, traffic enforcement, accident investigation, and community education functions.

The Marina del Rey Sheriff's Station services the areas of Marina del Rey, Santa Monica Bay, Ladera Heights, View Park, and Windsor Hills (LASD 2023).

## 5.15.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

## 5.15.2.3 ENVIRONMENTAL IMPACTS

### Methodology

Evaluation of impacts related to police protection services is based on a review of existing policies, documents, and studies that address these services in the county. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

## Proposed Project Characteristics and Relevant WSAP Goals and Policies

The WSAP does not include any new policies or goals specifically related to police protection services. However, the Public Facilities and Services Element focuses primarily of providing public safety throughout the Planning Area. Additionally, the WSAP is intended to support the Countywide General Plan, which includes goals and polices to support police protection services.

## Impact Analysis

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.15-3: Would the project introduce new structures and residents into the LASD service boundaries, thereby increasing the requirement for police protection facilities and personnel? [Threshold PP-1]**

**Less Than Significant Impact.** The LASD provides law enforcement services to the Planning Area. According to the Los Angeles County General Plan EIR, in order to provide sufficient services to its service area, an officer to population ratio of one officer for every 1,000 residents is desired. The LASD employs approximately 18,000 people, of whom 10,000 are sworn deputies. Based on the officer to population ratio, 10,000 officers would sufficiently serve 10,000,000 people.

While the WSAP is a policy document, proposed changes to land use and zoning designation could increase population densities in certain areas. The WSAP would not build new housing that results in direct population increases. Changes to land use designations and zoning as a result of the WSAP would generally be located within the urban environment and have access to existing public service infrastructure. Changes to the land use designation and zoning of the WSAP are primarily in Ladera Heights, View Park, and Windsor Hills and West Fox Hills. However, the WSAP would create higher density residential areas, which would increase the demand for law enforcement services necessitating the expansion of department facilities. At the planning level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts associated with the construction of future sheriff facilities since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demands from buildout of the proposed Project, the appropriate level of analysis required under CEQA would be conducted by the LASD.

The majority of the funds for facilities, equipment, and service personnel come from the various types of tax revenue. As new development occurs, tax revenue will increase. Tax revenue would then be allocated to maintain sufficient amenities such as staff and equipment. Funding from property taxes, as a result of population growth, would be expected to grow roughly proportional to any increase in residential units, businesses, and/or industrial/manufacturing in the Planning Area. The additional demand for fire services and protection generated within the city would be satisfied through property taxes.

Additionally, goals and policies outlined in the General Plan will ensure that the officer to resident ratio is maintained. Policy S 4.5 of the Safety Element will ensure that there are adequate resources, such as sheriff and fire services, for emergency response. Policy PS/F 1.1 of the Public Services and Facilities Element discourages development in areas without adequate public services and facilities. Approval of the WSAP would not alter

the above policies and regulations or create additional goals, policies, and regulations that would impact law enforcement services; therefore, impacts would be less than significant.

### 5.15.2.4 CUMULATIVE IMPACTS

**Impact 5.15-4: Would the Project, when combined with other past, present, or reasonably foreseeable projects, introduce new structures and residents into the LASD service boundaries, thereby increasing the requirement for police protection facilities and personnel?**

**Less Than Significant Impact**. The culmination of past, present and foreseeable future project would result in the need for additional law enforcement services. Cumulative residential, industrial, and commercial projects would depend on existing police enforcement services in the county. While most cumulative projects would be required to comply with CEQA and other independently enforceable county documents prior to their approval, they would necessitate the need for expanded police enforcement services. However, as analyzed in Impact 5.15-3, future development facilitated by the proposed Project would cause a potential significant impact that could be avoided/reduced to less than significant with Policy PS/F 1.1 and Policy S 4.5. Additionally, the LASD receives funding through tax revenue such as property tax, sales tax and deed transfer fees which are used to expand law enforcement facilities and operations necessitated by new development. As discussed in Section 5.14, *Population and Housing,* since the WSAP would not induce regional population growth beyond the County's Housing Element projections, the demand for public services would be consistent with regional demand projections and would not increase the cumulative demand compared to current projections. As a result, the WSAP's contribution to cumulative demands for public services would not be considerable. No mitigation is required.

### 5.15.2.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

After compliance with County ordinances, development standards, and WSAP goals and policies, impacts related to police protection would be less than significant.

### 5.15.2.6 MITIGATION MEASURES

No significant adverse impacts related to police protection were identified and no mitigation measures are required.

### 5.15.2.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts relating to police protection have been identified.

## 5.15.3 School Services

### 5.15.3.1 ENVIRONMENTAL SETTING

#### Regulatory Background

##### *State Laws, Regulations, and Policies*

###### *California Government Code*

**Section 65995.** California Government Code Section 65995 (the Leroy F. Green School Facilities Act of 1998) set provisions for school districts to levy fees to help fund expanded facilities to house new pupils that may be generated by development projects. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under the California Environmental Quality Act (CEQA). These fees may be adjusted by the district over time as conditions change.

**Section 66000.** According to California Government Code 66000, a qualified agency, such as a local school district, may impose fees on developers to compensate for the impact that a project will have on existing facilities or services. The State of California legislature passed Senate Bill (SB) 50 in 1998, which inserted new language into the Government Code (Sections 65995.5–65995.7) to authorize school districts to impose fees on developers of new residential construction in excess of mitigation fees authorized by Government Code 66000. School districts must meet a list of specific criteria, including the completion and annual update of a School Facility Needs Analysis, in order to be legally able to impose the additional fees.

#### Local Laws, Regulations, and Policies

##### *Los Angeles County Code*

Title 4 Chapter 4.52 of the Code of Ordinances is known as the interim school facilities financing ordinance of Los Angeles County (LA County 2022c). This ordinance allows for school districts to notify the Board of Supervisors (Board) that conditions of overcrowding exist. Once the Board confirms these conditions do exist, the Department of Public Works and the Department of Regional Planning are notified and must stop issuing permits within the geographic boundary of the affected area. The school district must create a detailed analysis of how these issues can be resolved by means of fees or use of land. Developers of a proposed residential development will be subject to pay a fee in accordance with provisions of Section 4.52.120 or make land available in accordance with provisions of Section 4.52.130. The fees or land made available must be use for interim classrooms and facilities. (County of Los Angeles 2022c)

##### *Los Angeles County General Plan*

The General Plan guides policy for land use across unincorporated County. The following provides a summary of the most applicable goals and policies across applicable General Plan elements that pertain to the Project but is not a comprehensive list.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Project (LA County 2015).

**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.
- **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 1.3.** Ensure coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 1.4.** Ensure the adequate maintenance of infrastructure.
- **Policy PS/F 1.5.** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- **Policy PS/F 1.6.** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- **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.
- **Policy PS/F 7.2.** Proactively work with school facilities and education providers to coordinate land use and facilities planning.
- **Policy PS/F 7.3.** Encourage adequate facilities for early care and education.

## Existing Conditions

The WSAP includes seven unincorporated communities: Ladera Heights, View Park, and Windsor Hills, Marina del Rey, Ballona Wetlands, and Westside Islands (West Los Angeles [Sawtelle VA]), West Fox Hills, Franklin Canyon, Gilmore Island. Marina del Rey, Ballona Wetlands, and West Los Angeles (Sawtelle VA) are governed by separate planning processes and are not anticipated to change. The two communities being primarily analyzed are Ladera Heights, View Park, and Windsor Hills and West Fox Hills.

The County's role in developing and managing educational facilities and programs is limited. However, the Los Angeles County Office of Education (COE) serves as an intermediary between the local school districts and the California Department of Education. The COE is guided by a seven-member board of education, whose members are appointed by the County Board of Supervisors. The COE provides a vision statement and strategic opportunities for educational facility development to coordinate the assessment of facility needs and the construction of schools that fall to individual school districts. The County also coordinates public school

facilities through subdivision approval processes, in which developers are required to assess the need for, and in some cases provide, land for the construction of public schools to support their project. Development impact fees based on the size of a development are distributed to the appropriate school district for the construction of school facilities before the County issues any building permits.

There are five school districts that serve the Planning Area boundaries: Inglewood Unified School District, Los Angeles Unified School District, Culver City Unified School District, Santa Monica-Malibu Unified School District, and Beverly Hills Unified School District. Education uses encompass 85.4 acres or approximately 3 percent of the Planning Area and consist of several elementary and middle schools and West Los Angeles College, which is a public community college of approximately 70 acres at the westernmost boundary of the community, adjacent to Culver City and the Inglewood Oil Field. Other schools are in established residential neighborhoods. Two schools are in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities: Windsor Hill Math Science and Fifty-Fourth Street Elementary School.

### 5.15.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

SS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school services.

### 5.15.3.3 ENVIRONMENTAL IMPACTS

#### Methodology

Evaluation of impacts related to school facilities is based on a review of existing policies, documents, and studies that address these services in the County. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.15.3.4 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

The WSAP does not include any new policies or goals related to school services. The Public Facilities and Services Element focuses primarily of providing public safety throughout the Planning Area. Additionally, the WSAP is intended to support the General Plan, which includes goals and polices to support fire school services.

#### Impact Analysis

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.15-5: Would the project generate new students who would impact the school enrollment capacities of area schools? [Threshold SS-1]**

**Less Than Significant Impact.** Implementation of the WSAP would result in the development of additional dwelling units and an increase in population, thereby resulting in an increase in student population in the Planning Area, specifically in relation to the 12 Opportunity Sites[1] identified in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. If and when any districts in the Planning Area need to expand or construct new facilities to accommodate the growth generated by buildout of the WSAP, funding for new schools would be obtained from the fee program pursuant to SB 50 and state and federal funding programs. Pursuant to Section 65996 of the Government Code, payment of school fees is deemed to provide full and complete school facilities mitigation. At this planning level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts associated with the construction of future school facilities since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demands from buildout of the proposed project, the appropriate level of analysis required under CEQA would be conducted by the respective district. Therefore, buildout of the proposed WSAP would result in a less-than-significant impact related to schools.

### 5.15.3.5 CUMULATIVE IMPACTS

**Impact 5.15-6: Would the Project, when combined with other past, present, or reasonably foreseeable projects, generate new students who would impact the school enrollment capacities of area schools?**

**Less Than Significant Impact.** The culmination of past, present and foreseeable future residential development projects within the WSAP planning area could increase the student population and require the construction or expansion of school facilities. While most cumulative projects would be required to comply with CEQA and other independently enforceable county documents prior to their approval, they would necessitate the need for the construction or expansion of existing school services. However, as analyzed in Impact 5.15-5, future development facilitated by the proposed Project would cause a potential significant impact that could be avoided/reduced to less than significant with the school impact fees established by SB 50. Developers would be required to pay a school impact fee in concurrence with building permit approval. The legislature has found SB 50 to qualify as "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, SB 50 would adequately reduce any cumulative impacts of school services. Since the WSAP would not induce regional population growth beyond the County's Housing Element projections, the demand for schools would be consistent with regional demand projections and would not increase the cumulative demand compared to current projections. As a result, the WSAP's contribution to cumulative demands for schools would not be considerable. No mitigation is required.

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

#### 5.15.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

After compliance with the County Code, development standards, and WSAP goals and policies, impacts related to school services would be less than significant.

#### 5.15.3.7 MITIGATION MEASURES

No significant adverse impacts related to school services were identified and no mitigation measures are required.

#### 5.15.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts relating to school services have been identified.

## 5.15.4 Library Services

### 5.15.4.1 ENVIRONMENTAL SETTING

#### Regulatory Background

##### *State Laws, Regulations, and Policies*

###### *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.

##### *Local Laws, Regulations, and Policies*

###### *Los Angeles County Title 22 Planning and Zoning Codes: Mitigation Fees*

New residential development in the unincorporated areas of the County is subject to a library mitigation fee. The fee is intended to supplement facilities needs and mitigating the impact that new residential development will have on the library system. The Library Facility Mitigation Fee differs across the seven library planning areas. The Planning Area is in library planning areas 4 and 5, which have fees of $1,094 and $1,097 per dwelling unit, respectively (LA County 2024a).

###### *Los Angeles County General Plan*

The Los Angeles County General Plan (General Plan) guides policy for land use across unincorporated County. The following provides a summary of the most applicable goals and policies across applicable General Plan elements that pertain to the Project but is not a comprehensive list.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Project (LA County 2015).

**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.
- **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 1.3.** Ensure coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 1.4.** Ensure the adequate maintenance of infrastructure.
- **Policy PS/F 1.5.** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- **Policy PS/F 1.6.** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- **Policy PS/F 1.7.** Consider resource preservation in the planning of public facilities.

**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.
- **Policy PS/F 8.2.** Support library mitigation fees that adequately address the impacts of new development.

## Existing Conditions

The County of Los Angeles (County) has one of the largest public library systems in the country. The library system is a special-fund County department that operates under the supervision of the board of supervisors. The County Library system serves over 3.4 million residents over 3,000 square miles. The service area includes 49 of the 88 incorporated cities and all unincorporated areas of the county (Los Angeles 2024b) The County Library system has 86 libraries and a 7.5 million volume book collection. The network also offers an expansive online database, newspapers, magazines, and government publications. (DRP 2015; Los Angeles 2024b) The majority of the 86 libraries do not meet the standards needed to properly serve the county. The current guidelines require minimum facility space of 0.5 square feet per capita. Additional service level planning guidelines require an inventory of 2.75 items per capita (DRP 2015). A study that was conducted by the library in 2001 found that by 2020, 89 percent of existing facilities will not be large enough to meet the guidelines for facility space, and 77 percent will not have enough inventory to meet the standard of 2.75 items per capita (DRP 2015). In efforts to keep up with population increases and new developments impact on the library system, the County implemented a library mitigation fee that applies to new residential development in the unincorporated areas.

The WSAP includes seven unincorporated communities: Ladera Heights, View Park, and Windsor Hills, Marina del Rey, Ballona Wetlands, and Westside Islands (West Los Angeles [Sawtelle VA]), West Fox Hills, Franklin Canyon, Gilmore Island. Marina del Rey, Ballona Wetlands, and West Los Angeles (Sawtelle VA) are governed by separate planning processes and are not anticipated to change. The two communities being primarily analyzed are Ladera Heights, View Park, and Windsor Hills and West Fox Hills. The View Park Bebe Moore Campbell Library serves the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities.

### 5.15.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services.

### 5.15.4.3 ENVIRONMENTAL IMPACTS

#### Methodology

Evaluation of impacts related to library facilities is based on a review of existing policies, documents, and studies that address these services in the County. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.15.4.4 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Facilities and Services Element

**Goal PF 2:** Public services and facilities that support the social, physical, and mental health of residents.

- **Policy PF 2.4.** Achieve equal access to high quality library services for all residents at the View Park Bebe Moore Campbell Library. Explore options to provide library services for homebound older adults.

**Goal PF 4:** Community members are informed about and able to take advantage of services and facilities provided by the County and local partners.

- **Policy PF 4.1.** On a regular basis, participate in local events such as those held at Ladera Park, Monteith Park, and View Park Bebe Moore Campbell Library to connect and communicate with residents on the county's public services and facilities and encourage residents to participate in them.

**Implementation Program PFI 3.** Periodically hold pop-ups at local events to meet with community members to listen to any concerns or input they may have and to promote the County's public services and facilities.

### Impact Analysis

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.15-7: Would the project generate new residents who would impact the library capabilities of the Planning Area? [Threshold LS-1]**

**Less Than Significant Impact.** The WSAP would result in increases in density and development intensity, which could result in population growth, but this growth would not be unplanned and would be consistent with existing regional planning assumptions. However, demand for library services may increase as a result.

While the WSAP itself would not create additional housing, rezoning would allow for new housing development with increased local population densities, specifically in relation to the 12 Opportunity Sites identified in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. At the planning level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts associated with the construction of future library facilities since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demands from buildout of the proposed project, the appropriate level of analysis required under CEQA would be conducted by the County.

The County's library mitigation fee program requires residential development projects to pay a fee that is intended to supplement facility needs and mitigate the impact that new residential development would have on the library system. The Library Facility Mitigation Fee differs across the seven library planning areas. The Project is in library planning area 4 and 5, which have fees of $1,094 and $1,097 per dwelling unit, respectively (LA County 2024a). This fee will mitigate the burden of new development on existing library services and help maintain the guidelines for facility space of 0.5 gross square feet per capita and 2.75 items per capita. Additionally, Goal 8 from the Public Services and Facilities element of the County General Plan will ensure that there is a comprehensive public library system. Policy PS/F 8.2 supports the library mitigation fee to adequately address the impacts of new development. Policy PS/F 8.1 ensures a desired level of library services through coordinated land use and facilities planning. The goals and policies in the General Plan along with the library mitigation fee would ensure that impacts to the library system resulting from increased densities in targeted areas would be less than significant.

## 5.15.4.5 CUMULATIVE IMPACTS

**Impact 5.15-8: Would the Project, when combined with other past, present, or reasonably foreseeable projects, generate new residents who would impact the library capabilities of the County?**

**Less Than Significant Impact.** The County Library Department serves the unincorporated County and surrounding areas. The culmination of past, present, and foreseeable future residential development projects would increase the demand for library services. While most cumulative projects would be required to comply with CEQA and other independently enforceable county documents prior to their approval, they would

necessitate the need for the construction or expansion of existing library facilities and services. However, as analyzed in Impact 5.15-7, the proposed Project would cause a potential significant impact that could be avoided/reduced to less than significant with the incorporation of the library facilities mitigation fee. Present and future projects would be required to pay a fee to reduce the impacts that new development will have on the library system by funding the expansion of library facilities. Since the WSAP would not induce regional population growth beyond the County's Housing Element projections, the demand for libraries would be consistent with regional demand projections and would not increase the cumulative demand compared to current projections. The library facilities fee would mitigate cumulative impacts on the County Library system. As a result, the WSAP's contribution to cumulative demands for libraries would not be considerable. No mitigation is required.

### 5.15.4.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

After compliance with County ordinances, development standards, and WSAP goals and policies, impacts related to library services would be less than significant.

### 5.15.4.7 MITIGATION MEASURES

No significant adverse impacts related to library services were identified and no mitigation measures are required.

### 5.15.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts relating to library services have been identified.

## 5.15.5 References

Los Angeles County. 2022. Interim School Facilities Financing. Title 4, Chapter 4.52 of Los Angeles County Code of Ordinances. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TI T4REFI_CH4.52INSCFAFI.

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# 5.16 RECREATION

This section identifies and evaluates issues related to parks and recreational facilities to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in significant impacts. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period. Issues relating to parks and recreational facilities raised in comments are addressed in this section.

## 5.16.1 Environmental Setting

### 5.16.1.1 REGULATORY BACKGROUND

#### State Laws, Regulations, and Policies

##### *California Government Code*

The Quimby Act (Government Code Section 66477), enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of the funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

##### *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.

##### *State Public Park Preservation Act*

The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act. Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

##### *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, and to levy assessments for the construction,

installation, and maintenance of certain public landscaping and lighting improvements. Landscaping and Lighting Districts may be established to maintain local public parks.

## Local Laws, Regulations, and Policies

### *Los Angeles County Code (Quimby Requirements)*

The Los Angeles County Code (County Code) contains regulations governing operation of park facilities, and regulations for 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) provides the methodology to determine the amount of parkland required to be dedicated by the subdivider as a part of the subdivision map approval process. Section 21.28.140 also states the developer may also choose to pay a fee in lieu of the provision of parkland or may choose to provide less than the required amount of parkland but provide amenities equal to the value of what the in-lieu fee would be. As a condition of zone change approvals, General Plan amendments, specific plan approvals, or development agreements, the County of Los Angeles (County) may require a subdivider to dedicate land according to the General Plan goal of four acres of local parkland per 1,000 residents, and six acres of regional parkland per 1,000 residents. Once the local park space obligation is determined, County Code Section 21.24.350, Residential Subdivisions, Provision or Local Park Sites, contains 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, Park Fees Required When, Computation and Use. It is the County Department of Parks and Recreation's (LADPR) responsibility to develop a schedule specifying how, when, and where it will use the parkland and/or fees, from each subdivision to develop park or recreational facilities within the applicable park planning area.

### *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, 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 Countywide Parks and Recreation Needs Assessment (also referred to as the "Parks Needs Assessment") and was approved in November 2016 with nearly 75 percent of voters supporting it. Generating more than $90 million per year for the local parks, beaches, and open space areas in the County, 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 Park Design Guidelines and Standards*

The County Park Design Guidelines and Standards are intended to guide County staff, design professionals, and other agencies on how to design and develop parks that meet County standards and expectations. The manual offers input from LADPR 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.

### *County Trails Manual*

The County Trails Manual (Trails Manual) provides guidance to County departments that interface with trail planning, design, development and maintenance of hiking, equestrian, and mountain biking trails. The Trails Manual was adopted by the County Board of Supervisors (Board) on May 17, 2011, and was revised in June 2013. The Trails Manual provides guidelines for implementation of multi-use trails within the unincorporated communities of the County and recognizes the existence of the broader regional trail network in the County and surrounding counties that provides access to recreational resources operated by federal, State, and local agencies. The Trails Manual sets the guidelines for reviewing plans and specifications for trails that are provided in conjunction with land use planning and the entitlement process for projects proposed for development within the County. Proposed developments are reviewed for consistency with the Trails Manual. The goal of the Trails Manual is to establish well-defined trail types, guidelines, and priorities to facilitate the development of high-quality trails that benefit the public.

### *Los Angeles Countywide Parks and Recreation Needs Assessments*

#### *2016 Los Angeles Countywide Parks and Recreation Needs Assessment*

Adopted by the Board on July 5, 2016, the Parks Needs Assessment (PNA) was a historic and significant undertaking to engage all communities in Los Angeles County, including those within the Westside Planning Area (Planning Area), in a collaborative process to gather data and input for future decision-making on parks and recreation. The primary goal of the PNA was to quantify the magnitude of need for parks and recreational facilities and determine the potential costs of meeting that need. This goal was accomplished in the final report, which 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 PNA:

- 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.

According to the LADPR Interactive Map Viewer and based on the Geographic Information System (GIS) data from the 2016 PNA, the Planning Area has park needs that range between very low to very high. The Ladera Heights, View Park, Windsor Hills—except for small pocket developed with the Frank D Elementary School[1]—and Franklin Canyon areas have a very low park need. The Marina del Rey, Ballona Wetlands, and West Fox Hills areas have a moderate park need. The Gilmore Island area has a moderate park need. The West LA/Sawtelle VA has a very high park need (LADRP 2024).

### *2022 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment Plus*

On December 6, 2022, the Los Angeles County Board of Supervisors adopted the 2022 Parks Needs Assessment Plus (PNA+). The PNA+ is a national model for park equity and planning that assesses the County's needs with respect to environmental conservation and restoration, regional recreation, and rural recreation. The PNA+ builds on the Los Angeles Countywide Parks and Recreation Needs Assessment (PNA) of 2016, which comprehensively analyzes and quantifies the need for parks and recreational facilities in cities and unincorporated areas. It identifies priority areas for environmental conservation and restoration, forming the basis of the County's strategy to conserve at least 30 percent of lands and waters by 2030 (30x30). It also identifies priority areas for regional recreation and rural recreation using various indicators of population vulnerability and other factors such as access to regional and rural recreation sites via different modes of travel, the availability of such facilities, and the amenities they offer. The goals of the PNA+ are to:

- Ensure that everyone has access to our beaches and lakes, open spaces and natural areas, regional parks, trails, and parks and recreational facilities in rural areas, regardless of race, social class, gender, disability status, or other characteristics.

- Collect data and provide analysis that will inform planning and decision-making to ensure that park resources are distributed more equitably and that all communities will be able to enjoy the full range of benefits offered by parks and recreational facilities.

- Create opportunities for meaningful dialogues and connections among people from diverse backgrounds and cultures.

- Develop an inclusive, accessible, and transparent process for public engagement and decision-making.

Specifically, Appendix A of the PNA+ identifies the park and recreation, and environmental conservation and restoration needs in the Westside Regional Study Area corresponding to the boundaries of the Westside Planning Area. Several communities within the Westside Regional Study Area were identified as having Very High Park Need based on the 2016 Countywide Park Needs Assessment. These study areas include Hollywood – South Palms – Mar Vista – Del Rey, Venice, West Adams, West Hollywood and Westwood/Unincorporated Sawtelle VA Center.

[1] This area of the Ladera Heights, View Park, and Windsor Hills community has a very high park need based on the 2016 PNA data.

The PNA+ recommends LADPR and its partners, including other park agencies, community based organizations, funders, and volunteers identify funding priorities; provide park, trail, and open space; facilitate collaboration and coordination; increase access and information; facilitate community engagement; and increase capacity building.

The PNA+ identifies restoration priorities which form the basis for a 30x30 strategy for Los Angeles County, which entails the conservation of 30 percent of lands in the County by 2030. Restoration is specifically speaking to the restoration of areas with high environmental burdens as identified in PNA+. These areas have the most environmental burdens with respect to groundwater threat, hazardous waste, poor air and water quality and pollution burden. Examples include oil fields (such as Inglewood Oil Field in Baldwin Hills within the Westside Planning Area), brownfields, landfills (such as Puente Hills), and other degraded lands which may be converted to park and open space in the future.

### *Los Angeles County General Plan*

The Los Angeles County General Plan (General Plan) Parks and Recreation Element guides policy for the maintenance and expansion of the 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 Land Use Element of the General Plan provides the following goals and policies potentially relevant to the Project:

**Goal LU 5:** Vibrant, livable and healthy communities with a mix of land uses, services and amenities.

- **Policy LU 5.7.** Direct resources to areas that lack amenities, such as transit, clean air, grocery stores, bikeways, parks, and other components of a healthy community.

The Parks and Recreation Element of the General Plan provides the following goals and policies potentially relevant to the Project:

**Goal P/R 1:** Enhanced active and passive park and recreation opportunities for all users.

- **Policy P/R 1.2.** Provide additional active and passive recreation opportunities based on a community's setting, and recreational needs and preferences.
- **Policy P/R 1.3.** Consider emerging trends in parks and recreation when planning for new parks and recreation programs.
- **Policy P/R 1.4.** Promote efficiency by building on existing recreation programs.
- **Policy P/R 1.5.** Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.

- **Policy P/R 1.6.** Improve existing parks with needed amenities and address deficiencies identified through the park facility inventories.
- **Policy P/R 1.7.** Ensure adequate staffing, funding, and other resources to maintain satisfactory service levels at all County parks and recreational facilities.
- **Policy P/R 1.8.** Enhance existing parks to offer balanced passive and active recreation opportunities through more efficient use of space and the addition of new amenities.

**Goal P/R 2:** Enhanced multi-agency collaboration to leverage resources.

- **Policy P/R 2.1.** Develop joint-use agreements with other public agencies to expand recreation services.
- **Policy P/R 2.2.** Establish new revenue generating mechanisms to leverage County resources to enhance existing recreational facilities and programs.
- **Policy P/R 2.3.** Build multiagency collaborations with schools, libraries, nonprofit, private, and other public organizations to leverage capital and operational resources.
- **Policy P/R 2.4.** Utilize school and library facilities for County sponsored and community sponsored recreational programs and activities.
- **Policy P/R 2.5.** Support the development of multi-benefit parks and open spaces through collaborative efforts among entities such as cities, the County, State, and federal agencies, private groups, schools, private landowners, and other organizations.
- **Policy P/R 2.6.** Participate in joint powers authorities (JPAs) to develop multi-benefit parks as well as regional recreational facilities.

**Goal P/R 3:** Acquisition and development of additional parkland.

- **Policy P/R 3.1.** Acquire and develop local and regional parkland to meet the following County goals. four acres of local parkland per 1,000 residents in the unincorporated areas and six acres of regional parkland per 1,000 residents of the total population of the County.
- **Policy P/R 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 obligations.
- **Policy P/R 3.3.** Provide additional parks in communities with insufficient local parkland as identified through the gap analysis.
- **Policy P/R 3.4.** Expand the supply of regional parks by acquiring land that would. 1) provide a buffer from potential threats that would diminish the quality of the recreational experience; 2) protect watersheds; and 3) offer linkages that enhance wildlife movements and biodiversity.

- **Policy P/R 3.5.** Collaborate with other public, nonprofit, and private organizations to acquire land for parks.

- **Policy P/R 3.6.** Pursue a variety of opportunities to secure property for parks and recreational facilities, including purchase, grant funding, private donation, easements, surplus public lands for park use, and dedication of private land as part of the development review process.

- **Policy P/R 3.9.** The Department of Parks and Recreation does not accept undeveloped park sites from developers. Developers are required to provide a developed park to the County on a "turn-key" basis and receive credit for the costs of developing the public park up to and against any remaining Quimby obligation, after accounting for the net acreage dedicated to the County.

**Goal P/R 4:** Improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages.

- **Policy P/R 4.1.** Create multi-use trails to accommodate all users.

- **Policy P/R 4.3.** Develop a network of feeder trails into regional trails.

- **Policy P/R 4.5.** Collaborate with other public, nonprofit, and private organizations in the development of a comprehensive trail system.

- **Policy P/R 4.6.** Create new multi-use trails that link community destinations including parks, schools and libraries.

**Goal P/R 5:** Protection of historical and natural resources on County park properties.

- **Policy P/R 5.1.** Preserve historic resources on County park properties, including buildings, collections, landscapes, bridges, and other physical features.

- **Policy P/R 5.3.** Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.

- **Policy P/R 5.4.** Ensure maintenance, repair, rehabilitation, restoration, or reconstruction of historical resources in County parks and recreational facilities are carried out in a manner consistent with the most current Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

**Goal P/R 6:** A sustainable parks and recreation system.

- **Policy P/R 6.3.** Prolong the life of existing buildings and facilities on County park properties through preventative maintenance programs and procedures.

- **Policy P/R 6.5.** Ensure the routine maintenance and operations of County parks and recreational facilities to optimize water and energy conservation.

### 5.16.1.2 EXISTING CONDITIONS

The Planning Area is on the western side of the County bordering the Pacific Ocean. The western side of the Planning Area consists of a string of beaches and Marina del Rey. The Planning Area contains one of the few remaining wetlands in Ballona Creek. The eastern portion of the Planning Area includes Baldwin Hills (including the Inglewood Oil Field) and Kenneth Hahn State Recreation Area, which provide natural areas and recreational opportunities for residents. The County operates and maintains parks and recreational facilities in both unincorporated areas and cities in the County. The system includes local and regional parks, natural areas, special use facilities, and multi-use trails (DRP 2016, 2022a, 2022b). These facilities serve the local needs of communities in the unincorporated areas and regional needs countywide. According to Appendix A of the PNA+, the Westside Planning Area has approximately 25,271 acres of regional facilities and provides 26 acres of regional facility land per 1,000 residents (LADPR 2022). The County as a whole provides a total of 998,301 acres of regional parkland and provides 99 acres of regional facility land per 1,000 county residents (LADPR 2022)..

According to the Southern California Association of Governments' population projections, the County has a population of 10,283,330 (including incorporated and unincorporated areas) (refer to Table 5.14-1, *Population and Housing Estimates and Projections*). With a total of 608 acres of local parkland and a population of 1,057,192 in the unincorporated areas of the County, the County as a whole provides a ratio of 0.57 acre[2] of parkland per 1,000 people, which is below the County's goal of four acres of local parkland per 1,000 residents.

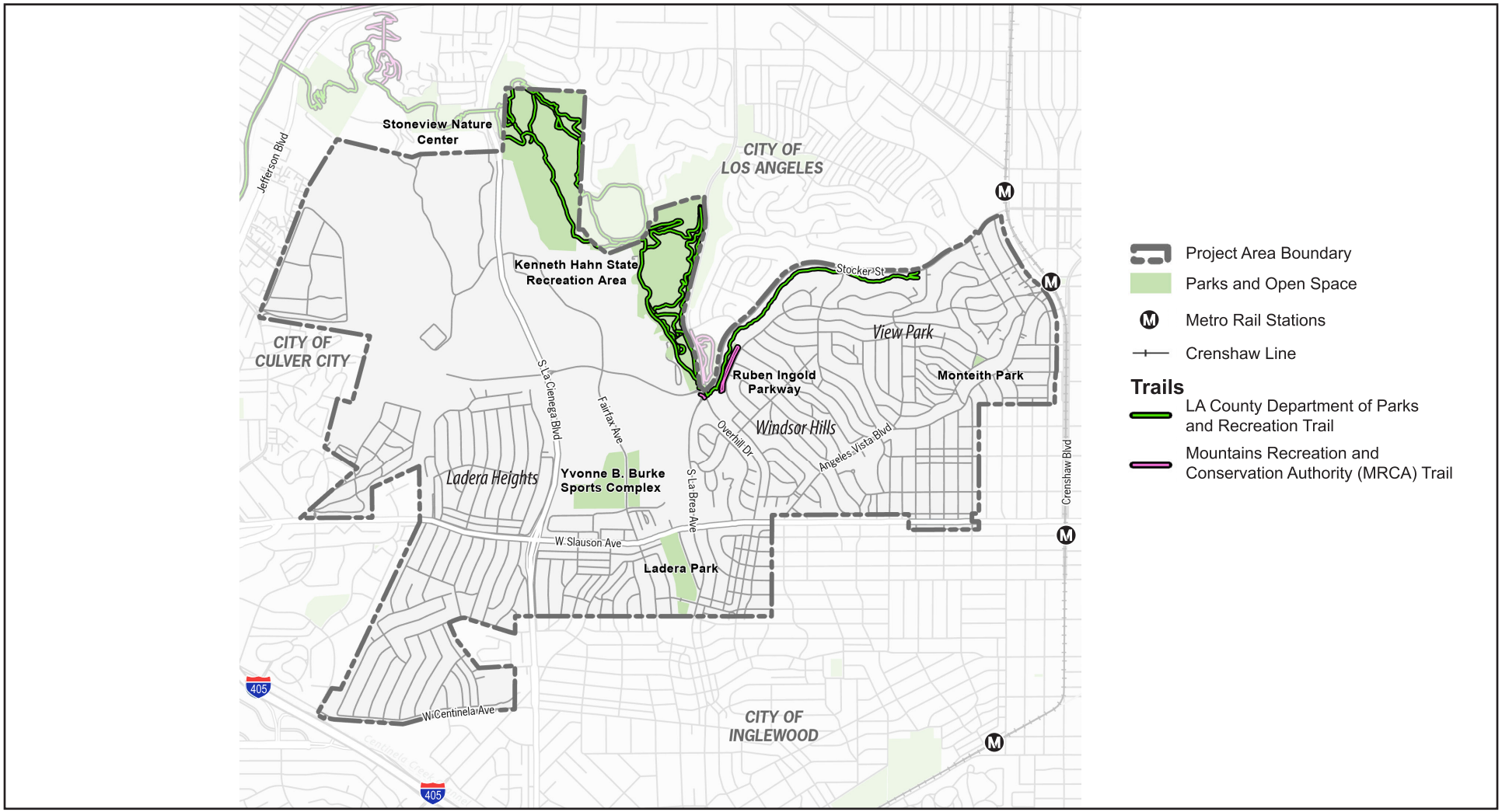
**Ladera Heights, View Park, and Windsor Hills.** Ladera Heights, View Park, and Windsor Hills were analyzed in the 2016 PNA and determined that these areas have a low park need. Ladera Heights, View Park, and Windsor Hills contain 557.1 acres of land designated for open space and recreation. Figure 5.16-1, *Ladera Heights, View Park, and Windsor Hills: Parks, Open Space, and Trails*, identifies the parks and open space areas within the community. One of the more notable open spaces and recreational facilities in the area is Kenneth Hahn State Recreation Area, managed by LADPR (DRP 2023). This facility occupies approximately 338 acres and includes large areas of native coastal sage scrub habitat, lawns and landscaped areas, picnic sites, tot lots, fishing lake, lotus pond, community center, and five miles of trails (DRP 2015). Passive recreation includes 8 picnic rental shelters and 100 picnic tables throughout the park. There are also 8 large barbecue pits and 60 small ones dispersed throughout the park (CDPR 2024). As identified in Figure 5.16-1, smaller parks in the community include Monteith Park, Ladera Park, Rueben Ingold Parkway, and the Yvonne B. Burke Sports complex. A description of each park is provided below (LADPR 2024a).

- **Monteith Park** is an approximately 0.6-acre triangular shaped park with picnic tables, park benches, and play area for the residents of the View Park community.

- **Ladera Park** is an approximately 16.0-acre park with basketball courts, children's play area, community center, picnic tables, tennis courts, barbecues, amphitheaters, fitness par courses, group picnic shelters, picnic shelters, and softball and baseball/t-ball fields.

[2] (608 acres/1,057,192 people) x (1,000 people/1) = 0.57 acres

## Figure 5.16-1 - Ladera Heights, View Park, and Windsor Hills: Parks, Open Space, and Trails




*Source: County of Los Angeles; PlaceWorks.*

# 5. Environmental Analysis
## RECREATION

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- **Rueben Ingold Parkway** is an approximately 0.2-mile walkway that provides a fitness par course.
- **Yvonne B. Burke Sports Complex** is a sports park that provides three baseball fields and two soccer fields.

Additionally, Stocker Corridor Trail runs parallel to Stocker Street on the northern boundary of the View Park and Windsor Hills community. It is the easternmost segment of the Park to Playa Trail, which is a 13-mile regional trail that connects the Baldwin Hills Parklands to the Pacific Ocean. The Kenneth Hahn State Recreation Area also contains trails that connect to the Park to Playa Trail. Other segments of the Park to Playa Trail include Blair Hills, Baldwin Hills Scenic Overlook, Culver City Park, and Ballona Creek Bike Path. (DRP 2023). The Ballona Creek Bike Path is a County-maintained Class I bike path in the Planning Area that parallels Ballona Creek, connecting to Marina del Rey and the Pacific Ocean (LADPR 2024b).

**Marina del Rey and Ballona Wetlands.** Aubrey E. Austin Jr. Park, Burton W. Chace Park, and North Jetty are in Marina del Rey. There is a paved walkway that goes out to the ocean at the end of the north jetty. Beachgoers can walk along the jetty to reach the Marina peninsula and access an overlook for the Marina lagoon, both of which are accessible by stroller and wheelchair. There is also a bike path along Ballona Creek that connects West Fox Hills to Marina del Rey.

**Franklin Canyon and Gilmore Island.** Franklin Canyon is managed by the Mountains Recreation and Conservation Authority and is mostly used as parkland and trails. Franklin Canyon is part of the Franklin Canyon Park, approximately 605 acres, and there are no residents in unincorporated Franklin Canyon. Gilmore Island is currently developed and occupied by a parking lot in the CBS Studio Complex and does not contain recreational facilities.

## 5.16.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County practice, a project would normally have a significant effect on the environment if the project:

R-1 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.

R-2 Includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

R-3 Interfere with regional trail connectivity.

## 5.16.3 Environmental Impacts

### 5.16.3.1 METHODOLOGY

The County uses a goal of four acres of local parkland per 1,000 residents, as established in the Parks and Recreation Element of the General Plan, above the Quimby Act standard that requires a minimum of three

acres of parkland per 1,000 residents. Local parkland includes active, passive, special use, neighborhood, and community parks, but does not include regional parks, open space, National Forest land, or regional trails.

## Key Concepts/Terminology

Parks, recreation, and open space resources in the County range from vibrant community and regional parks to natural areas, trails, and open spaces. Active and passive recreation facilities are available at the parks, including but not limited to athletic fields, playgrounds, picnic areas, water activities, camping, horseback riding, fishing lakes, and multiuse trails for hiking, biking, and horseback riding. These facilities also offer many sports, special interests, and educational classes.

For the purposes of this analysis, parks are identified as either local or regional, which are defined as follows:

- **Local Park.** Local park spaces typically provide facilities for active recreation and gathering that meet neighborhood needs, offer opportunities for daily recreation, and are highly utilized. Local parks have facilities such as picnic areas and playgrounds, and they can accommodate a variety of organized sports, including soccer, baseball, tennis, volleyball, basketball, and skateboarding.

- **Regional Park.** Regional recreation parks are over 100 acres and of regional importance. These facilities contain active amenities such as athletic courts and fields, playgrounds, and swimming pools. They also offer opportunities for wildlife viewing, beautiful scenery, conservation, and outdoor recreation, including hiking, biking, and equestrian trails, that serve residents and visitors throughout the County. Other types of regional facilities besides parks in the Planning Area include trails, trailheads, staging areas, equestrian parks, natural areas, and golf courses.

Additionally, for purposes of this analysis, active and passive recreation facilities are defined as follows:

- **Active.** Active recreation includes organized play areas such as sports facilities for softball, baseball, football, and soccer fields; volleyball, tennis, and basketball courts, swimming pools, and/or forms of playground equipment.

- **Passive.** Passive recreation typically does not require organized play areas or sports facilities and such parks are often irregular in shape. Passive recreation often includes open space areas and trails; it also includes facilities for walking, picnicking, and water sports such as fishing or rowing.

School facilities may also provide land and facilities for recreational use on a limited basis through a joint-use agreement between the County and school districts. In general, public school recreational facilities are open to the public during non-school hours. Elementary schools may provide adjunct recreation opportunities to surrounding neighborhoods during non-school hours. Junior high schools and high schools may provide adjunct community-wide facilities for public use.

## Approach

The analysis of impacts to park and recreational facilities in this section is based on the current population for the unincorporated areas of the County and the County's total local parkland. Based on the current population

for the unincorporated areas of the County, approximately 4,229 acres[3] of local parkland would be required to meet the County's goal of four acres per 1,000 people. As described above, there is currently 608 acres of existing local parkland. Therefore, the County is deficient by approximately 3,620 acres of local parkland to meeting the County's goal for local parkland.

This analysis section evaluates the potential impacts of the proposed WSAP's policies on existing parks and recreational facilities within the County using the State CEQA Guidelines' thresholds of significance. While the WSAP is not responsible for providing local parkland in a manner that would satisfy the County's goals, this impact analysis evaluates if the proposed goals and policies would exacerbate the County's existing deficiency or result in significant environmental impacts as a result of use, construction, expansion, or interference with existing parks, open space, and recreational resources in the Planning Area.

### 5.16.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

The WSAP furthers the efforts to promote active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to foster economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to support sustainable mobility options in an enhanced built environment. Because the WSAP is planning for future growth in the Planning Area, no actual development is being proposed at this time. Goals and policies from the Land Use Element, Mobility Element, and Conservation and Open Space Element related to recreational resources are identified below.

#### Land Use Element

**Goal LU 4:** A diversity of land uses providing for community needs

- **Policy LU 4.6.** Provide for recreational activities and the inclusion of parklands and open spaces within the fabric of existing and future land uses.

**Goal LU 7:** A complete community with uses that support resident needs.

- **Policy LU 7.2.** Accommodate social, religious, cultural, and recreational facilities and programs that equitably meet the diverse needs of residents.

**Goal LU 13 (Wateridge Business Center):** Development of housing as infill on existing parking lots and long-term replacement of existing buildings and parking structures warranted by marketplace changes.

- **Policy LU 13.3.** Ensure that new buildings are landscaped and designed to complement adjacent recreational facilities and open spaces.

**Goal LU 22 (Inglewood Oil Field):** Redevelopment of the Inglewood Oil Field with Uses Contributing to the Quality of Life of Community Residents.

[3] (4 acres/1,000 people) x (1,057,192 people/1) = 4,229 acres

- **Policy LU 22.1.** Support the abatement of existing oil operations and redevelopment for uses that complement and are integrated with existing neighborhoods and districts.
- **Policy LU 22.3.** Enable the community to be actively involved in the determining and planning for uses to be developed as replacement of existing Oil Field operations.
- **Policy LU 22.4.** Provide for the linkage of new uses to the existing community with pedestrian and bicycle paths, greenways, and other elements.

### Mobility Element

**Goal M 4:** Pedestrian and bicycle infrastructure is safe, connected, and comfortable for users of all ages and abilities.

- **Policy M 4.4.** Continue to build out and expand the existing trail and bicycle network in the community, connecting to parks and recreational areas, neighborhood commercial corridors, and other community destinations.
- **Policy M 4.6.** Continue to promote the community's recreational values by enhancing landscape and trail management in Kenneth Hahn State Recreation Area.
- **Policy M 4.7.** Expand the existing trail network by building safer pedestrian crossing infrastructure and adding signage and wayfinding between parks. Improve pedestrian connections between existing sidewalk and trail infrastructure in the community with future uses on the site of the Inglewood Oil Field.

### Conservation and Open Space Element

**Goal COS 1:** The natural environment and natural resources are sustained for enjoyment and equitable use by future generations of Westside residents.

- **Policy COS 1.1.** Provide public access and educational resources equitably for residents at open spaces and natural areas that are habitats for sensitive species, wherever feasible and applicable, in accordance with the recommendations of PNA+.

**Goal COS 2:** Biological, natural and open space resources are protected, conserved, and enhanced.

- **Policy COS 2.2.** Preserve Kenneth Hahn State Recreation Area and surrounding open spaces as a valuable outdoor space for humans, animals, and plants alike.

**Goal COS 3:** The Inglewood Oil Field is transformed into a public and environmental asset.

- **Policy COS 3.2.** Ensure that future use of the Inglewood Oil Field is linked with adjoining recreational areas, trails, residential neighborhoods, and commercial/mixed-use districts for the enjoyment of County residents.

- **Policy COS 3.3.** When feasible, restore native species vegetation of the Inglewood Oil Field to provide new habitats for special status species (rare, threatened, or endangered) that may be found on-site

### Public Facilities and Services

**Goal PF 5:** Accessible and equitable parks and recreational facilities support the health and well-being of Westside residents.

- **Policy PF 5.1.** Remove barriers to accessibility as recommended in the PNA+. Examples of removing barriers includes improving ADA accessibility, shade, access to the facilities, safety, and recreational programming and active and passive recreational opportunities that support individuals with different physical, mental, developmental, and age-related needs.

- **Policy PF 5.2.** Enhance pedestrian, bicycle, and multi-modal access to local and regional parks such as the Kenneth Hahn State Recreation Area, Ladera Park, and Monteith Park through new transportation infrastructure, trails, and signage.

- **Policy PF 5.3.** Explore opportunities for new or enhanced facilities such as swimming pools, community and recreation centers, community gardens, and sports parks.

- **Policy PF 5.4.** Achieve adequate trailhead access, additional linkages, signage, and other facilities at the Park and Playa Trail.

**Implementation Program PFI 4.** Conduct a study to explore opportunities identified in the PNA+ to improve access and accessibility to existing parks and recreation facilities in the Westside and for new or enhanced facilities and programs. Seek resources to implement study recommendations..

## 5.16.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.16-1: 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? [Threshold R-1]**

**Less Than Significant Impact.** The WSAP is a long-range policy document that would allow an increase in residential density and mixed-use areas in the communities of Ladera Heights, View Park, Windsor Hills, and West Fox Hills. The WSAP would not result in direct population increases through the development of housing or provision of jobs. However, indirect population growth would be anticipated in the areas proposed for increased residential density based on the proposed land use and zoning changes (see Figure 3-5, *Opportunity Sites*). Increases in population in areas that currently do not have adequate recreational facilities would have the potential to accelerate deterioration of existing facilities from intensified overuse.

Currently, the County does not meet the goal of four acres of local parkland per 1,000 residents; there is a 3,620-acre deficit of local parkland. Additionally, population in the Planning Area would increase by 15,704 people through implementation of the WSAP. Although there is an existing local parkland deficiency, there are other recreational facilities that reduce the demand for local park facilities, such as regional parkland (namely, Kenneth Hahn State Recreation Area), school facilities, beaches, trails, and open space. Furthermore, implementing the County's General Plan goals for increasing parklands and focusing on increasing parkland in the areas identified as having a high need for parks—per the LADPR 2016 PNA and 2022 PNA+—would help address the parkland deficit. The General Plan includes several policies related to the development of multi-benefit parks and open spaces through collaborative efforts among entities such as cities, the County, State and federal agencies, private groups, school, private landowners, and other organizations (General Plan Policy P/R/ 2.5); development network of feeder trails into regional trails (General Plan Policy P/R 4.3); and collaboration with other public, non-profit, and private organizations in the development of a comprehensive trail system (General Plan Policy P/R 4.5). Policies of the WSAP also aim to provide recreational activities and parklands and open space within existing and future land uses (WASP Policy LU 4.6); accommodate recreational facilities that meet the needs of residents (WSAP Policy LU 7.2); explore opportunities for new or enhanced recreational facilities (WSAP Policy PF 5.3), and ensure that future changes in the Inglewood Oil Field contribute to the quality of life of WSAP residents (WSAP Policies LU 22.1, 22.3, and 22.4). Implementation of these policies would reduce the demand and potential for physical deterioration on local parks by providing other options for parks and recreational facilities throughout the Planning Area.

Given the existing deficiency of local parkland, future development within the Planning Area would not in and of itself result in a significant physical deterioration of recreational facilities. As identified in the 2016 PNA (General Plan Policy P/R 3.3), the County would provide additional parks in communities with insufficient local parkland. This would further ensure that specific needs of the communities within the Planning Area are met to reduce impacts to park facilities in communities with existing deficiencies. Therefore, future increases in parkland acreage would be proportional in size and location to the increases in population resulting from the WSAP.

Future development within the Planning Area facilitated by land use and zoning changes in the WSAP may result in direct population growth by the provision of residences or indirect growth by the provision of employment. Future projects in the Planning Area would be required to undergo individual project-level analysis under CEQA and would be required to provide dedication of adequate parkland or pay an in-lieu park and recreation facilities impact fee as a condition of approval for compliance with the Quimby Act. Moreover, implementation of policies in the Los Angeles County 2035 General Plan; the recommendations in the 2016 PNA and the 2022 PNA+, and the proposed WSAP focus on increasing parkland for residents (WSAP Goal COS 3, Goal PF 1), which would help address the parkland deficit in areas of high park needs.

Although the collection of required Quimby in-lieu fees would mitigate some of the overburden on the recreation system, it is not expected to be enough to meet the established goal of four acres of local parkland per 1,000 residents, with the existing deficiencies. However, the County would ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible (WSAP Goal PF 5, WSAP Policy COS 2.2, WSAP LU 13.3, General Plan Policy P/R 1.5) and would work to improve existing parks with needed amenities

and address deficiencies identified through the park facility inventories (General Plan Policy P/R 1.6). These policies would further reduce impacts related to deterioration of existing parks and recreational facilities.

As detailed in the County's Housing Element (HEU), as the County plans for more housing in urban areas with existing park deficits, the County will support equitable access to parks for new and current residents and reduce racial disparities for communities of color, particularly in Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) communities (DRP 2022). The West Los Angeles/Sawtelle VA Center is identified as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP) community. Through the HEU, Program 23, Park Access for New Residential Development, proposed a feasibility study to establish a new park impact fee for residential projects that are not subject to the County's Quimby parkland requirements in Title 21 (Subdivisions). The feasibility study will take into consideration existing park deficits and explore options to generate additional funding for parks in those areas determined to have a "Very High" or "High" level of park need per the 2016 PNA, which a particular emphasis on R/ECAP communities (DRP 2022). If a new park impact fee for multifamily residential rental project is found to be feasible, it is anticipated that the fees collected would contribute to enhanced or new park space to support these projects. Therefore, if this new park impact fee is found to be feasible, it is possible that this feasibility study could eventually lead to the creation or improvement of parks in the Westside Planning Area, since one of the communities within the Westside Area Plan is categorized as an R/ECAP community and most of the communities in the Westside Area Plan are determined to have a "High" or "Very High" level of park need per the 2016 PNA.

Adherence to the applicable regulatory framework, including the Quimby Act, Los Angeles County Code Section 21.24.350, and Housing Element Program 23 if adopted, would ensure that local parkland would be provided through funding or dedication proportional to future growth and development associated with the proposed Project. Furthermore, the presence and provision of parks, recreation, and open space facilities beyond local parks would serve to reduce the potential for substantial physical deterioration of recreational facilities. Therefore, implementation of the WSAP as a programmatic document directing future growth and development in the Planning Area 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. Impacts would be less than significant.

**Impact 5.16-2: Would the project include recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.[Threshold R-2]**

**Less Than Significant Impact.** As described above, indirect population growth would be anticipated within the areas proposed for increased residential density based on the proposed land use and zoning changes associated with the proposed Project, which would require construction or expansion of parks and recreational facilities, which have the potential to result in adverse physical effects on the environment.

The WSAP would support development that would be tailored to the goals and policies for the unincorporated Planning Area communities of Ladera Heights, View Park, Windsor Hills, and West Fox Hills. The WSAP includes goals and policies that would encourage additional recreation space, which could result in the construction or expansion of parks and recreational facilities (WSAP Goal PF 1, Goal PF 5, Policies PF 5.1.,

5.2, 5.3, Goal COS 3, Policies COS 3.2, 3.3). The expansion of existing recreational facilities or construction of new recreational facilities may result in construction impacts related to site demolition, grading, building development, and landscaping. However, is it speculative to determine what impacts may arise because the exact location and extent of these future projects is unknown. Additionally, as future projects are planned, their design would be redefined in accordance with the WSAP and Los Angeles County 2035 General Plan policies identified in Section 5.16.1.1.

Potential physical impacts on the environment related to future parks and recreational facilities projects would be analyzed and mitigated, if required, on a project-by-project basis in compliance with CEQA. State and local regulations would require project-level mitigation for potentially significant impacts to the environment that may result from the construction or expansion of parks and recreational facilities. Therefore, implementation of the WSAP as a programmatic document directing future growth and development within the Planning Area would not result in the construction or expansion of recreational facilities that may have the potential to result in adverse effects on the environment. Impacts would be less than significant, and no mitigation is required.

**Impact 5.16-3: Would the project interfere with regional trail connectivity?[Threshold R-3]**

**No Impact.** The land use changes associated with the proposed Project do not have the potential to result in future development that may interfere with regional trails because the proposed land uses are all on urban infill sites, away from regional trails such as the Stocker Corridor Trail. The WSAP includes goals and policies to improve connectivity within the Planning Area (WSAP Goal M 4, Goal COS 1, Policy COS 1.1 Policy COS 3.3, Goal PF 5). Specifically, one of the objectives of the WSAP is to enhance accessibility to trails and enhance connectivity between recreational facilities (WSAP Policy PF 5.2). Additionally, the County's General Plan also includes a policy to develop a network of feeder trails into regional trails (General Plan Policy P/R 4.3). The proposed Project is not anticipated to result in future growth that would interfere with existing or proposed regional trials. Furthermore, potential impacts from future discretionary projects related to regional trail connectivity would be analyzed and mitigated, if required, on a project-by-project basis in compliance with CEQA and/or NEPA. Therefore, implementation of the WSAP as a programmatic document directing future growth and development in the Planning Area would not result in interference with regional trail connectivity. No impact would occur and no mitigation is required.

## 5.16.4 Cumulative Impacts

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself). The cumulative geographic study area used to assess potential cumulative recreation-related impacts is Los Angeles County, inclusive of incorporated and unincorporated areas.

**Impact 5.16-4: Would the project, when combined with other past, present, or reasonably foreseeable projects, have a significant cumulative contribution to the increase the use of existing neighborhood and regional parks or other recreational facilities that substantial physical deterioration of the facility would occur or be accelerated?**

**Less Than Significant Impact.** As described above, the WSAP provides the planning framework to allow for an increase in residential density and mixed-use areas in the communities of Ladera Heights, View Park, and Windsor Hills, and West Fox Hills in the Planning Area., resulting in increased growth and subsequently increased use of existing local and regional parks and recreational facilities. This growth may result in accelerated deterioration of recreational facilities and may require the development of new parks and recreational facilities. Cumulative project that would affect parks and recreational facilities within the Planning Area include buildout of general plans for cities within the County. Growth and development in the County have the potential to increase the use of and demand for recreational facilities, which would have the potential to result in substantial physical deterioration of existing facilities. As previously discussed, while the Planning Area is deficient in local parkland, there are sufficient regional parklands and regional recreational facilities available Countywide as Los Angeles County, as a whole, currently exceeds the County standard of six acres of regional parkland per 1,000 residents (DRP 2014). Additionally, the WSAP includes several policies that would contribute additional parks and recreational facilities that would improve the local parkland ratio such a providing recreational activities and inclusion of parklands and open space within the fabric of existing and future land uses (WSAP Policy LU 4.6); accommodating recreational facilities and programs that meet the needs of residents (WSAP Policy LU 7.2); and ensuring that open space preservation, habitat restoration and the provision of new recreational activities be incorporated into plans for the future re-use of the Inglewood Oil Field (WSAP Policy COS 3.2) Deterioration that may occur to local parks and recreational facilities from regional population growth would be offset with funding from new development such as in-lieu fees for parks or donation of parkland pursuant to the Quimby Act and/or local park dedication ordinances as part of other jurisdiction's municipal codes.

Although much of the demand for parkland could be accommodated through regional parkland, a deficit of local parkland would remain in the region compared to the County's goal. Enforcement by the County and cities of existing local parkland dedication requirements would serve to reduce the potential for deterioration of facilities by allowing adequate funding for the provision and maintenance of recreational facilities. Therefore, adherence to existing regulations, General Plan policies, WSAP policies, and strategies and guidance from the 2016 PNA and 2022 PNA+ Final Reports would ensure that the funding for parkland acquisition and parkland development operation, and maintenance would be proportional to increase in population pursuant to regulatory code and Quimby Act. Impacts would be less than significant, and no mitigation is required.

**Impact 5.16-5: Would the project when combined with other past, present, or reasonably foreseeable projects, have a significant cumulative contribution to the need for construction or expansion of existing neighborhood and regional parks or other recreational facilities which might have an adverse impact on the environment?**

**Less Than Significant Impact.** It is speculative to determine the location of future parks and recreational facilities in the Planning Area and impacts that may arise from development of individual parks or recreational

facility projects. The majority of cumulative projects for the construction or expansion of these facilities would be discretionary and would be required to demonstrate compliance with CEQA prior to project approval; existing state, and local regulations, would mitigate potential adverse impacts to the environment that may result from the construction or expansion of parks and recreational facilities. Therefore, the WSAP would not result in a cumulatively considerable contribution to a significant cumulative impact associated with the construction or expansion of existing recreational facilities. Impacts would be less than significant, and no mitigation is required.

**Impact 5.16-6: Would the project when combined with other past, present, or reasonably foreseeable projects, have a significant cumulative contribution related to the inference with regional trail connectivity?**

**No Impact.** As previously discussed, the proposed Project would not result in individual development that would interfere with regional trial connectivity. Planned growth is targeted in the communities of Ladera Heights, View Park, Windsor Hills, and West Fox Hills. Additionally, one of the WSAP's goals is to enhance trail accessibility and enhance connectivity between recreational facilities. Therefore, interference with regional trail connectivity would conflict with one of the WSAP's goals. Therefore, as the WSAP is not anticipated to have a significant impact on regional trail connectivity, the proposed Project would not contribute to a cumulative impact on regional trail connectivity.

The WSAP would not result in a cumulatively considerable contribution related to the inference with regional trail connectivity. No impact would occur and no mitigation is required.

## 5.16.5 Level of Significance Before Mitigation

After implementation of regulatory requirements and standard conditions of approval, impacts would be less than significant.

## 5.16.6 Mitigation Measures

No mitigation measure required.

## 5.16.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to recreation have been identified.

## 5.16.8 References

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# 5. Environmental Analysis
## RECREATION

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# 5.17 TRANSPORTATION

This section evaluates the potential for implementation of the Westside Area Plan (proposed Project or WSAP) to result in transportation impacts in the Planning Area. This section describes the physical environmental and regulatory settings, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment. The analysis in this section is based in part on the following technical report:

- *Westside Area Plan Vehicle Miles Traveled Analysis*, Fehr and Peers, 2024 (see Appendix E to this Draft PEIR)

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A to this Draft PEIR). These comments identify various substantive concerns related to transportation. Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping period.

## 5.17.1 Environmental Setting

This section discusses the existing environmental setting relative to transportation. As described in Chapter 3, *Project Description*, the proposed Project is evaluated at a programmatic level and the analysis is based on information available to the County where reasonably foreseeable, direct, and indirect changes in the environment could be considered. As a result, this section describes generally the Planning Area and, where applicable, the general areas of future potential land use changes as part of implementing the WSAP because those are the areas that may result in changes to the environment that were not already considered in previous environmental analyses or studies.

### 5.17.1.1 REGULATORY BACKGROUND

#### State Laws, Regulations, and Policies

##### *Senate Bill 743*

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which was intended to streamline review under the CEQA process for several categories of development projects, including the development of infill projects in transit priority areas, and to 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 (GHG) emissions.

In addition, SB 743 revises the metric for determining impacts relative to transportation to vehicle miles traveled (VMT), replacing the use of level of service (LOS) in CEQA documents. Previously, transportation impacts under CEQA focused on the delay that vehicles experience at intersections and on roadway segments, utilizing a metric of LOS. Mitigation for vehicular delay often required increasing roadway capacity. Capacity enhancements have been proven to induce additional travel, generating additional GHG emissions. Capacity enhancements may also remove right-of-way available for pedestrian and bicycle facilities, and may generally

discourage alternative modes of transportation. The use of VMT as a transportation impact metric promotes the state's goals of reducing GHG emissions and traffic-related air pollution by promoting the development of a multimodal transportation system and providing clean, efficient access to destinations.

Pursuant to SB 743, the CEQA Guidelines were updated in December 2018 to add Section 15064.3, Determining the Significance of Transportation Impacts, which describes specific considerations for evaluating a project's transportation impacts using VMT methodology. Additionally, the Governor's Office of Planning and Research (OPR) released "Technical Advisory on Evaluating Transportation Impacts in CEQA" (2018) to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdictions. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance…recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (CEQA Guidelines Section 15064.7[c]).

### *Senate Bill 375*

The Sustainable Communities and Climate Protection Act of 2008 (SB 375) supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, the California Air Resources Board sets regional targets for GHG emissions reductions from passenger vehicle use.

Each of California's metropolitan planning organizations (MPO) must prepare a sustainable communities strategy (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. The California Air Resources Board must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets.

The Southern California Association of Governments (SCAG) adopted its updated RTP/SCS in April 2024 to address requirements of SB 375. This legislation is relevant to evaluation of the Project's transportation impacts because the Project includes strategies to reduce transportation-related GHG that may be complementary to or consistent with strategies in the RTP/SCS. SCAG's adopted RTP/SCS, Connect SoCal, is discussed below.

### *California Department of Transportation*

As the owner and operator of the state highway system, Caltrans implements established state planning priorities in all functional plans, programs, and activities. Caltrans coordinates and consults with local jurisdictions when proposed local land use planning and development may impact state highway facilities.

Caltrans's Transportation Impact Study Guide establishes VMT as Caltrans's primary review focus when evaluating local land use projects, replacing LOS as the metric used in CEQA transportation analyses (Caltrans 2020a). Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment in OPR's Technical Advisory (2018) for land use projects. In addition to VMT, the 2020

Transportation Impact Study Guide states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the state highway system and connections with the state highway system.

In addition, Caltrans issued "Transportation Analysis Framework: Evaluating Transportation Impacts of State Highway System Projects" (2020), which is one component of a set of materials prepared by Caltrans to guide the implementation of SB 743. The purpose of this document is to assist Caltrans district staff and others responsible for assessing likely transportation impacts as part of environmental review of proposed projects on the state highway system by providing guidance on the preferred approach for analyzing the VMT attributable to proposed transportation projects (induced travel) in various project settings.

### *Toward an Active California: State Bicycle + Pedestrian Plan*

Toward an Active California: State Bicycle + Pedestrian Plan (2017) is Caltrans's statewide plan for active modes of transportation, intended to complement local and regional active transportation plans across the state. This policy direction continues to support the recent trend of increasing bicycle and pedestrian travel in the state and strengthens the connection between transportation, environmental sustainability, and public health. This plan is an important element of a statewide goal to provide robust multimodal transportation.

### *Assembly Bill 1358*

Assembly Bill (AB) 1358, the Complete Streets Bill, amended Section 65302 of the California Government Code to require that all major revisions to a city or county's circulation element include provisions for accommodation of all roadway users, including bicyclists and pedestrians.

### *California Bicycle Transportation Act*

The California Bicycle Transportation Act (1994) requires all cities and counties to have an adopted bicycle master plan in order to apply for funding from the Bicycle Transportation Account.

## Local Laws, Regulations, and Policies

### *Connect SoCal*

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050

by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

### *Los Angeles County Metropolitan Transportation Authority 2020 Long Range Transportation Plan*

The Los Angeles County Metropolitan Transportation Authority (Metro) approved the 2020 Long Range Transportation Plan (LRTP) on September 24, 2020. The LRTP provides a 30-year financial blueprint for the projects and programs proposed and under implementation by Metro. The programs and policies outlined in the LRTP include:

- Complete the ExpressLanes Strategic Network
- Improve bus speeds
- Promote trip reduction strategies
- Explore implementation of pilot traffic reduction program
- Provide more affordable transit
- Expand first/last mile connectivity
- Support transit-oriented communities

### *Active Transportation Strategic Plan*

Metro adopted the Active Transportation Strategic Plan (ATSP) in 2016. The ATSP identifies how the agency plans to help cities encourage more walking and biking in the County. Metro's goal is to make it easier for people to walk and bike to transit stations as well as to help cities fund and build regional walk/bike paths that connect communities.

Metro is working to advance active transportation initiatives and provide more travel options throughout the county. Metro is currently updating the 2016 ATSP, which will further its mission of providing a world-class transportation system and focus specifically on improving the regional active transportation network and first/last mile connectivity to transit. Relevant initiatives, existing and proposed, from the County ATSP have been incorporated into the WSAP to further implement the ATSP and meet the WSAP goals of enhancing walkability and integrating land use and mobility throughout its communities. The goals and objectives of the ATSP include:

- Improve access to transit.
- Establish active transportation modes as integral elements of the countywide transportation system.
- Enhance safety, remove barriers to access, or correct unsafe conditions in areas of heavy traffic, high transit use, and dense bicycle and pedestrian activity.
- Promote multiple clean transportation options to reduce criteria pollutants & greenhouse gas emissions, and improve air quality.
- Improve public health through traffic safety, reduced exposure to pollutants, and design and infrastructure that encourage residents to use active transportation as a way to integrate physical activity.

### *NextGen Bus Plan*

The NextGen Bus Plan was approved by the Metro board of directors on October 22, 2020, and its implementation began in December 2020. The goal of NextGen is to create an attractive and competitive world-class bus system by focusing service in areas with the greatest travel demand, simplifying routes and schedules, and maximizing speed, reliability, and customer experience.

### *Measure M Traffic Improvement Plan*

Measure M was approved by Los Angeles County voters in 2016 and provides a half-cent sales tax measure to fund projects to ease traffic, repair local streets and sidewalks, expand public transportation, earthquake retrofit bridges and subsidize transit fares for students, seniors and persons with disabilities. Measure M partially funds many Metro projects, as well as making funding available to local jurisdictions via the Metro Subregional Program; Metro Active Transportation, Transit and First/Last Mile Program; and Local Return.

### *Los Angeles County Department of Public Works*

The Los Angeles County Department of Public Works adopted its Transportation Impact Analysis Guidelines on July 23, 2020. The Transportation Impact Analysis Guidelines include guidance and requirements for VMT analysis of development projects, including project screening, analysis methodology, significance criteria, impact assessment, and mitigation strategies. Significance criteria in the Transportation Impact Analysis Guidelines for land use projects are focused on a project's potential to increase VMT above thresholds that are tied to regional averages. For transportation projects, significance criteria only apply to projects that would increase capacity or otherwise induce additional travel on the roadway network.

### *General Plan*

The Mobility Element of the Los Angeles County General Plan provides goals and policies relevant to transportation and traffic, which include the following:

**Goal M 1:** Street designs that incorporate the needs of all users.

- **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 1.3.** Utilize industry standard rating systems to assess sustainability and effectiveness of street systems for all users.

**Goal M 2:** Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.

- **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. E**nsure 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.
  - 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 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.

**Goal M 3:** Streets that incorporate innovative designs.

- **Policy M 3.1.** Facilitate safe roadway designs that protect users, preserve state and federal funding, and provide reasonable protection from liability.
- **Policy M 3.2.** Consider innovative designs when part of an accepted standard, or when properly vetted through an appropriate engineering/design review, in compliance with all state and federal laws.
- **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.
- **Policy M 3.4. S**upport legislation that minimizes or eliminates liability associated with the implementation of innovative street designs that accommodate all users.

**Goal M 4:** An efficient multimodal transportation system that serves the needs of all residents.

- **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 4.6.** Support alternative LOS standards that account for a multimodal transportation system.
- **Policy M 4.7.** Maintain a minimum LOS D, where feasible; however, allow LOS below D on a case-by-case basis in order to further other General Plan goals and policies, such as those related to environmental protection, infill development, and active transportation.
- **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.
- **Policy M 4.14.** Coordinate with Caltrans on mobility and land use decisions that may affect state transportation facilities.
- **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.
- **Policy M 4.16.** Promote mobility management practices, including incentives to change transit behavior and using technologies, to reduce VMTs.

**Goal M 5:** Land use planning and transportation management that facilitates the use of transit.

- **Policy M 5.1.** Facilitate transit-oriented land uses and pedestrian-oriented design to encourage transit ridership.
- **Policy M 5.2.** Implement parking strategies that facilitate transit use and reduce automobile dependence.
- **Policy M 5.3.** Maintain transportation right-of-way corridors for future transportation uses, including bikeways, or new passenger rail or bus services.
- **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.
- **Policy M 5.5.** Encourage financing programs, such as congestion pricing, bonding, increasing parking costs, fair share programs for each community, to implement local and state transportation systems and facilities.

**Goal M 6:** The safe and efficient movement of goods.

- **Policy M 6.3.** Designate official truck routes to minimize the impacts of truck traffic on residential neighborhoods and other sensitive land uses.
- **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 6.5.** Support infrastructure improvements and the use of emerging technologies that facilitate the clearance, timely movement, and security of trade.
- **Policy M 6.6.** Preserve property for planned roadway and railroad rights-of-way, marine and air terminals, and other needed transportation facilities.

**Goal M 7:** Transportation networks that minimizes negative impacts to the environment and communities.

- **Policy M 7.1.** Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.
- **Policy M 7.2.** Encourage the creation of wildlife underpasses and overpasses, fencing, signage, and other measures to minimize impacts to wildlife at junctures where transit infrastructure passes through or across sensitive habitats.
- **Policy M 7.3.** Encourage the use of sustainable transportation facilities and infrastructure technologies, such as liquid and compressed natural gas, and hydrogen gas stations, ITS, and electric car plug-in ports.
- **Policy M 7.4.** Where the creation of new or the retrofit of roadways or other transportation systems is necessary in areas with sensitive habitats, particularly SEAs, use best practice design to encourage species passage and minimize genetic diversity losses.

### *Los Angeles County Highway Plan*

The Los Angeles County Highway Plan provides policy guidance for building a comprehensive highway network throughout the unincorporated areas (DRP 2015). The Highway Plan provides a highway system that is consistent with and supportive of the goals and policies in the County's General Plan Land Use Element. The Highway Plan maintains right-of-way corridors to ensure space for future facility improvements to accommodate alternative modes. This is important in urbanized areas, which often have limited room for expansion but are in need of additional facilities and improvements, such as bike lanes, sidewalks, and bus service. This is also important in rural areas to accommodate trails and landscaping, which encourage active transportation, provide shade, and reduce runoff from pollutants. The purpose of the Highway Plan is to: 1) depict the general location of planned highway routes; 2) provide a means for protecting highway rights-of-way within the unincorporated areas; 3) establish a plan and process for coordinating highway policies with neighboring cities and counties; and 4) provide for a system of highways that is consistent with the General Plan.

### *Los Angeles County Bicycle Master Plan*

The Los Angeles County Bicycle Master Plan (2012) proposes over 800 miles of new bikeways throughout the County by the year 2032 and provides goals and policies relevant to transportation and traffic, including:

- **Policy 1.1.** Construct the bikeways proposed in the 2012 County of Los Angeles Bicycle Master Plan over the next 20 years.
- **Policy 1.4.** Support the development of bicycle facilities that encourage new riders.
- **Policy 2.1.** Implement projects that improve the safety of bicyclists at key locations.
- **Policy 2.2.** Encourage alternative street standards that improve safety such as lane reconfigurations and traffic calming.
- **Policy 2.4.** Evaluate impacts on bicyclists when designing new or reconfiguring streets.

### *OurCounty: Los Angeles County Sustainability Plan*

In August 2019, the County adopted OurCounty, which contains 12 goals, 37 strategies, and 159 actions and identifies entities and partners that will work together to achieve these goals (LACSO 2019). OurCounty focuses on enhancing the well-being of every community in the county while reducing damage to the natural environment and adapting to the changing climate. The OurCounty goals, strategies, and actions related to transportation are:

**Goal 3:** Equitable and sustainable land use and development without displacement. Utilize policy tools, such as anti-displacement measures, so existing community members can remain in and strengthen their neighborhoods and networks while accepting new residents through more compact, mixed-use development. Pursue outcomes that are inclusive, safe, healthy, accessible, and transit oriented.

**Goal 8:** A convenient, safe, clean, transportation system that enhances mobility and quality of life while reducing car dependency. Provide a modern transportation system for all ages and abilities to access reliable, safe, affordable, and varied mobility choices that reduce pollution. Develop programs that focus on reducing the number of vehicle miles travelled, including transit systems, walking, biking, e-scooters, and zero-emission car-share services.

- ***Strategy 8A:*** Reduce vehicle miles traveled by prioritizing alternatives to single occupancy vehicles.
  - ***Action 97:*** Support Metro's efforts to study congestion pricing and amplify considerations of equity.
  - ***Action 101:*** Develop and implement a transportation demand management (TDM) ordinance that requires developers to incorporate measures such as subsidized transit passes and car share.

### *Vison Zero*

Vision Zero: A Plan for Safer Roadways 2020–2025 (2019) is an Action Plan prepared by the County of Los Angeles as part of a worldwide traffic safety initiative to eliminate traffic-related fatalities. One of the main

principles of Vision Zero is health equity. Streets with sidewalks, marked crosswalks, and bicycle lanes provide opportunities for physical activity and mobility, addressing health equity concerns. Other goals for Vision Zero relevant to transportation and traffic within the Planning Area include:

- Enact policy changes to enhance traffic safety.
- Update infrastructure processes, guidelines, and manuals to facilitate project designs aimed at preventing traffic fatalities and severe injuries.
- Implement programs and amend existing County policies to ensure certain populations are not unduly burdened.
- Implement programs focused on eliminating fatal and severe injury collisions involving youth and older adults.
- Implement traffic safety enhancements to reduce fatal and severe injury collisions involving pedestrians and bicyclists.
- Increase community engagement for traffic safety projects.
- Strengthen public knowledge of traffic safety best practices.

### *Step by Step*

Step by Step Los Angeles County (2019) is a plan designed to enhance walkability for the unincorporated communities of Los Angeles County. The plan outlines actions, policies, procedures, and programs for the County to consider related to enhanced walkability and it identifies potential pedestrian infrastructure projects for specific unincorporated communities. Step by Step is also a strategy for reaching the County's Vison Zero goal, described above, by identifying specific actions, programs, and projects that prioritize pedestrian safety in the design and operations of the County's transportation system. Other goals for Step by Step relevant to transportation and traffic within the Planning Area include:

- **Policy SS-2.** Elevate the pedestrian walking experience by enhancing pedestrian crossings and implementing traffic calming measures where feasible and appropriate.
- **Policy EH-1.** Make transportation, land use, and building design or site planning decisions that make walking a logical first choice transportation option for residents and visitors.
- **Policy EH-2.** Design pedestrian-friendly streets to make walking a convenient first choice for daily activities.
- **Policy EQ-1.** Prioritize the needs of low-income communities of color and the most vulnerable users.

- **Policy EQ-2.** Create a pedestrian network that supports people of all abilities – especially youth, seniors, and those with disabilities. This includes, but is not limited to, wide sidewalks, curb ramps, accessible pedestrian signals to aid the visually impaired, and adequate pedestrian crossing times.

- **Policy SP-1.** Improve air quality and reduce greenhouse gas emissions through reduced car dependency.

### *View Park-Windsor Hills and Ladera Heights Community Traffic Safety Plan*

Supervisor Holly J. Mitchell directed the development of a community traffic safety plan (CTSP) in the View Park, Windsor Hills, and Ladera Heights communities. The CTSP is a comprehensive and proactive process that encompasses all modes of transportation. It is designed to provide guidance for the development of both current and future infrastructure to ensure the safety of all road users in the short and long terms. The project goals and objectives are:

**Goal 1:** Reduce traffic collisions and minimize injuries and fatalities.

- ***Objective 1.1.*** **I**dentify and address high-risk areas by implementing traffic calming measures, improving intersections, installing traffic signals, and enhancing road markings.

**Goal 2:** Improve street facilities and bring up to current standard, where possible.

- ***Objective 2.1.*** Where possible, provide separate facilities for each mode to minimize conflict between modes.

- ***Objective 2.2.*** Provide safety recommendations for areas around community centers (schools, library, parks, etc.)

**Goal 3:** Improve street conditions for all.

- ***Objective 3.1.*** Create an environment that is comfortable for pedestrians by improving crosswalks, sidewalks, and other infrastructure.

- ***Objective 3.2.*** Improve street infrastructure with the goal of reducing pedestrian and bicycle fatalities and injuries resulting from collisions at intersections and along corridors.

**Goal 4:** Help people access employment, education, health care, and recreation facilities.

- ***Objective 4.1.*** Support the development of infrastructure that improves mobility access to and from key origins and destinations.

**Goal 5:** Manage traffic flow.

- ***Objective 5.1.*** Optimize traffic flow to reduce the likelihood of collisions.

- ***Objective 5.2.*** Install signs and road markings to guide and inform drivers.

### 5.17.1.2 EXISTING CONDITIONS

#### Population and Employment

Population and employment provide important data for travel patterns to and from the county, including the Planning Area. According to SCAG's RTP/SCS growth forecast, the unincorporated areas of the county had a population of 1,057,192 and the county as a whole had a population of 10,283, 330 in 2018. As discussed in Section 3, *Project Description*, the Planning Area includes the unincorporated communities of Ladera Heights, View Park, and Windsor Hills; Marina del Rey; Ballona Wetlands; and Westside Islands, which includes West Los Angeles (Sawtelle Veterans Affairs [VA]), West Fox Hills, Franklin Canyon, and Gilmore Island. The Westside Planning Area, including unincorporated and incorporated areas, has a total population of 1,071,794 people based on SCAG's 2016 RTP/SCS. However, Marina del Rey, Ballona Wetlands, and West Los Angeles (Sawtelle VA) are governed by separate planning processes and are not anticipated to undergo changes as a result of the proposed Project. The WSAP focuses primarily on Ladera Heights, View Park, and Windsor Hills and West Fox Hills.

Currently, the areas of Ladera Heights, View Park, and Windsor Hills and West Fox Hills have a combined population of 18,270 people. A breakdown of the population for each area is provided in Table 5.17-1, *Current Population Estimates*.

**Table 5.17-1 Current Population Estimates**

| Community | Population |
|---|---|
| Ladera Heights, View Park, and Windsor Hills | 17,814 |
| West Fox Hills | 456 |
| **Total** | **18,270** |

Source: F&P 2024b.

According to the Westside Area Plan Background Briefs, Ladera Heights had a total working population of 3,093 and 3,459 employees in 2020. There were 3,401 individuals employed in Ladera Heights but residing outside, accounting for 98.3 percent of the Ladera Heights workforce, and 3,035 Ladera Heights residents worked outside the community, accounting for 98.1 percent of the total working population. Only 58 individuals were employed and lived in Ladera Heights, accounting for 1.9 percent of the total working population and 1.7 percent of the workforce. View Park and Windsor Hills had a total of 4,940 working population and 1,556 employees in 2020. There were 1,437 individuals employed in View Park and Windsor Hills but residing outside, accounting for 92.7 percent of the View Park and Windsor Hills workforce, and 4,821 View Park and Windsor Hills residents worked outside the community, accounting for 97.6 percent of the total working population. Thus 119 individuals were employed and lived in View Park and Windsor Hills, accounting for 2.4 percent of the total working population and 7.6 percent of employees (DRP 2023).

## Roadway Network

The Planning Area contains a comprehensive highway network throughout the unincorporated areas of the County. The County's Highway Plan includes the following roadway classifications that apply to roadways within the Planning Area:

**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. Alternative major highway sections may be established by the County to accommodate features such as raised medians, bicycle facilities, and wider parkways with varying right-of-way widths. In rural areas, major highways are intended to maintain a rural appearance (without curb, gutter, and/or sidewalk) to reflect the rural character of various communities throughout Los Angeles County.

**Secondary Highway.** This classification includes urban and rural routes that serve or are planned to serve an areawide 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. Alternative secondary highway sections may be established by the County to accommodate features such as raised medians, bicycle facilities, and wider parkways with varying right-of-way widths. In rural areas, certain connector highways to and between rural communities are also classified as secondary highways. These highways are intended to maintain a rural appearance (without curb, gutter, and/or sidewalk) to reflect the rural character of various communities throughout Los Angeles County. In addition, beyond the ultimate road right-of-way, there may be a need for additional dedications for trail purposes, to accommodate equestrian and other non-vehicular uses.

**Limited Secondary Highway.** This classification includes urban and rural routes that provide access to low-density areas. In urban areas, limited secondary highways generally feature lower traffic volumes and multimodal transportation facilities. Alternative secondary highway sections may be established by the County to accommodate features such as raised medians, bicycle facilities, and wider parkways with varying right-of-way widths. In rural areas, limited secondary highways are generally located in rural communities and remote foothill, mountain and canyon areas. These highways are intended to maintain a rural appearance (without curb, gutter, and/or sidewalk) to reflect the rural character of various communities throughout Los Angeles County. Additional right-of-way width may be required to accommodate left-turn pockets and passing lanes may be provided when required for traffic safety. In addition, beyond the ultimate road right-of-way, there may be a need for additional dedications for trail purposes, to accommodate equestrian and other non-vehicular uses.

**Parkway.** This classification includes urban and rural routes that have park-like features either within or adjacent to the roadway. The right-of-way width required varies as necessary to incorporate these features, typically with a minimum of 80 feet. Roadway improvements vary depending on the composition and volume of traffic carried.

**Expressway.** This classification includes urban and rural controlled-access highways connecting communities. Expressways can generally accommodate six to ten traffic lanes and are intended for thru-traffic, featuring full or partial control of access. The right-of-way required varies as necessary to incorporate these features, but is typically 180 feet in width. Roadway improvements vary depending upon the composition and volume of traffic carried.

### *Ladera Heights, View Park, and Windsor Hills*

There are six major highways that run through Ladera Heights, View Park, and Windsor Hills—La Cienega Boulevard, La Brea Avenue, Overhill Drive, Stocker Street, Slauson Avenue, and Centinela Avenue.

- **La Cienega Boulevard** runs north-south through Ladera Heights. It provides three travel lanes in each direction with a highway divider along most of the roadway.

- **La Brea Avenue** runs north-south through View Park and Windsor Hills, with the segment south of Stocker Street designated a major highway. From Stocker Street to Slauson Avenue, it provides three travel lanes in each direction. From Slauson Avenue to 62nd Place, it provides two travel lanes with a center turn lane along most of the roadway.

- **Overhill Drive** runs north-south through Ladera Heights, View Park, and Windsor Hills, with the segment south of Stocker Street designated a major highway. It provides two travel lanes in each direction with a solid double yellow line along most of the roadway.

- **Stocker Street** runs east-west through Ladera Heights, View Park, and Windsor Hills, with the segment east of La Cienega Boulevard designated a major highway. It provides two travel lanes in each direction with combination of center turn lane and a median strip along most of the roadway.

- **Slauson Avenue** runs east-west through Ladera Heights, View Park, and Windsor Hills. From Bristol Parkway to Fairfax Avenue, it provides three travel lanes with median strips along most of the roadway. From Fairfax Avenue to Angeles Vista Boulevard, it provides three travel lanes with center turn lanes along most of the roadway. From Angeles Vista Boulevard to West Boulevard, it provides two travel lanes with center turn lanes along most of the roadway.

- **Centinela Avenue** runs east-west through Ladera Heights, View Park, and Windsor Hills. It provides two travel lanes with center turn lanes along most of the roadway.

There are two secondary highways that run through Ladera Heights, View Park, and Windsor Hills—Fairfax Avenue and Angeles Vista Boulevard.

- **Fairfax Avenue** runs north-south through Ladera Heights, View Park, and Windsor Hills, with the segment south of Stocker Street to Slauson Avenue designated a secondary highway. It provides one travel lane in each direction.

- **Angeles Vista Boulevard** runs north-south through Ladera Heights, View Park, and Windsor Hills, with the segment north of Slauson Avenue designated a secondary highway. It provides two travel lanes with center turn lanes along most of the roadway.

Local streets provide access to individual parcels and generally provide one travel lane in each direction. All remaining streets not otherwise classified as highways fall under this classification. The existing street system for this area is shown on Figure 5.17-1, *Existing Steet System: Ladera Heights, View Park, and Windsor Hills*.

### *West Fox Hills*

Due to the limited size of this subarea, the circulation components described here are small segments of larger networks of streets. Centinela Avenue and Jefferson Boulevard are designated major highways.

- Centinela Avenue provides three travel lanes in each direction with a center turn lane.
- Jefferson Boulevard provides three westbound travel lanes and four eastbound travel lanes with median strips and vegetation.

The existing street system for this area is shown on Figure 5.17-2, *Existing Steet System: West Fox Hills*.

## Collision Corridors

The Los Angeles County Vision Zero Program identified 200 collision-concentration corridors based on collision data collected between 2013 and 2017. Eight corridors are in Ladera Heights, View Park, and Windsor Hills, as shown in Table 5.17-2, *Collision Centration Corridors in Ladera Heights, View Park, and Windsor Hills*. Although these are not the top 20 collision concentration corridors identified in the Vision Zero program, there were fatal and severe injury collisions that occurred in these corridors during the past five years.

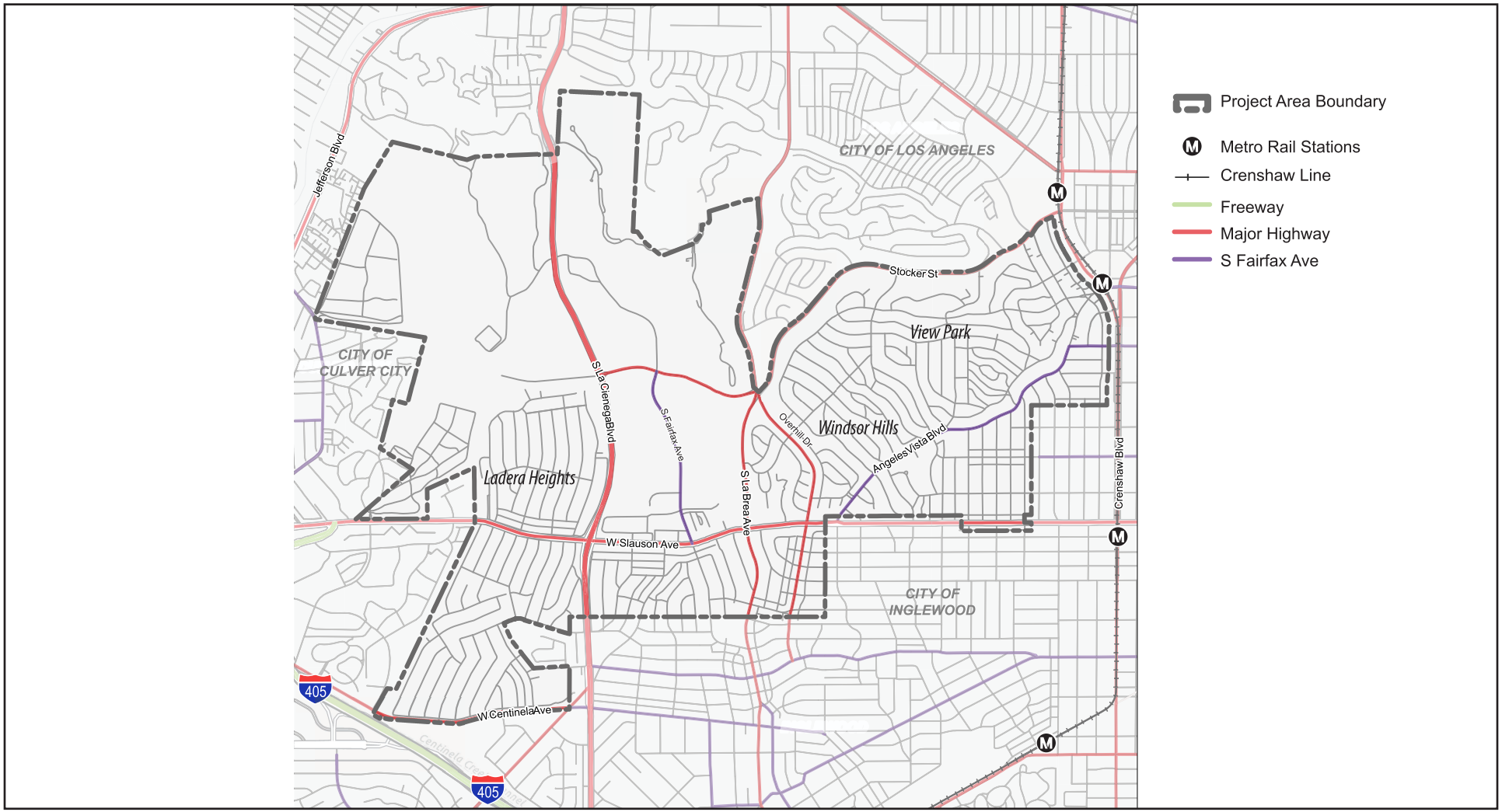
Due to the limited size of West Fox Hills, the collision corridor is limited to Centinela Avenue. Three collisions have occurred along Centinela Avenue from January 1, 2018, through December 31, 2022.

**Table 5.17-2 Collision Centration Corridors in Ladera Heights, View Park, and Windsor Hills**

| Roadway | Approximate Limits | Length (miles) | Number of Fatalities and Severe Injury Collisions (2018-2022) |
|---|---|---|---|
| Centinela Avenue | Green Valley Cir to Alvern Street | 0.5 | 2 |
| La Brea Avenue | Slauson Avenue to 62nd Place | 0.5 | 3 |
| Slauson Avenue | Alviso Avenue to West Boulevard | 0.5 | 2 |
| Stocker Street | 1200 feet west of Presidio Drive to Angeles Vista Boulevard/ Santa Rosalia Drive | 0.5 | 3 |
| La Cienega Boulevard | 5000 feet north of Stocker Street to 2400 feet north of Stocker Street | 0.5 | 0 |
| La Cienega Boulevard | 500 feet south of Stocker Street to 500 feet south of Slauson Avenue | 0.7 | 1 |
| Stocker Street | 500 feet west of Don Lorenzo Drive to Don Miguel Drive | 0.5 | 3 |
| Overhill Drive | Stocker Street to Onacrest Drive | 0.5 | 2 |

Source: DPR 2023.

## Figure 5.17-1 - Existing Street System: Ladera Heights, View Park, and Windsor Hills




Source: LA County; Fehr & Peers.

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## Figure 5.17-2 - Existing Street System: West Fox Hills


Source: LA County; Fehr & Peers.

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## Public Transportation System

### *Ladera Heights, View Park, and Windsor Hills*

#### *Transit*

Ladera Heights, View Park, and Windsor Hills are served by four different transit providers: Metro; City of Los Angeles Department of Transportation (LADOT); Culver City Bus; and the Link, operated by Public Works. The Metro K Line (rail) runs north-south along Crenshaw Boulevard, and Martin Luther King Jr Station is less than a quarter mile from the northeast corner of the community. Metro Line 212 (transit) connects to Metro Hollywood/Vine Station, which makes connections to Downtown Los Angeles via Metro B Line. Metro Line 40 (transit) connects the community directly to downtown Los Angeles. Culver City Bus Route 3 provides connections to Century City. Table 5.17-3, *Existing Transit Service in Ladera Heights, View Park, and Windsor Hills*, displays operational information for transit lines serving Ladera Heights, View Park, and Windsor Hills. Figure 5.17-3, *Existing Transit System: Ladera Heights, View Park, and Windsor Hills*, shows existing transit routes and stops. Existing transit stops within a half-mile walking distance cover approximately 93 percent of the Planning Area.

**Table 5.17-3 Existing Transit Service in Ladera Heights, View Park, and Windsor Hills**

| Transit Route | Operator | Service Type | Service From |
|---|---|---|---|
| Metro K Line | Metro | Rail | Exposition/Crenshaw–Westchester/Veterans |
| 40 | Metro | Local | Downtown Los Angeles–South Bay Galleria via Marther Luther King Boulevard/Hawthorne Boulevard |
| 102 | Metro | Local | LAX City Bus Center–South Gate via La Tijera-Exposition Boulevard |
| 108 | Metro | Local | Marina Del Rey–Pico Rivera via Slauson Avenue |
| 110 | Metro | Local | Playa Vista–Bell Gardens via Jefferson Boulevard/ Gage Avenue |
| 210 | Metro | Local | Hollywood/Vine Station–South Bay Galleria via Vine Street-Wilshire/Western Station-Crenshaw Boulevard |
| 212 | Metro | Local | Hollywood/Vine Station–Hawthorne/Lennox Station via La Brea Avenue |
| CC 3 | Culver City Bus | Local | Culver City–Century City |
| CC 4 | Culver City Bus | Weekday Community Circulator Route | Culver City–West Los Angeles Transit Center |
| DASH Crenshaw | LADOT | Local | Jefferson Boulevard–Martin Luther King Jr Station |
| Leimert/Slauson | LADOT | Local | Martin Luther King Jr Boulevard–Slauson Avenue |
| Baldwin Hills Parklands Shuttle | PW The Link | Weekend Shuttle | Baldwin Hills Scenic Overlook–Kenneth Hahn State Recreation Area |

Source: DRP 2023.

### *Bicycle Facilities*

Ladera Heights and View Park-Windsor Hills have a bicycle network with approximately 1.4 miles of Class III bike routes along Slauson Avenue and Valley Ridge Avenue. The bike route on Slauson Avenue connects to the Class II bike lane east of Angeles Vista Boulevard. Class II bike lanes are defined as a portion of the roadway that has been designated by striping, signage, and pavement markings for the preferential or exclusive use of bicyclists. Class III bike routes are defined as facilities shared with motor vehicles. The bicycle facilities for this area are shown on Figure 5.17-4, *Existing and Proposed Bicycle Facilities: Ladera Heights, View Park, and Windsor Hills*.

It should be noted that Los Angeles County Public Works is in the process of updating the Bicycle Master Plan, which is scheduled to be finalized in early 2025. The updated plan will propose new bikeways, revisit the feasibility of unconstructed bikeways from the 2012 plan, incorporate new policies to share bikeway facilities with micro-mobility devices, identify first/last mile bikeway improvements to further connect to transit stations and bus stops, and prepare a programmatic environmental impact report.

In addition to the bicycle network, the 13-mile Park to Playa Regional Trail runs along the northern boundary of the community and connects to a network of trails, parks, and open spaces from the Baldwin Hills Parklands to the Pacific Ocean.

## *West Fox Hills*

### *Transit*

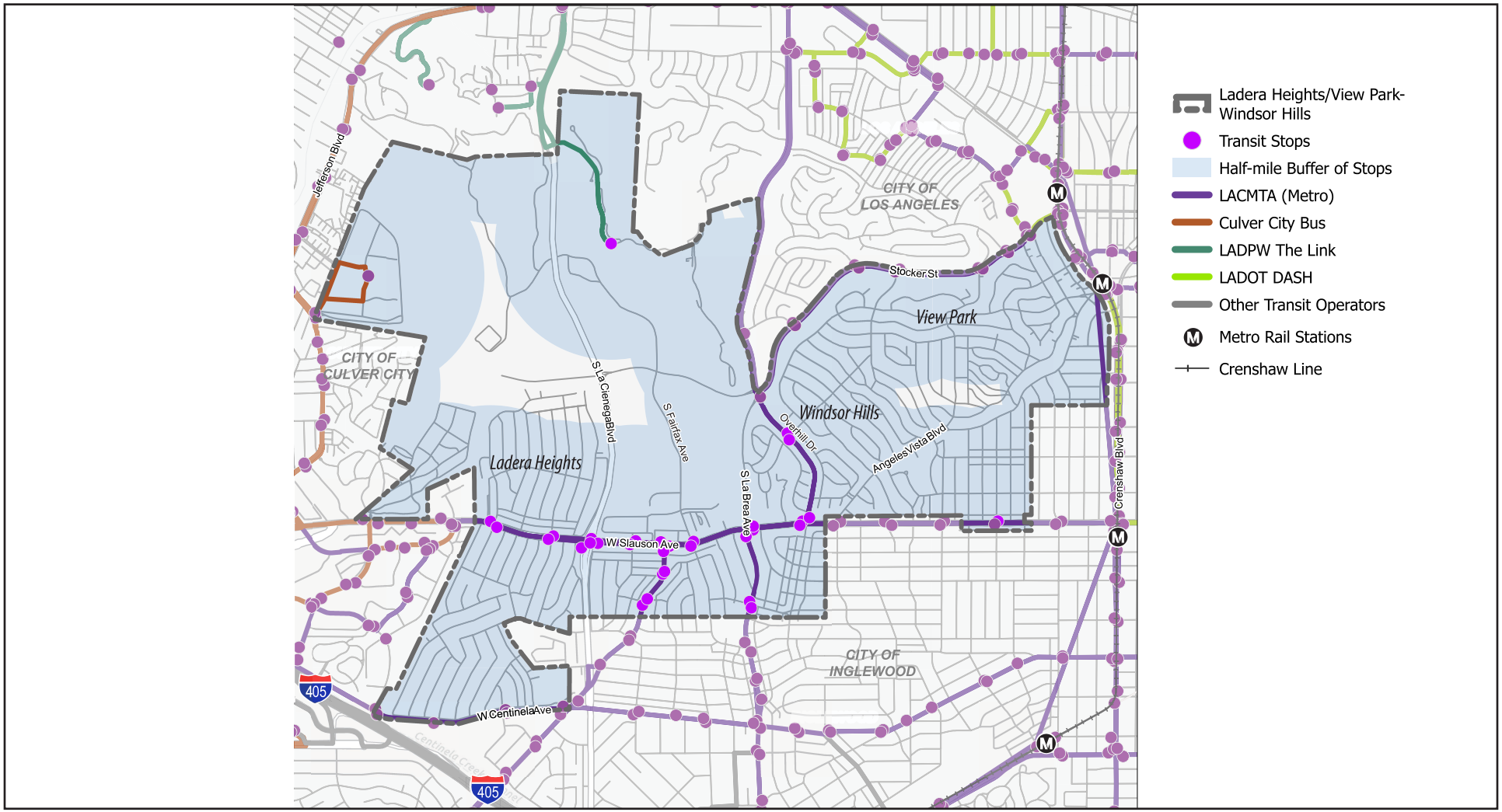
West Fox Hills is served by four different transit providers: Metro, LADOT, Culver City Bus, and Big Blue Bus. LADOT Commuter Express 437 connects the community to downtown Los Angeles. Metro Lines 108 and 110 provide connections to the east side of the County. Existing transit stops are within a half-mile walking distance for all the area. Table 5.17-4, *Existing Transit Service in West Fox Hills*, displays operational information for transit lines serving West Fox Hills. Figure 5.17-5, *Existing Transit Service: West Fox Hills*, shows existing transit routes and stops.

**Table 5.17-4 Existing Transit Service in West Fox Hills**

| Transit Route | Operator | Service Type | Service From | Weekday Peak Hours Headways (AM/PM) |
|---|---|---|---|---|
| 108 | Metro | Local | Marina Del Rey–Pico Rivera via Slauson Avenue | 15 minutes |
| 110 | Metro | Local | Playa Vista–Bell Gardens via Jefferson Boulevard-Gage Avenue | 15 minutes |
| CC 4 | Culver City Bus | Weekday Community Circulator Route | Culver City–West Los Angeles Transit Center | 60 minutes |
| 437 | LADOT | Commuter Express | Venice–Downtown Los Angeles | 25 minutes / 30 minutes |
| 14 | Big Blue Bus | Local | Westchester/Veterans Station–Brentwood | 10–20 minutes / 20 minutes |

Source: DRP 2023.

## Figure 5.17-3 - Existing Transit Service: Ladera Heights, View Park, and Windsor Hills




Source: LA County; Fehr & Peers.

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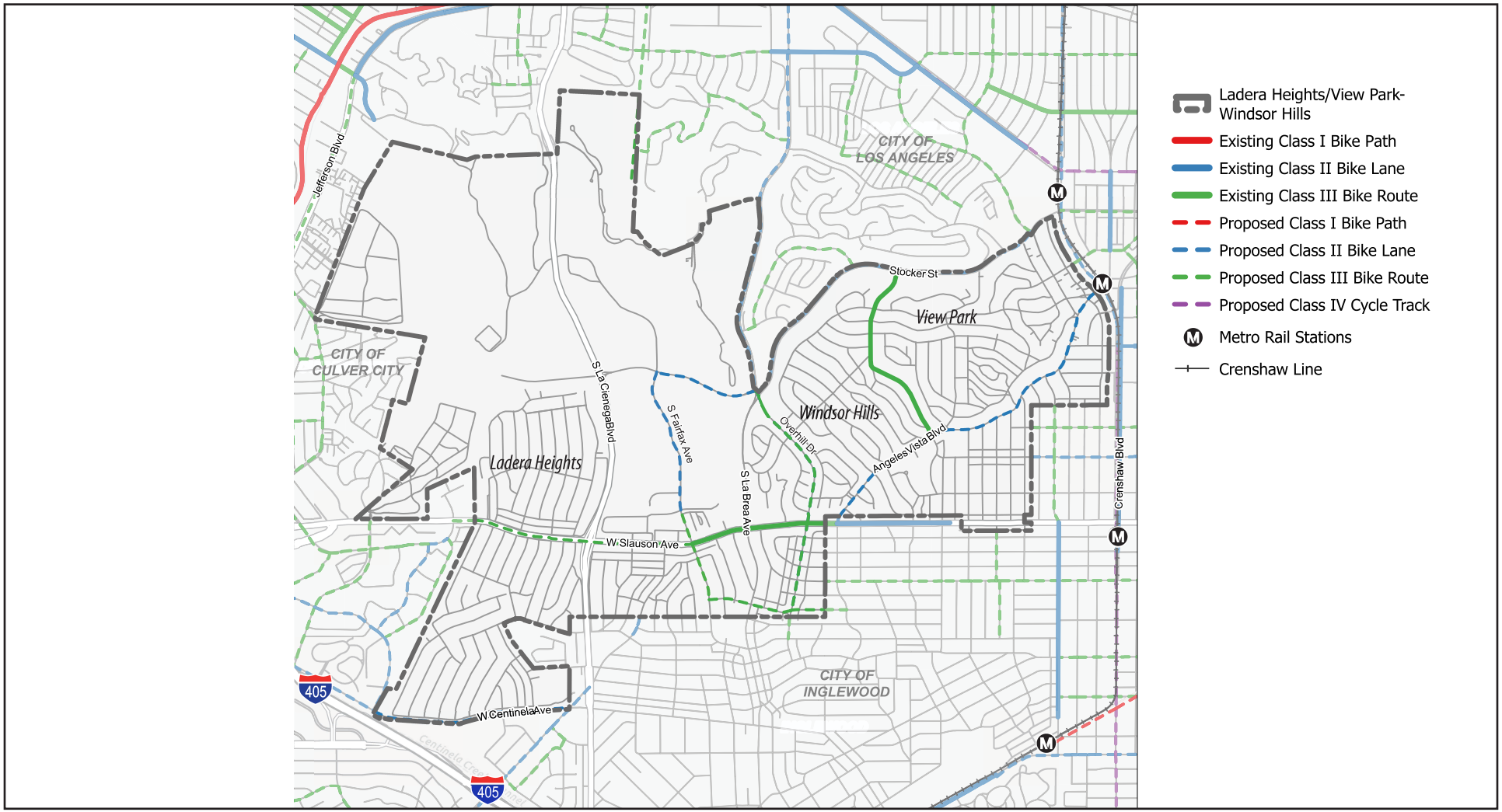
## Figure 5.17-4 - Existing and Proposed Bicycle Facilities: Ladera Heights, View Park, and Windsor Hills




Source: LA County; Fehr & Peers.

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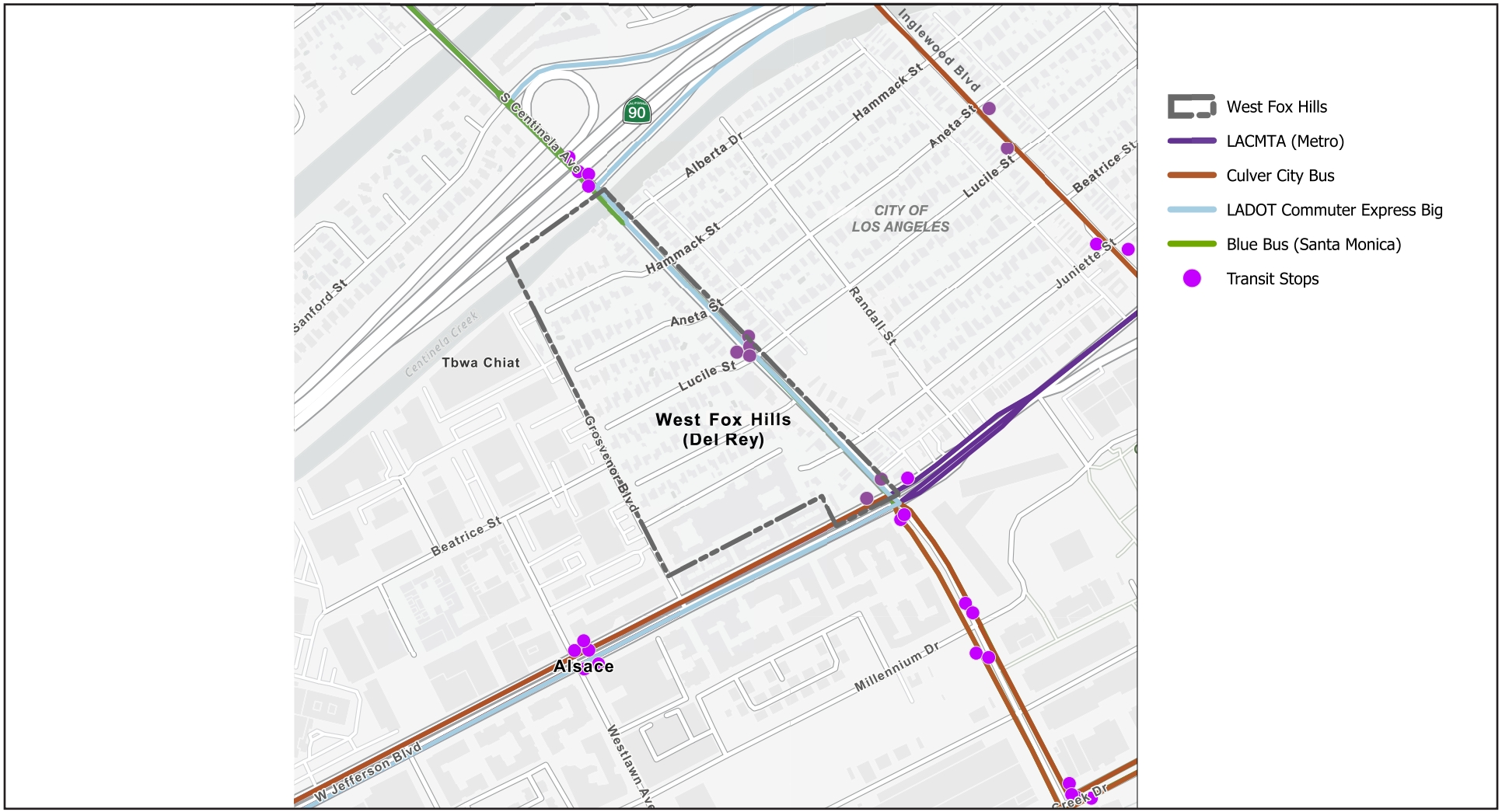
## Figure 5.17-5 - Existing Transit Service: West Fox Hills




*Source: LA County; Fehr & Peers.*

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#### *Bicycle Facilities*

There is no existing bike facility within West Fox Hills, but two Class III bike routes are proposed along nearby Lucile Street and Beatrice Street (DPW 2012). In areas outside the community, there are Class II bike lanes along streets south of Jefferson Boulevard, such as Millennium Drive and Bluff Creek Drive. The proposed Class III bike routes would fill in the gap between the community and this existing bicycle network. Class II bike lanes are defined as a portion of the roadway that has been designated by striping, signage, and pavement markings for the preferential or exclusive use of bicyclists. Class III bike routes are defined as facilities shared with motor vehicles. Figure 5.17-6, *Existing and Proposed Bicycle Facilities: West Fox Hills*, shows proposed bicycle facilities in the community.

### Vehicle Miles Traveled

#### *Residential VMT and Employment VMT*

Residential VMT is generated by Home-Based Work and Home-Based Other trip productions. Employment VMT is generated by Home-Based Work trip attractions. These two types of VMT were estimated at tier 2 transportation analysis zone (TAZ) level based on trips that have one end in the community area and fully account for the entire trip length. The existing daily residential VMT per capita in Ladera Heights, View Park, and Windsor Hills in 2023 is estimated at 12.0, and the daily residential VMT per capita in West Fox Hills in 2023 is estimated at 10.9. This is lower than Los Angeles County's baseline, which is a daily residential VMT per capita of 12.6 in 2023. Daily employment VMT per employee in Ladera Heights, View Park, and Windsor Hills is estimated at 16.5, slightly higher than the 2023 baseline of 16.1 employment VMT per employee in the unincorporated areas of Los Angeles County. Daily employment VMT per employee in West Fox Hills is estimated at 17.6, higher than the County's 2023 baseline of 16.1 employment VMT per employee (DRP 2023).

#### *Total VMT*

Total VMT is the VMT generated by all vehicle trips (i.e., passenger and commercial vehicles). It was estimated using the Origin-Destination (OD) method at the tier 1 TAZ level. One of the trip ends must be within the community area and the entire trip length fully accounted for. The daily total VMT per service population in Ladera Heights, View Park, and Windsor Hills in 2023 is estimated at 25.9, lower than the County's 2023 baseline of 30.6 total VMT per service population. This is because the community is close to areas that provide jobs and commercial uses, such as Culver City, Playa Vista, and Los Angeles International Airport. In the tier 1 TAZ for West Fox Hills, daily total VMT per service population in 2023 is estimated at 35.9, higher than the County's 2023 baseline of 30.6 total VMT per service population. This is because the tier 1 TAZ boundary includes a lot more commercial land uses outside of West Fox Hills (DRP 2023).

## 5.17.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

T-4 Result in inadequate emergency access.

With respect to consistency with CEQA Guidelines Section 15064.3, subdivision (b), the County's Transportation Impact Analysis Guidelines provides a significance threshold for VMT impacts for land use projects and plans of 16.8 percent reduction from Baseline VMT.

## 5.17.3 Environmental Impacts

### 5.17.3.1 METHODOLOGY

This program-level Draft PEIR evaluates potential transportation impacts based on the location of the proposed opportunity sites associated with the forecast development pattern and transportation projects. The following impact analysis is based on guidance outline in the County's Transportation Impact Analysis Guidelines, which is consistent with SB 743, and the State CEQA Guidelines, which require an analysis of VMT as a regional performance measure. Per the County's Transportation Impact Analysis Guidelines, a VMT assessment was prepared for the entire WSAP area, including both unincorporated communities and incorporated cities. The results of the VMT analysis are provided in the VMT Analysis Memo (Appendix XX) and are summarized below. The existing conditions analysis in this Draft PEIR refers to conditions modeled in the baseline year 2024. The future buildout year is 2045.

#### Vehicle Miles Traveled

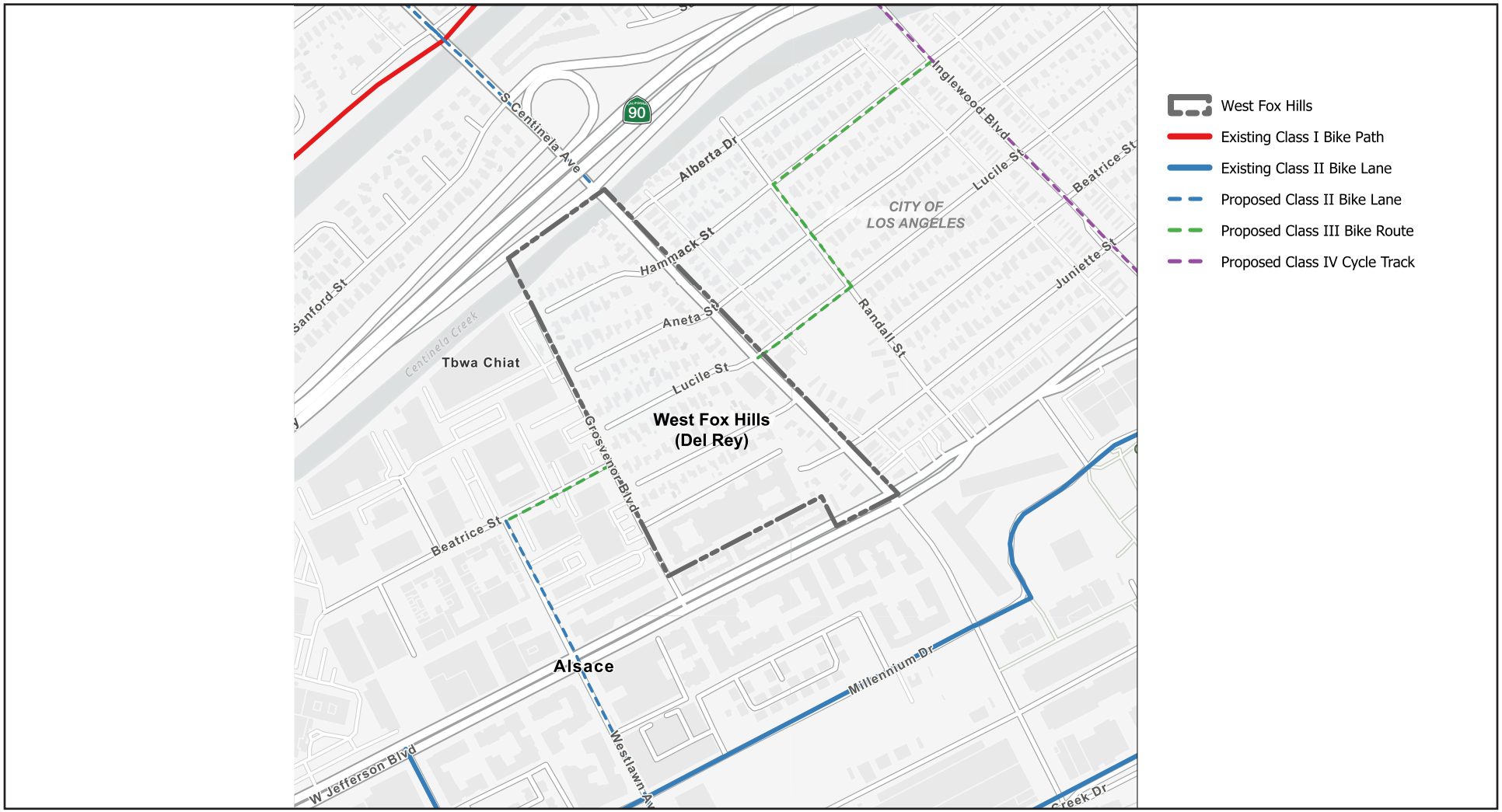
Los Angeles County has prepared an SB 743 Implementation and CEQA Updates Report. CEQA Section 15064.3(a) defines VMT as "the amount and distance of automobile travel attributable to a project." The term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. For land use projects and plans, such as the WSAP, based on the predominant use, the following VMT efficiency metrics and method of estimation can be used:

- **Total VMT per Service Population.** The total VMT to and from all zones in the geographic area are divided by the total service population to get the efficiency metric of VMT per service population. The total service population is the sum of the number residents and the number of employees.

Per the County's Transportation Impact Analysis Guidelines, key transportation measures for the Planning Area, including daily VMT and total VMT per service population, were estimated using the SCAG 2016 RTP/SCS Travel Demand Forecast Model.[1] VMT is influenced by the households, population, and employment densities within the Planning Area.

[1] Although SCAG has adopted Connect SoCal as the 2024 RTP/SCS, the 2016 Travel Demand Model is the most current version.

## Figure 5.17-6 - Existing and Proposed Bicycle Facilities: West Fox Hills




Source: LA County; Fehr & Peers.

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### *Baseline*

Per the metrics and thresholds established in the LA County Guidelines, the WSAP would have a potentially significant VMT impact if daily total VMT per service population estimated for the horizon year (the "Future Plus Project" scenario) exceeds LA County's threshold of 16.8 percent below the County Baseline VMT for 2024. The County is in the process of updating its guidelines to reflect updated baseline VMT data and thresholds. The updated baseline VMT data was used based on direction from the County and was taken from the LA County Baseline VMT Data memorandum, dated January 26, 2022, which provides the new baseline VMT thresholds for LA County. The 2024 baseline for daily VMT per service population and the threshold for 16.8 percent below the baseline are provided in Table 5.17-5, *LA County VMT Metrics and Thresholds*.

**Table 5.17-5 LA County VMT Metrics and Thresholds**

| | 2024 County Baseline | 16.8% Below 2024 County Baseline |
|---|---|---|
| Total Daily VMT per Service Population | 30.4 | 25.3 |

Source: F&P 2024a.

### *Modeling*

Per the LA County guidelines, a land use project's cumulative effects are determined through consistency with the RTP/SCS. Land use projects that: (1) demonstrate a project impact after applying an efficiency-based VMT threshold and (2) are not deemed consistent with the RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether the project's cumulative impact on VMT is significant. The cumulative impact analysis involves comparing the cumulative "no project" scenario, representing RTP/SCS cumulative year conditions, to the cumulative "plus project" scenario, representing reallocation of the population/employment growth associated with the proposed Project.

Socioeconomic data (SED) is used as the input data for VMT modeling and established the buildout for the Future No Project and Future Plus Project conditions. In addition to SCAG Model base year (2012) and horizon year (2040) data, the following data sources were used to develop the SED forecasts:

- WSAP buildout data
- Los Angeles County unincorporated areas dwelling unit vacancy rates

SED inputs for the Planning Area under Future No Project and Future Plus Project are shown in Table 2 of Appendix E.

*2045 Future No Project*

The 2045 Future No Project scenario represents SCAG's RTP/SCS cumulative year conditions. Per the County's guidance, SCAG Model SED of base year (2012) and horizon year (2040) extrapolated to year 2045 was used for Future No Project scenario.

*2045 Future Plus Project*

The 2045 Future Plus Project scenario integrated the WSAP buildout data for unincorporated areas.

*Transportation Network Projects Complete by Horizon Year*

The model includes future transportation network projects that are assumed to be complete by the 2045 horizon year. In addition, the analysis considers one of the County's local plans that contained local roadway safety/capacity modifications:

- View Park-Windsor Hills and Ladera Heights Community Traffic Safety Plan, Los Angeles County Public Works and Los Angeles County Supervisor Holly J. Mitchell, November 2023

The CTSP focuses on roadway safety within the Ladera Heights, View Park, and Windsor Hills communities. While the plan recommends a variety of safety treatments, there are limited treatments that would reduce or expand vehicular capacity to the extent that it would influence VMT. Specifically, CTSP proposes to reduce two vehicle lanes to one in each direction on two corridors—Overhill Drive between Stocker Street and Slauson Avenue, and Angeles Vista Boulevard between Mullen Avenue and Slauson Avenue and between Hillcrest Drive and 48th Street. Per the County's guidance, these lane reconfiguration projects are in the early conceptual stages, and no decisions have been made regarding implementation. Therefore, no changes to the highway and transit networks were made in the model.

### 5.17.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

The WSAP is intended to the guide long-term growth of the Planning Area, promote active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to foster economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to support sustainable mobility options in an enhanced built environment.

Because the WSAP is planning for future growth within the Planning Area, no actual development is being proposed at this time.

#### Mobility Element

**Goal M 1:** A safe, efficient and accessible transportation network for all Westside communities.

- **Policy M 1.2.** Implement safety countermeasures along Collision Concentration Corridors that are identified in the Los Angeles County Vision Zero Action Plan.
- **Policy M 1.3.** Continue to work with LA Metro and other transit agencies (such as Culver City Bus, LADOT, PW The Link, Big Blue Bus, etc.) to provide reliable, safe, and high-quality service.
- **Policy M 1.6** Design pedestrian infrastructure to align with federal, state, and local design guidance and ADA accessibility standards to ensure accessibility for vulnerable users.

**Goal M 2:** A safe transportation network for users of all ages and abilities.

- **Policy M 2.1.** Improve road safety by implementing measures outlined in the View Park-Windsor Hills and Ladera Heights Community Traffic Safety Plan (CTSP). This includes traffic calming measures, intersection improvements, installation of traffic signals, and enhancement of road markings, among other recommendations. The installation of these safety improvements will consider the historic nature of neighborhoods.

- **Policy M 2.3.** Annually review the Capital Project Program list and the CEO's Capital Programs for opportunities to incorporate roadway safety improvements proposed by CTSP into upcoming projects.

**Goal M 3:** Improved access to reliable, safe, and high-quality transit service

- **Policy M 3.1.** Promote the use of transit by strategically orienting new developments around major transit stops and high-quality transit corridors. Apply the Los Angeles County Transit Oriented District (TOD) Design Guideline to new projects and emphasize design elements that facilitate transit use, including pedestrian walkways, bus plazas, and similar features.

**Goal M 4:** Pedestrian and bicycle infrastructure is safe, connected, and comfortable for users of all ages and abilities.

- **Policy M 4.1.** Provide continuous pedestrian access along major streets with existing sidewalk gaps, such as La Brea Avenue between Slauson Avenue and Obama Boulevard, and Overhill Drive between Slauson Avenue and La Brea Avenue.

- **Policy M 4.8.** Provide safe and continuous pedestrian networks that are mindful of user, roadway, and community characteristics through improvements to existing pedestrian areas.

- **Policy M 4.10.** Provide wide sidewalks, pedestrian lighting, wayfinding signage, enhanced crosswalks with ADA-compliant curb ramps, and other amenities to improve pedestrian safety and comfort to access Metro K Line stations and bus stops.

**Goal M 5:** Transportation Demand Management Strategies are promoted to reduce vehicle trips and encourage sustainable transportation.

- **Policy M 5.1.** Work with schools, parents, and students to develop transportation demand management (TDM) strategies that encourage active and transit modes of travel to and from school. Update the Los Angeles County Suggested Pedestrian Route to School at least bi-annually with schools' and parents' feedback.

- **Policy M 5.2.** Work with the community and local businesses to develop TDM strategies (such as commute trip reduction programs, subsidized or discounted transit passes, etc.) for commuting that meet the needs of residents and employees.

- **Policy M 5.3.** Coordinate with residents/employees, transit agencies, and community-based organizations to effectively promote and educate the public about TDM strategies.

**Implementation Program MI 8**. Develop Community Pedestrian Plans for Ladera Heights, View Park-Windsor Hills, and West Fox Hills communities for inclusion in Step-by-Step Los Angeles County: Pedestrian Plans for Unincorporated Communities with the aim of promoting healthy and active lifestyles. Include following study items:

- Explore mobility programs to increase transit access for underserved communities and vulnerable users, focusing on addressing walking challenges along steep streets, especially for seniors and people with disabilities.
- Evaluate the feasibility of a pedestrian bridge at the five-leg intersection of Stocker Street/La Brea Avenue/Overhill Drive to enhance pedestrian safety and community connections.
- Conduct a walk audit with community members and stakeholders along Slauson Avenue, Overhill Drive, La Brea Avenue, La Cienega Boulevard, Centinela Avenue, and Angeles Vista Boulevard to identify intersections for potential improvements to pedestrian facilities. Focus on intersections around intensified development, such as La Cienega Boulevard/La Tijera Boulevard, Centinela Avenue/La Tijera Boulevard, Slauson Avenue/Fairfax Avenue, Slauson Avenue/Overhill Drive. Identify locations to improve crosswalk design features, such as crosswalk markings, curb extensions, and median islands.
- Conduct safety studies at intersections identified from the walk audit mentioned above and consider signal timing modifications to enhance safety for people crossing with lower mobility speeds, including youth, seniors, and the disabled. Potential signal timing improvements includes increased crossing time, Leading Pedestrian Intervals (LPI), protected turns, etc.

### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.2.** Concentrate development in proximity to the Crenshaw Line (5K Line) transit station and along major bus corridors, including Slauson Avenue.
- **Policy LU 2.3.** Encourage the revitalization and enhancement of the Slauson Avenue corridor by maintaining or adaptively re-using commercial buildings for neighborhood serving uses, while expanding opportunities for moderate-scale mixed use or housing.

**Goal LU 3:** A community of distinct and livable places

- **Policy LU 3.3.** Concentrate development along Slauson Avenue to establish activity centers that promote pedestrian-activity, reduce automobile travel, and contribute to the reduction of greenhouse gases.
- **Policy LU 3.4.** Create an active and safe pedestrian environment by improving the sidewalks, intersection crossings, and street frontages.

- **Policy LU 3.5.** Maintain a consistent street wall along key commercial centers and require buildings and entrances to orient to the sidewalk along thoroughfares.

### 5.17.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.17-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? [Threshold T-1]**

**Less Than Significant Impact.** The proposed Project includes a Mobility Element that outlines policies to improve mobility within the Planning Area. The Mobility Element supports the use of alternative modes of transportation, including walking, bicycling, and transit, to increase access opportunities and community connectivity (WSAP Goal M 4) and reduce impacts of traffic-related emissions (WSAP Goal M 5 and Policy LU 3.3). The Mobility Element also include policies related to improving pedestrian and bicycle safety and reducing other transportation-related safety hazards (WSAP Policies M 1.2, M 1.3 , M 1.6, M 2.1, M 2.3, M 4.1, M 4.8, M 4.10, and LU 3.4)

Through implementation of the WSAP Mobility Element, the County will provide safe and convenient access to transit, bikeways, and walkways by considering the safety and convenience of pedestrians and cyclists in the design and development of transportation systems.

The County's Bicycle Master Plan identifies several bicycle improvements within the Planning Area, and the Mobility Element would support these improvements by identifying locations where infrastructure remains disconnected between jurisdictions (WSAP Goal M 4). These improvements would provide bicycle facilities and pedestrian improvements with the goals of the Caltrans Highway Design Manual for Complete Streets, Bicycle Master Plan, Active Transportation Plan, Regional Greenways Study, Step by Step, and OurCounty Sustainability Plan.

The WSAP would amend the Planning and Zoning Code to implement the goals and policies of the Area Plan, including improving the walkability of neighborhoods and increasing accessibility to transit. Proposed changes to land use and zoning as part of the proposed Project is intended to enhance the transportation network and prioritize safety, accessibility, and sustainability for both residents and local businesses.

The growth and increases in density that are proposed in the WSAP were guided by Connect SoCal and the General Plan. The WSAP would place growth near planned or existing transit stations and areas, commercial retail service areas, and active transportation corridors, consistent with goals and policies of the County General Plan. While the WSAP would result in increases in density and development intensity, which could result in population growth, this growth would not be unplanned and would be consistent with existing regional planning document assumptions regarding population growth and transportation infrastructure capacity. WSAP Policies M 3.1, LU 2.2, and LU 3.3 encourage development in proximity to active transportation

corridors. Therefore, implementation of the WSAP would improve operating conditions within the Planning Area.

While LOS for roadway operations is no longer used as a CEQA transportation metric, the County's Transportation Impact Analysis Guidelines still include LOS and queuing methodologies for the evaluation of operation of project driveways and nearby intersections for projects to satisfy non-CEQA project requirements(DPW 2020). Because this is a program-level analysis, additional analysis and mitigation would occur at the project-level to determine specific physical-, program-, and policy-level mitigation measures to reduce the level of impact to roadway operations as a result of specific development.

The policies of the State, regional, and local transportation plans described above were reviewed to ensure consistency with the draft Mobility Element policies. As the Mobility Element policies are broadly consistent with the policies of the applicable transportation programs and plans, future recommendations for mobility improvement projects that would implement the Mobility Element policies would meet the guidelines for potential funding opportunities, and there would be no conflicts between implementation of the Mobility Elements and existing applicable programs related to circulation within the county.

Therefore, while the proposed WSAP would result in growth within the Planning Area, this growth would be concentrated in areas with access to transit, and land use changes were developed consistent with regional plans to create more connected and walkable communities. Therefore, the WSAP is consistent with all applicable plans and programs related to transportation, and impacts would be less than significant and no mitigation is required.

**Impact 5.17-2: Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? [Threshold T-2]**

**Significant and Unavoidable Impact.** The proposed WSAP would establish the regulatory framework for future land use changes and mobility improvements to help the County provide a safe and multimodal transportation system that addresses challenges and meets the needs of all mobility users in the Westside communities. These goals are identified in the proposed WSAP, as well as the related plans and programs identified above. The proposed WSAP provides policies and standards that support the integration of new land uses with a balanced, coordinated transportation network that will provide mobility for all transportation users. The proposed Mobility Element aims to enhance the transportation network and prioritizes safety, accessibility, and sustainability for both residents and local businesses.

Though the proposed Mobility Element and Land Use Element contain a variety of mobility and land use strategies, there are no improvements that would reduce or expand vehicular capacity to the extent that it would significantly influence VMT. Some strategies would help to reduce individual passenger car use (WSAP Policies M 5.3, LU 2.2, LU 2.3, LU 3.3, and LU 3.4, ), but do not meaningfully affect the primary transit modes in the Planning Area; thus, no changes to the highway and transit networks were made as part of the VMT modeling assumptions. The proposed land use and zone changes at the identified Opportunity Sites would allow for higher residential densities, which would help to reduce VMT; however, it is not anticipated that it would significantly influence VMT.

## Vehicle Miles Traveled per Service Population

As described in Section 5.17.3.1, *Methodology*, daily VMT per service population within the Planning Area was analyzed for the proposed Project. Table 5.17-6, *WSAP VMT Summary*, provides a comparison of the VMT per service population calculations for the WSAP Planning Area 2024 Existing (Baseline), Planning Area 2045 No Project (existing General Plan assumptions), and 2045 with Project. As shown in Table 5.17-6, under the 2045 with-Project scenario, the total VMT per service population in the WSAP generated by the proposed changes in land use would be 1.3 percent (25.6 VMT per service population) more than the existing countywide VMT per service population.

**Table 5.17-6 WSAP VMT Summary**

| | 2024 County Baseline | 2024 County VMT Threshold (16.8% Below 2024 County Baseline) | 2045 Plus Project (WSAP) Conditions | Percent Difference between Baseline & WSAP |
|---|---|---|---|---|
| Total Daily VMT per Service Population | 30.4 | 25.3 | 25.6 | 1.3% |

Source: F&P 2024a.

The total VMT per service population under the 2045 with-Project scenario is estimated at 25.6. The significance threshold of 16.8 percent below the County baseline for 2024 is 25.3 total VMT per service population (16.8 percent below 30.4). Thus, with a 25.6 total VMT per service population, the proposed WSAP would result in a potentially significant VMT impact. It should be noted that the County baseline is heavily influenced by more densely developed, transit-rich areas of central Los Angeles County, in contrast to the largely suburban nature of development in the Planning Area (with or without the proposed Project), which results in higher VMT per capita than the countywide average.

To mitigate the total VMT per service population impact to a less-than-significant level, the proposed Project's 25.6 total daily VMT per service population would need to be reduced to less than 25.3 total daily VMT per service population. As described above, the WSAP Land Use Element and Mobility Element include policies to focus growth around major transit stops and high-quality transit corridors. Through implementation of the proposed WSAP, the County will work to implement these policies in coordination with State, regional, and local agencies to ensure projects throughout the Planning Area contribute to the region achieving a substantial reduction in VMT. In addition, Mitigation Measure T-1 ensures the County's commitment to exploring the feasibility of future VMT mitigation program concepts, such as VMT fees, to continue striving to reach the County's reduction targets.

TDM strategies are strategies to reduce the number of single-occupant vehicles generated by the Project through site modifications, programming, and operational changes. As described in Section 5.17.1.1, *Regulatory Background*, Action 101 under the OurCounty Sustainability Plan directs the County to implement a TDM ordinance that would require developers to incorporate TDM measures. Mitigation Measure T-2 requires all future implementing agencies and project applicants to consider a menu of TDM strategies that could be implemented to achieve a reduction in project-generated trips and employee commute trips until a formal TDM ordinance is adopted. At a project-level, the effectiveness of specific TDM strategies ranges from 0 percent to

31 percent reduction in VMT, as documented in the California Air Pollution Control Officers Association publication, "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity" (CAPCOA 2021). While Mitigation Measure T-2 will serve to reduce VMT, even enacting every practical TDM strategy would not achieve a cumulative 1.3 percent reduction in VMT for the Planning Area. The predominantly suburban land use context of the Planning Area may limit the effectiveness of many TDM strategies because there are relatively few effective alternatives to driving for most trips, and most destinations (work, education, shopping, services) are relatively far from any given home in the Planning Area. TDM strategies are less effective with housing alone than in combination with other land uses nearby, such as employment. Since the WSAP buildout would increase the overall service population of the Planning Area and would add more housing to an area with relatively little employment, an overall increase in VMT per service population would occur. Strategies encouraging walking, biking, and transit, for example, would only have a marginal effect because the destinations are still too far to effectively reach in a reasonable time by means other than driving.

However, as described above, the WSAP includes several policies related to the distribution of the planned growth to promote active transportation and transit use (WSAP Policies M 1.3, M 3.1, M 5.1, M 5.2, M 5.3, and LU 2.2 and Goal M 4). Policies in the WSAP Land Use Element and Mobility Element are designed to support more mixed-use development, enhance pedestrian activities, and increase pedestrian and multimodal accessibility. Through the development of the transportation network (including automobile, pedestrian, bike, and transit) within the unincorporated communities of Ladera Heights, View Park, and Windsor Hills and West Fox Hills, implementation of the WSAP would reduce vehicle trips within residential neighborhoods that currently rely on vehicles to complete trips within walking distance due to barriers to accessibility beyond the roadway. Therefore, it is anticipated that implementation of the WSAP would reduce VMT per capita by providing individuals with safe, efficient, alternative modes of transportation. Although VMT per capita would be reduced as a result of the proposed Project, with Mitigation Measures T-1 and T-2, the impact related to VMT per service population will remain significant and unavoidable.

**Impact 5.17-3: 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)? [Threshold T-3]**

**Less Than Significant Impact.** As described above, several collision corridors identified in the County's VisionZero Plan are within the Planning Area. The proposed WSAP includes several policies related to improving safety for vehicles, pedestrians, and bicyclists as well as other traffic safety features to support safe, accessible, and sustainable multimodal transportation and transit throughout the Planning Area (WSAP Policies M 1.2, M 1.6, M 2.1, M 2.3, M 3.1, and M 4.10). Therefore, while buildout of the WSAP would result in improvements to the circulation network, potential hazards due to roadway design features or incompatible uses will be evaluated on a project-by-project basis as the buildout occurs with individual development projects. All new highways and upgrades will be planned, designed, and built to County standards in accordance with the goals of the proposed Mobility Element as well as design guidelines in the California Manual of Uniform Traffic Control Devices and the Caltrans Roadway Design Manual. The County monitors traffic accident patterns and physical conditions of the existing street system and applies consistent standards throughout the Highway Plan for street design to promote travel safety. These County standards would continue to apply to

the roadways in the Planning Area. Additionally, the CTSP for the Ladera Heights, View Park, and Windsor Hills communities addresses the transportation safety concerns for the area and provides recommendations to promote traffic safety. Therefore, implementation of the WSAP would not result in hazards due to design features or incompatible uses, and impacts would be less than significant and no mitigation is required.

**Impact 5.17-4: Would the Project result in inadequate emergency access? [Threshold T-4]**

**Less Than Significant Impact.** The proposed Project does not propose any direct development or new roadways and it does not include any standards that would result in inadequate emergency access. Therefore, the Draft PEIR does not consider impacts to emergency access to properties in the Planning Area or particular streets along which areas are identified for development. However, the proposed Project would allow for greater densities than are currently allowed within the Planning Area and would facilitate temporary construction activities within the Planning Area, which could temporarily result in impacts to the circulation system.

Any construction activities facilitated as a result of the proposed Project that could potentially impact adjacent street and roadways and thereby interfere with emergency access would be subject to the County's Traffic Control Requirements (Los Angeles County 2016). The Traffic Control Requirements provide requirements for temporary traffic controls and access for any permitted activity within the County public rights-of-way when temporary disruption of traffic is implemented. This would include mandatory compliance with the latest California Manual of Uniform Traffic Control Devices as well as the provision that emergency access to all nearby properties shall be maintained at all times unless the permit allows a temporary restriction. The Traffic Control Requirements also include requirements related to preparation of a Traffic Control Plan; notifications in advance of closing, partially closing, or reopening public throughways, traffic lanes and clearances; and other emergency traffic controls, such as the provision of flagmen, that may also be required pursuant to County Code Section 15.76.170, Flagmen at construction and maintenance areas. Emergency access of individual projects in the Planning Area would be subject to review by the County and responsible emergency service agencies, including the Los Angeles County Fire Department, pursuant to Title 9 and Title 32 of the County Code. This would ensure that each project is designed to meet all emergency access and design standards based on the size and intensity of development. Any changes proposed to internal circulation and/or external circulation associated with the implementation of individual projects would be subject to review by the Couty and responsible emergency service agencies. This would ensure that the proposed Project would be designed to meet all applicable emergency access and design standards, and adequate emergency access would be provided. Therefore, implementation of the WSAP would not result in inadequate emergency access and impacts would be less than significant.

## 5.17.4 Cumulative Impacts

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impacts is "cumulatively considerable.". The cumulative study area used to assess potential cumulative transportation impacts includes the entire Westside Planning Area (both unincorporated communities and incorporated cities). Specifically, the cumulative impact analysis involves comparing the cumulative "no project" scenario,

representing RTP/SCS cumulative year conditions, to the cumulative "plus project" scenario, representing reallocation of the population/employment growth associated with the proposed Project.

**Impact 5.17-5: Would the project, when combined with other past, present, or reasonably foreseeable projects, conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? [Threshold T-1]**

**Less Than Significant Impact.** As described above, the proposed Project would be consistent with all applicable regulations addressing the circulation system. All future projects implemented within the Planning Area would be subject to an analysis for consistency with applicable programs, plans, policies, and ordinances related to the circulation system, including the goals and policies identified in the WSAP that would advance State, regional, and local goals related to increased safety, access, transit, and active transportation. Therefore, the WSAP would not contribute to a cumulative impact with respect to consistency with programs, plans, policies, and ordinances. Cumulative impacts are considered less than significant.

**Impact 5.17-6: Would the project, when combined with other past, present, or reasonably foreseeable projects, conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? [Threshold T-2]**

**Significant and Unavoidable Impact.** The geographic scope for traffic includes cumulative growth projections for Los Angeles County that are reflected in the SCAG RTP/SCS. The WSAP buildout scenario demonstrates a project impact after applying an efficiency based VMT threshold in the Project VMT Impacts section. Although it is consistent with SCAG RTP/SCS in network and zoning, it reallocates population/employment growth and reflects a greater amount of service population overall than is assumed in the SCAG RTP/SCS in the area, and therefore requires cumulative impact analysis. The cumulative impact analysis entails comparing the cumulative "no project" scenario, representing RTP/SCS cumulative year conditions, to the cumulative "plus project" scenario, representing reallocation of the population/employment growth associated with the WSAP to the area.

As shown in Table 5.17-7, *WSAP Cumulative VMT Summary*, the daily VMT per service population is slightly lower, but total VMT is higher under the 2045 Plus Project conditions than the 2045 No Project conditions. This indicates a significant impact under cumulative conditions.

**Table 5.17-7 WSAP Cumulative VMT Summary**

| | 2045 "No Project" Conditions | 2045 Plus Project (WSAP) Conditions | Net Difference | Percent Difference |
|---|---|---|---|---|
| Total Daily VMT | 56,287,506 | 56,528,221 | 240,715 | 0.4% |
| Total Service Population | 2,190,143 | 2,206,457 | 16,314 | 0.7% |
| Total Daily VMT per Service Population | 25.7 | 25.6 | -0.1 | -0.3% |

Source: F&P 2024a.

While the proposed Project may result in cumulatively considerable significant impacts to VMT per service population, the cumulative impact of the proposed Project traffic along with other regional growth would be reduced through Mitigation Measures T-1 and T-2, along with regional programs that are the responsibility of other agencies, such as cities within the Planning Area and Caltrans. In addition, as described above, the goals and policies of the proposed Project would result in a decrease in VMT per capita by prioritizing transit-oriented development, mixed use development, and safe and accessible multi-modal transportation circulation improvements. Future plans and programs implemented by cities in the Planning Area would also be subject to the State and regional policies that encourage or require similar improvements and reductions in VMT per capita and per service population. However, if these programs and policies are not implemented by the agencies with the responsibility to do so, the cumulative transportation and traffic impacts would remain significant and unavoidable. Under these circumstances, the proposed Project could result in a cumulatively significant traffic impact that may remain significant and unavoidable.

**Impact 5.17-7: Would the project, when combined with other past, present, or reasonably foreseeable projects, substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? [Threshold T-3]**

**Less Than Significant Impact.** As described above, the WSAP includes several policies related to improving safety for vehicles, pedestrians, and bicyclists as well as other traffic safety features to support safe, accessible, and sustainable multi-modal transportation and transit throughout the Planning Area (WSAP Policies M 1.2, M 1.6, M 2.1, M 2.3, M 3.1, and M 4.10). In addition, the proposed Land Use Element does not identify any incompatible uses that would result in transportation hazards. Therefore, the proposed Project would not contribute to a cumulatively considerable impacts related to hazards. In addition, all future projects implemented by the County or other State, regional, or local agencies within the Planning Area would be reviewed to ensure compliance with the County's standards or other applicable standards relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Cumulative impacts are considered less than significant.

**Impact 5.17-8: Would the project, when combined with other past, present, or reasonably foreseeable projects, result in inadequate emergency access. [Threshold T-4]**

**Less Than Significant Impact.** Emergency access would be evaluated on a project-by-project basis as the buildout of the WSAP occurs. All future development in the Planning Area would be required to comply with all applicable local and State provisions related to the circulation system and emergency access. Compliance with existing regulations would be ensured through the County's development plan review process, pursuant to Title 9 and Title 32 of the Los Angeles County Code. Applicable local and State provisions would apply to transit facility improvements and other construction activities (including those encroaching upon the public rights-of-way) and would ensure public and emergency access and safety for all road users, including pedestrian and bicyclists. Cumulative impacts are considered less than significant.

## 5.17.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.17-1, 5.17-3, and 5.17-4.

Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.17-2** Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

## 5.17.6 Mitigation Measures

### Impact 5.17-2

T-1 **VMT Reduction Projects.** The County shall continue to work with State, regional, and local agencies to reduce regional VMT. Land use policies in the WSAP that improve and/or expand transit service, bicycle and pedestrian facilities, and transportation projects will help the region to achieve the projected decreases in regional VMT. The County will also collaborate with State and other agencies to explore the feasibility of new programs for reducing VMT, such as VMT fees.

T-2 **TDM Strategies.** For future development projects facilitated by the WSAP, applicants shall implement TDM strategies, where feasible and necessary based on project- and site-specific considerations. Potential VMT reduction measures may include but are not limited to those identified below:

1. Implement Commute Trip Reduction Marketing
2. Provide Ridesharing Program
3. Implement Subsidized or Discounted Transit Program
4. Provide End-of-Trip Bicycle Facilities
5. Provide Employer-Sponsored Vanpool
6. Limit Residential Parking Supply
7. Unbundle Residential Parking Costs from Property Cost
8. Implement Transit-Supportive Roadway Treatments

The TDM strategies listed above are described in detail in Appendix E to this Draft PEIR.

## 5.17.7 Level of Significance After Mitigation

Due to development facilitated by implementation of the WSAP, increase in service population anticipated from buildout in the 2045 with Project scenario, and land uses within the Planning Area compared to the Countywide average, the proposed Project would result in significant and unavoidable impacts related to

increases in VMT at the project level and cumulatively after implementation of Mitigation Measures T-1 and T-2. The implementation of these mitigation measure would reduce impacts related to VMT but would not result in a reduction of Planning Area VMT per capita below the County's significant threshold of 16.8 percent below existing conditions. Mitigation Measure T-1 requires the County to ensure implementation of the WSAP's policies related to VMT reduction and to work with State, regional, and local agencies for implementation of those policies as well as potential future VMT mitigation strategies. Mitigation Measure T-2 requires implementing agencies and project sponsors to incorporate TDM strategies in all future projects, when feasible, based on project- and site-specific considerations to reduce regional VMT.

## 5.17.8 References

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# 5.18 TRIBAL CULTURAL RESOURCES

This section identifies and evaluates issues related to tribal cultural resources to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period. Issues relating to tribal cultural resources raised in comments are addressed in this section.

Information in this discussion is provided from:

- *Historic Context Statement*, Los Angeles County Westside Area Plan, Historic Resources Group, 2024.

## 5.18.1 Environmental Setting

### 5.18.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *American Indian Religious Freedom Act of 1978*

The American Indian Religious Freedom Act of 1978 (42 U.S.C. Section 1996) makes it the policy of the United States to "protect and preserve for the American Indians their inherent right to freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians." These rights include, but are not limited to, access to sites, use and possession of sacred objects, and the freedom to worship through ceremony and traditional rites.

##### *Executive Order 13007*

Executive Order 13007, Indian Sacred Sites, was issued by President Clinton on May 24, 1996. The order requires federal land managing agencies to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and to avoid adversely affecting the physical integrity of such sacred sites. It also requires federal agencies to develop procedures for reasonable notification of proposed actions or land management policies that may restrict access to or ceremonial use of, or adversely affect, sacred sites. Under the order, sacred site is defined as "any specific, discrete, narrowly delineated location on federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site."

### *Executive Order 13175*

Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, was issued by President Clinton on November 6, 2000. The order directs federal agencies to establish regular and meaningful consultation and collaboration with tribal officials in the development of rules, policies, and guidance that have tribal implications; to strengthen the United States government-to-government relationships with Indian tribes; and to reduce the imposition of unfunded mandates upon Indian tribes. Several executive memoranda have been issued reinforcing this order. In 2004, President George W. Bush issued a memorandum titled "Government-to-Government Relationship with Tribal Governments" that reaffirmed the existence and durability of the unique government-to-government relationship and commitment to working with federally recognized tribal governments on a government-to-government basis. The 2004 memorandum advocated for all departments and agencies to adhere to these principles and work with tribal governments in a manner that cultivates mutual respect and fosters greater understanding to reinforce these principles. In 2009, President Obama issued a memorandum titled "Memorandum on Tribal Consultation" that sought to improve regular and meaningful consultation and collaboration with tribal officials. The memorandum directed agencies to submit detailed plans of action to implement the policies and directives of EO 13175 and to provide annual reports regarding the implementation of the plans along with recommendations for improving the plans and tribal consultation process. In 2021, President Biden issued a memorandum titled "Tribal Consultation and Strengthening Nation-to-Nation Relationships," reaffirming the policies in President Obama's 2009 memorandum.

## State Laws, Regulations, and Policies

### *California State Assembly Bill 52*

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added Public Resources Code (PRC) Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources (TCR) must be considered under the California Environmental Quality Act (CEQA) and provided additional Native American consultation requirements for the lead agency. PRC Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; 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.

AB 52 formalizes the lead agency–tribal consultation process. Specifically, it requires the lead agency to notify a California Native American tribe of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe if that tribe has requested such notification, in writing, to the lead agency (PRC Section 21080.3.1[b]). Additionally, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report, the lead agency is required to begin consultation with a California Native American tribe that requested consultation within 30 days of receipt of project notification (PRC Section

21080.3.1[e]). PRC Section 21084.2 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." Effects on TCRs should be considered under CEQA. PRC Section 21080.3.2 states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

### *Senate Bill 18*

The Local and Tribal Intergovernmental Consultation process, commonly known as Senate Bill (SB) 18, was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Section 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).

- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation. In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to "allow the protection of cultural places in open space element of the general plan" and amended Civil Code Section 815.3 to add "California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places."

### *California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98*

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner

determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the "most likely descendant." With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

## Local Laws, Regulations, and Policies

### *Los Angeles County General Plan*

The Conservation and Natural Resources Element of the County General Plan (General Plan) provides the following goals and policies potentially relevant to the Project (DRP 2015):

**Goal C/NR 14:** Protected historic, cultural, and paleontological resources.

- **Policy C/NR 14.1.** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- **Policy C/NR 14.2.** Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- **Policy C/NR 14.4.** Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).
- **Policy C/NR 14.5.** Promote public awareness of historic, cultural, and paleontological resources.
- **Policy C/NR 14.6.** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

### *Los Angeles Countywide Parks and Recreation Needs Assessments*

#### *2022 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment Plus*

On December 6, 2022, the Los Angeles County Board of Supervisors adopted the 2022 Parks Needs Assessment Plus (PNA+). The PNA+ is a national model for park equity and planning that assesses the County's needs with respect to environmental conservation and restoration, regional recreation, and rural recreation. The PNA+ builds on the Los Angeles Countywide Parks and Recreation Needs Assessment (PNA) of 2016, which comprehensively analyzes and quantifies the need for parks and recreational facilities in cities and unincorporated areas. It identifies priority areas for environmental conservation and restoration, forming the basis of the County's strategy to conserve at least 30 percent of lands and waters by 2030 (30x30). It also identifies priority areas for regional recreation and rural recreation using various indicators of population vulnerability and other factors such as access to regional and rural recreation sites via different modes of travel, the availability of such facilities, and the amenities they offer. Goals of the PNA+ specific to tribal cultural resources include:

Formalize partnerships with Native American tribes and groups to pursue opportunities for acknowledgement and stewardship of land. As part of various County planning processes, including those for the OurCounty Sustainability Plan and the PNA+, Native American residents and stakeholders identified numerous barriers to accessing County-owned land for cultural, religious, and traditional practices such as harvesting and gathering on ancestral lands. DPR and partner agencies should continue to collaborate with the Los Angeles City/County Native American Indian Commission (NAIC) and Native American tribes, indigenous-led organizations, and other indigenous stakeholders to remove barriers to the observance of cultural, religious, and traditional practices and explore partnerships for the co-management of lands.

### 5.18.1.2 EXISTING CONDITIONS

The Westside Planning Area (Planning Area) is part of Los Angeles County (County), which comprises more than four thousand square miles. Los Angeles County is the approximate ancestral territory of the Tongva, Tataviam, Serrano, Kizh, and Chumash Peoples. There are no known extant built resources in the Planning Area dating from the pre-colonial period (before 1542).

#### Native American Tribes

For more than 7,000 years, the Planning Area's First Peoples have served as the traditional caretakers of the Los Angeles Basin, South Channel Islands, San Gabriel and Pomona Valleys, and portions of Orange, San Bernardino, and Riverside Counties. Historically, the present-day tribes listed above were not a single tribe, but a collection of lineages (a group of families with a common ancestor) that shared a common Uto-Aztecan language, culture, religion, and lifestyle that distinguished them from neighboring groups. This group did not have a single unifying name, and it was common for a tribe to refer to themselves in their own language simply as "people" or "men," although they likely would have assigned names to other tribes. Villages were politically autonomous and largely organized through shared kinship ties.

The arrival of Spanish explorers in the 1760s ushered in a period during which Native Americans were subjugated to Spanish rule, targets of religious conversion to Catholicism, and enslaved to build and maintain the missions, pueblos, and presidios. Tribes were forced to move from their villages and subjected to violence and cultural genocide. Tribes were named after the missions they were forced into, reflected in the names of many local tribes today.

The Spanish settlers who colonized the area and developed the Mission San Gabriel Arcángel (San Gabriel Mission) assigned the name "Gabrieleño" to Native Americans associated with the Mission. Tongva, Kizh, and some members of the Cahuilla and Serrano tribes were historically encompassed under this nomenclature. Anthropologists Lowell John Bean and Charles R. Smith note that the term "Gabrieleño" first appeared in a report published by Oscar Loew in 1876 and has been intermittently applied to the Indigenous population of the Los Angeles area ever since. Today, some descendants refer to themselves as either Tongva or Kizh because they are terms of Native rather than Spanish origin.

The Planning Area, specifically, was and is still inhabited and cared for by Native Americans. The present-day local tribal governments with ancestral ties to this area include, in alphabetical order:

- Gabrieleño Band of Mission Indians–Kizh Nation

- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino Tongva Tribe

Prior to European contact and colonization, Native Americans in what is now the Planning Area thrived because of their relationship with the land and waters and their stewardship approach to land conservation. Archeological research indicates that habitation sites were hierarchically organized around estuaries, with settlement size depending on resource availability. Though some larger estuaries could support large settlements, populations at smaller estuaries often practiced a strategy of mobility in which a part of the population foraged during resource scarcity. Research on the remains of flora and fauna from the Playa Vista/Ballona Creek area find that local estuarine, coastal, and near-coast resources provided subsistence for people residing near the estuaries. Fishing was mostly limited to near-shore environments, with little deep-sea fishing.

While it is difficult to estimate their population over time, evidence suggests that at the time of European contact in the 16th century there may have been more than fifty to one hundred mainland villages with a range in sizes. Each village was headed by a chief, who was usually descended from the prevailing lineage of the village. The chief typically spoke multiple languages, negotiated social relations, collected taxes, and directed the community's seasonal migrations. In addition to the chief, spiritual leaders also had authority over the tribal community.

Surrounding Indigenous communities included the Chumash, the Tataviam, the Serrano, the Cahuilla, and the Luiseño. Interactions with surrounding groups were frequent and generally peaceful, occurring largely through the channels of intermarriage, matrilocal residence, and/or trade. It appears that the Planning Area's First Peoples also shared some rituals with the Chumash to the north, based on the distribution of similar stone effigies in the prehistoric period. With the possible exception of the Chumash, the Planning Area's First Peoples were the most populous, and most powerful ethnic nationality in aboriginal Southern California, their influence spreading as far north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California. Their territory spanned several ecological zones. Consequently, the group's settlement and subsistence patterns varied slightly within each zone based on micro-environmental conditions, but on the whole, they thrived on hunting, gathering, and fishing activities.

The first European expedition landed on Catalina Island in 1542, home to the Tongva, and made the first recorded contact between the Spanish people and the Native people of modern-day Los Angeles County. The Spanish returned in 1769 to colonize the present-day Los Angeles area. Local tribes were forcibly displaced from their villages, eroding their language and culture. The Spanish enslaved the Native Americans, forcing them to build and maintain their missions, pueblos, and presidios; they were subjected to a life of servitude, and in many cases, forced religious conversion.

Successive waves of settlers—the Spanish, the Mexicans and the Americans—resulted in the loss of title(s) to their ancestral lands as well as disenfranchisement of the Native Americans. Spanish colonization of land was governed by the "Recopilación de Leyes de los Reynos de las Indias," of 1680, which provided that the

inhabitants of colonized land included "the rights to their possessions, the right to as much land as they needed for their habitations, for tillage and for the pasturage of flocks." Under the law, the Spanish held land in trust for the Native Americans. While the Native Americans retained the land, water and mineral rights living in and around the missions, these laws did not cover those living in traditional village settlements.

### Native American Consultation

On November 16, 2023, the County submitted notification and request-to-consult letters to 17 individuals and organizations pursuant to AB 52 and State Bill (SB) 18:

- Julio Quair, Chumash Council of Bakersfield
- Gabe Frausto, Coastal Band of Chumash Nation
- Patrick Tumamait, Band of Mission Indians
- Sarah Brunzell, Fernandeño Tataviam Band of Mission Indians
- Barbeno/Ventureno Band of Mission Indians
- Sandonne Goad, Gabrielino/Tongva Nation
- Sam Dunlap, Gabrielino-Tongva Tribe
- Anthony Morales, Gabrieleño Tongva San Gabriel Band of Mission Indians
- Andrew Salas, Gabrieleño Band of Mission Indians-Kizh Nation
- Violet Walker, Northern Chumash Tribal Council
- Donna Yocum, San Fernando Band of Mission Indians
- Lee Clauss, San Manuel Band of Mission Indians
- Lovina Redner, Santa Rosa Band of Cahuilla Indians
- Nakia Zavalla, Santa Ynez Band of Chumash Indians
- Joseph Ontiveros, Soboba Band of Luiseno Indians
- Tejon Indian Tribe
- Christina Conley, The Gabrielino Tongva Indians of California

Two responses were received from the individuals/organization pursuant to AB 52 and SB 18. The Fernandeño Tataviam Band of Mission Indians did not request consultation because the proposed Project is outside the ancestral territory of the tribe. The Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) did not request consultation because the proposed Project is outside the ancestral territory of the tribe.

## 5.18.2 Thresholds of Significance

According to Appendix G and of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

## 5.18.3 Environmental Impacts

### 5.18.3.1 METHODOLOGY

Adoption of the WSAP would not cause adverse impacts to tribal cultural resources; however, future projects facilitated by the WSAP have the potential to result in adverse impacts. Impacts to tribal cultural resources that may result from the WSAP are evaluated at a programmatic level. The analysis is informed by the results of the County's AB 52 and SB 18 consultations with local Native American individuals and organizations. Of the 17 individuals/organizations notified, two responded stating no request for consultation.

In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP would comply with relevant federal, State, and local laws, ordinances, and regulations.

#### Tribal Cultural Resources Definition

Tribal cultural resources, as defined in Public Resources Code Section 21074, include "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

### 5.18.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

Goals and policies related to protecting cultural resources are identified in Draft PEIR Section 5.5, *Cultural Resources*.

### 5.18.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.18-1: The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). [Threshold TCR-1.i]**

**Impact 5.18-2: The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c). [Threshold TCR-1.ii]**

**Less Than Significant Impact with Mitigation Incorporated.** No tribal cultural resources listed or eligible for listing in the California Register of Historical resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) were identified in the Planning Area.

The WSAP is a policy document that does not include proposals for approval of any specific projects; therefore, the proposed Project would not result in impacts to tribal cultural resources. However, future projects facilitating land use/zoning changes and policies in the WSAP have the potential to involve ground-disturbing activities (for construction of residential and mixed-use development) that could, depending on their location, result in direct or indirect substantial adverse changes to the significance of tribal cultural resources. Future projects facilitated by the WSAP would be required to comply with applicable federal, State, and local regulations and, as appropriate, to undergo the County's discretionary review process, including completion of subsequent project-level planning and environmental review under CEQA. These projects would similarly require compliance with AB 52 to ensure that tribal cultural resources are properly identified. Such projects could nonetheless result in significant impacts to sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe qualifying as tribal cultural resources. Thus, there would be a significant impact to tribal cultural resources.

However, implementation of mitigation measures CUL-2 through CUL-6 in Chapter 5.5, *Cultural Resources*, would reduce impacts to tribal cultural resources, including archaeological resources that could also meet the definition of tribal cultural resource, less than significant levels.

## 5.18.4 Cumulative Impacts

For the purposes of this analysis of cumulative impacts to tribal cultural resources, the geographic area of consideration (i.e., the cumulative impacts study area) consists of the unincorporated islands and communities within the Planning Area and adjacent cities. This geographic scope of analysis is appropriate for the analysis of tribal cultural resources because the types of resources within this area are similar in nature and origin, and share a common heritage. Cumulative impacts could result at various locations within this area from the initiation of projects facilitated by the WSAP and could be perpetual.

**Impact 5.18-3: Would the Project when combined with other past, present, or reasonably foreseeable projects, 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, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k); or**

**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 Public Resources Code § 5024.1(c). In applying the criteria set forth in Public Resources Code § 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe?**

**Less Than Significant Impact with Mitigation Incorporated.** No tribal cultural resources listed or eligible for listing in the California Register or in a local register of historical resources were identified in the Planning Area. However, given the Planning Area's long history, the combined incremental impacts of past, present, and reasonably foreseeable future projects, have the potential to (in combination with projects facilitated by the proposed Project) have a substantial adverse change on tribal cultural resources throughout the County. Cumulative finds of tribal cultural resources could cause or contribute to a significant cumulative impact.

The proposed Project, because of projects facilitated by WSAP, has the potential to contribute a significant incremental contribution to this significant cumulative impact; however, this impact could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of mitigation measures CUL-2 through CUL-6 because they would require identification and treatment of tribal cultural resources and thereby avoid or reduce significant impacts. With the implementation of these mitigation measures, a less than significant cumulative impact to tribal cultural resources would result.

## 5.18.5 Level of Significance Before Mitigation

Without mitigation, the following impacts would be **potentially significant:**

- **Impact 5.18-1.i** Direct or indirect impacts resulting from future implementing projects may impact tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
- **Impact 5.18-1.ii** Direct or indirect impacts resulting from future implementing projects may impact tribal cultural resource that are determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c).

## 5.18.6 Mitigation Measures

Mitigation measures CUL-2 through CUL-6 shall apply (see Draft PEIR Section 5.5, *Cultural Resources*).

## 5.18.7 Level of Significance After Mitigation

The WSAP would result in less than significant impacts to tribal cultural resources after implementation of mitigation measures CUL-2 through CUL-6 (see Draft PEIR Section 5.5, *Cultural Resources*), which require, among other things, archaeological monitoring and Native American coordination, and preparation of a plan for the treatment of archaeological resources, including those that may also qualify as tribal cultural resources, which would further reduce the impact.

## 5.18.8 References

DPR (County of Los Angeles Department of Regional Planning). 2015 (Updated July 14, 2022). Los Angeles County General Plan 2035. https://planning.lacounty.gov/wp-content/uploads/2023/03/gp_final-general-plan.pdf.

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# 5. Environmental Analysis
## TRIBAL CULTURAL RESOURCES

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# 5.19 UTILITIES AND SERVICE SYSTEMS

This section identifies and evaluates issues related to utilities and service systems to determine whether implementation of the Westside Area Plan (proposed Project or WSAP) could result in a significant impact related to water supply; wastewater treatment; stormwater drainage; electric power, natural gas, or telecommunication facilities; or solid waste. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Impact Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of all comments received during the scoping comment period. Comments received during scoping relating to utilities and service systems were considered in preparation of this section.

## 5.19.1 Environmental Setting

### 5.19.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *Safe Drinking Water Act*

The United States Environmental Protection Agency (EPA) administers the Safe Drinking Water Act, which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The State Department of Health Services implements the requirements of the act, oversees public water system quality statewide, and establishes legal drinking water standards for contaminants that could threaten public health.

##### *Clean Water Act*

The Clean Water Act (CWA) is the cornerstone of surface water quality protection in the United States. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. In Los Angeles County, the State Water Resources Control Board and the Los Angeles Regional Water Quality Control Board (RWQCB) are responsible for ensuring implementation and compliance with the provisions of the federal CWA. In 1972, the CWA was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendments to the CWA added Section 402(p),

which establishes a framework for regulating municipal and industrial stormwater discharges, including discharges associated with construction activities, under the NPDES program.

## State Laws, Regulations, and Policies

### *State Water Resources Control Board*

The State Water Resources Control Board was created by the California Legislature in 1967 with the mission of ensuring the highest reasonable quality for waters of the state while allocating those waters to achieve the optimum balance of beneficial uses. The State Water Resources Control Board has authority over water allocation by administering and regulating appropriative water right permits and licenses, as per the Water Code, which require that all uses of water be "reasonable and beneficial," which includes municipal and industrial uses, irrigation, hydroelectric generation, and livestock watering. In 1970, the Porter-Cologne Water Quality Control Act created nine RWQCBs that develop and enforce water quality objectives of the state and implementation plans within their regions. The RWQCBs oversee various programs that protect surface water and groundwater quality, and enforce the federal NPDES Wastewater Program and NPDES Storm Water Program. The RWQCBs are also responsible for developing and implementing total maximum daily loads for impaired water bodies.

### *Porter-Cologne Water Quality Control Act*

In California, the State Water Resources Control Board and nine RWQCBs are responsible for implementing the Clean Water Act and the California Porter-Cologne Water Quality Control Act. The Porter-Cologne Act authorizes the State Water Resources Control Board to implement programs to control polluted discharges into state waters. In compliance with the Porter-Cologne Act, the nine RWQCBs establish the wastewater concentration limits of a number of specific hazardous substances in treated wastewater discharge.

### *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, Sections 10610–10656) requires that every urban water supplier that annually serves 3,000 or more customers or provides more than 3,000 acre-feet (af) 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 five 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.

### *Sustainable Groundwater Management Act*

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package—AB 1739 (Dickinson), Senate Bill (SB) 1168 (Pavley), and SB 1319 (Pavley)—collectively known as the Sustainable

Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically overdrafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies to manage basins sustainably, and requires the Groundwater Sustainability Agencies to adopt Groundwater Sustainability Plans for crucial groundwater basins in California.

### *Assembly Bill 939*

AB 939 (the Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) requires local agencies to create waste management practices that focus on source reduction, recycling and composting, and environmentally safe land disposal. Assembly Bill 939 also requires counties to provide a 15-year solid waste disposal plan, reflecting sufficient disposal capacity for all jurisdictions. To further the goals of AB 939, statewide strategies to achieve a statewide goal of diverting 75 percent of solid waste from landfills by 2020 were established with the adoption of AB 341 in May 2012. As stated in the legislative text of AB 341, it is the policy goal of the State that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter (Public Resources Code Section 41780.01[a]).

### *California Green Building Standards Code*

Section 5.408 of the California Green Building Standards Code (Title 24, California Code of Regulations, Part 11) requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

### *Senate Bill 244*

SB 244 (2011) requires that for each identified disadvantaged community, water service, storm drain, sewer service, and structural fire protection needs or deficiencies must be addressed.

### *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. 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.

### *Public Resources Code Sections 41813 and 41850(a)*

CalRecycle has statutory requirements under Public Resources Code Sections 41813 and 41850(a) to enforce the provisions of AB 939 if a local jurisdiction fails to submit an adequate element or plan or if a local

jurisdiction fails to implement its Source Reduction and Recycling Element or Household Hazardous Waste Element. Administrative civil penalties of up to $10,000 per day may be imposed on local jurisdictions until the element or plan is submitted to CalRecycle and is deemed adequate or until the element or plan is implemented.

## Regional Laws, Regulations, and Policies

### *Regional Municipal Separate Storm Sewer System (MS4) Permits*

The County of Los Angeles is a co-permittee under the NPDES stormwater permit covering Los Angeles County (NPDES No. CAS614001). The Los Angeles RWQCB completed a revision of the NPDES permit for the Los Angeles region in 1996 and 2001. The MS4 Permit requires permittees to reduce the discharge of storm water pollutants to the maximum extent practicable and ensure MS4 discharges do not cause or contribute to violations of water quality standards. The MS4 Permit also requires implementation of various site design best management practices (BMP) and treatment control BMPs to reduce the possibility of pollutants stored or produced on-site from entering surface water or sewer system.

### *Regional Water Quality Control Board*

Each RWQCB is required to develop, adopt, and implement a Basin Plan for its respective region. The Basin Plan is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in each region. Basin Plans identify beneficial uses of surface waters and groundwater within the corresponding region; specify water quality standards, known as water quality objectives, for both surface water and groundwater; and develop the actions necessary to maintain the standards to control nonpoint and point sources of pollutants to the state's waters. All discretionary projects requiring permits from the RWQCB (i.e., waste and pollutant discharge permits) must implement Basin Plan requirements (i.e., water quality standards), taking into consideration the beneficial uses to be protected. The Planning Area is within the jurisdiction of Los Angeles RWQCB, and the proposed WSAP is subject to the Los Angeles RWQCB's Water Quality Control Plan.

### *Regional Growth Management Policies: Southern California Association of Governments*

SCAG is recognized by the state and federal governments as the regional planning agency for the six-county south coast region that includes Los Angeles County. The SCAG Regional Growth Forecast is used as a key guide for developing regional plans and strategies mandated by federal and state governments such as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Program Environmental Impact Report for the RTP/SCS, the Air Quality Management Plan, the Federal Transportation Improvement Program, and the Regional Housing Needs Assessment. The RTP/SCS provides detailed growth forecasts by city and county and for the unincorporated area (SCAG 2024).

## Local Laws, Regulations, and Policies

### *Los Angeles County Integrated Waste Management Plan*

The California Integrated Waste Management Act of 1989 (AB 939) requires that the responsibility for solid waste management be shared between state and local governments. The State of California has directed the

County to prepare and implement a local integrated waste management plan in accordance with AB 939. The Los Angeles County Integrated Waste Management Plan Executive Summary presents the County-wide goals and objectives for integrated solid waste management and describes the County's system of governmental solid waste management infrastructure and the current system of solid waste management in the cities and unincorporated areas of the county. This document also summarizes the types of programs planned for individual jurisdictions and describes countywide programs that could be consolidated.

### *Construction and Demolition Debris Recycling and Reuse Ordinance*

The County Board of Supervisors adopted the Construction and Demolition Debris Recycling and Reuse Ordinance on January 4, 2005. The ordinance added Chapter 20.87 to the County Code and requires projects in the unincorporated areas to recycle or reuse 50 percent of the debris generated. Its purpose is to increase the diversion of construction and demolition debris from disposal facilities and will assist the County in meeting the State of California's 50 percent waste reduction mandate.

### *Mandatory Organic Waste Disposal Reduction Ordinance*

On November 16, 2021, the County Board of Supervisors adopted the Mandatory Organic Waste Disposal Reduction Ordinance. The ordinance ensures everyone does their part in diverting organic waste and edible food from landfills to reduce emissions of methane and the impacts on climate change. The ordinance is also required per SB 1383 regulations.

### *County of Los Angeles Department of Public Works Low Impact Development Standards Manual*

The County prepared the 2014 Low Impact Development Standards Manual (LID Standards Manual) to comply 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 (CAS004001, Order No. R4-2012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the county with the intention of improving water quality and mitigating potential water quality impacts from stormwater and nonstorm water discharges. All designated, nondesignated, street and road construction, and single-family hillside home projects within the unincorporated areas of the county are required to comply with the LID Standards Manual.

### *2045 Community Climate Action Plan*

The 2045 Los Angeles County Community Climate Action Plan (2045 CAP), which is planned for adoption by the Los Angeles County Board of Supervisors (Board) in April 2024, identifies strategies, measures, and actions to reduce GHG emissions from community activities (Los Angeles 2024). The 2045 CAP is LA County's path to meeting the goals of the Paris Agreement and achieving carbon neutrality for unincorporated areas of the county. It builds on previous climate action work from the Unincorporated Los Angeles County Community Climate Action Plan 2020 (2020 CCAP) and includes a GHG emissions inventory from community-wide activities in unincorporated Los Angeles County in 2018 and a baseline inventory for 2015. The 2045 CAP also includes projections of future emissions for 2030, 2035, and 2045 as well as targets to reduce GHG emissions

by 40 percent below 2015 levels by 2030 and 50 percent below 2015 levels by 2035. In addition to these targets, the 2045 CAP provides climate strategies, measures, and actions to reduce GHG emissions as well as implementation and monitoring measures to ensure successful climate action.

The 2045 CAP includes Measure E1 (Decarbonize Existing Buildings). Measure E1 is not a ban on the use of natural gas but a pathway to bring carbon-free options into existing buildings. This will be done through developing and adopting Building Performance Standards to reach code requirements that will guide when and where the transition is appropriate.

Building Performance Standards establish targets for buildings to reduce energy use or GHG emissions over time, and a reach code is a local building energy code that goes beyond the State's minimum requirements for energy use or GHG emissions. Measure E1 also includes the utilization of alternatives to fossil natural gas to expand opportunities for alternative renewable energy sources. While electricity is currently the most common alternative, other zero-GHG emission fuel sources will be considered for existing buildings.

Measure E2 (Decarbonize New Development), which aims to decarbonize all applicable new development, does not prohibit the use of natural gas. While the goal of Measure E2 is decarbonization, there will be some consideration for varying climate, geography, infrastructure, and sole-source dependency challenges that rural communities and unique industries may face and where decarbonization may be difficult to achieve.

### *Los Angeles County General Plan*

#### *Public Services and Facilities Element*

The following goals and policies from the General Plan are applicable to utilities and service systems.

**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.
- **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 1.3.** Ensure coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 1.4.** Ensure the adequate maintenance of infrastructure.
- **Policy PS/F 1.5.** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- **Policy PS/F 1.6.** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- **Policy PS/F 1.7.** Consider resource preservation in the planning of public facilities.

**Goal PS/F 2:** Increased water conservation efforts.

- **Policy PS/F 2.1.** Support water conservation measures.
- **Policy PS/F 2.2.** Support educational outreach efforts that discourage wasteful water consumption.

**Goal PS/F 3:** Increased local water supplies through the use of new technologies.

- **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.
- **Policy PS/F 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.

**Goal PS/F 4:** Reliable sewer and urban runoff conveyance treatment systems.

- **Policy PS/F 4.1.** Encourage the planning and continued development of efficient countywide sewer conveyance treatment systems.
- **Policy PS/F 4.2.** Support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as TODs [Transit Oriented Developments].
- **Policy PS/F 4.3.** Ensure the proper design of sewage treatment and disposal facilities, especially in landslide, hillside, and other hazard areas.
- **Policy PS/F 4.4.** Evaluate the potential for treating stormwater runoff in wastewater management systems or through other similar systems and methods.

**Goal PS/F 5:** Adequate disposal capacity and minimal waste and pollution.

- **Policy PS/F 5.1.** Maintain an efficient, safe and responsive waste management system that reduces waste while protecting the health and safety of the public.
- **Policy PS/F 5.2.** Ensure adequate disposal capacity by providing for environmentally sound and technically feasible development of solid waste management facilities, such as landfills and transfer/processing facilities.
- **Policy PS/F 5.3.** Discourage incompatible land uses near or adjacent to solid waste disposal facilities identified in the Countywide Integrated Waste Management Plan.
- **Policy PS/F 5.4.** Encourage solid waste management facilities that utilize conversion and other alternative technologies and waste to energy facilities.

- **Policy PS/F 5.5.** Reduce the County's waste stream by minimizing waste generation and enhancing diversion.
- **Policy PS/F 5.6.** Encourage the use and procurement of recyclable and biodegradable materials.
- **Policy PS/F 5.7.** Encourage the recycling of construction and demolition debris generated by public and private projects.
- **Policy PS/F 5.8.** Ensure adequate and regular waste and recycling collection services.
- **Policy PS/F 5.9:** Encourage the availability of trash and recyclables containers in new developments, public streets, and large venues.

**Goal PS/F 6:** A County with adequate public utilities.

- **Policy PS/F 6.1.** Ensure efficient and cost-effective utilities that serve existing and future needs.
- **Policy PS/F 6.2.** Improve existing wired and wireless telecommunications infrastructure.
- **Policy PS/F 6.3.** Expand access to wireless technology networks, while minimizing visual impacts through co-location and design
- **Policy PS/F 6.4.** Protect and enhance utility facilities to maintain the safety, reliability, integrity and security of utility services.
- **Policy PS/F 6.5.** Encourage the use of renewable energy sources in utility and telecommunications networks.
- **Policy PS/F 6.6.** Encourage the construction of utilities underground, where feasible.
- **Policy PS/F 6.7.** Discourage above-ground electrical distribution and transmission lines in hazard areas.
- **Policy PS/F 6.8.** Encourage projects that incorporate onsite renewable energy systems.
- **Policy PS/F 6.9.** Support the prohibition of public access within, and the limitation of access in areas adjacent to natural gas storage facilities and oil and gas production and processing facilities to minimize trespass and ensure security.
- **Policy PS/F 6.10.** Encourage utility siting to be localized and decentralized to reduce impacts; reduce transmission losses; promote local conservation by connecting users to their systems more directly; and reduce system malfunctions.

### *Los Angeles County General Plan Implementation Programs*

PS/F-1 Planning Area Capital Improvement Plans: The Department of Regional Planning and Department of Public Works are to jointly secure sources of funding and set priorities for preparing studies to assess

infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, prepare a Capital Improvement Plan (CIP) for each of the 11 Planning Areas (see also Planning Areas Framework Program). Each CIP shall include the following, as needed: Sewer Capacity Study; Transportation; System Capacity Study; Waste Management Study; Stormwater System Study; Public Water; System Study; list of necessary infrastructure improvements; Implementation Program; and Financing Plan. As applicable, studies related to water, sewer, traffic, and stormwater management should specifically address the needs of the unincorporated legacy communities identified in the Land Use Element.

### 5.19.1.2 EXISTING CONDITIONS

#### Stormwater Management

Los Angeles County's stormwater infrastructure includes 3,330 miles of underground storm drains, 82,000 catch basins, 172 debris dams, 483 miles of open channels, and 14 major dams and reservoirs, making the districts' flood protection and water conservation system one of the largest in the world. The Los Angeles County Basin is jointly managed by the Los Angeles County Flood Control District and the U.S Army Corps of Engineers and serves the county's 86 cities. The County's stormwater pollution prevention efforts are designed to protect and improve the quality of recreational waters and potable water resources and beneficial uses of other water resources; to comply with federal, state, and local directives; and to foster a safe and efficient drainage system (LACFD 2022). The Los Angeles County Flood Control District manages flood risk and drainage needs within the Planning Area. The flood district's boundaries encompass 2,752 square miles, 6 major watersheds, and 85 cities.

#### Wastewater Conveyance

Wastewater collection in the Planning Area is provided and maintained by the Consolidated Sewer Maintenance District and the Marina del Rey Sewer Maintenance District, administered by the Los Angeles County Public Works Department. The sewer systems serves over 500,000 parcels and a population of over 2 million people in the unincorporated areas. The sewer systems includes over 4,600 miles of sanitary sewers, 163 pumps stations, and 4 wastewater treatment plants.

#### Wastewater Treatment

Multiple wastewater treatment providers serve the unincorporated areas of the Los Angeles County. Ladera Heights, View Park, and Windsor Hills are within the jurisdictional boundaries of the Los Angeles County Sanitation Districts (Districts), District No. 5. The Districts provide wastewater treatment to many unincorporated areas of Los Angeles County as well as to 78 cities in the county. The Districts' wastewater system consists of approximately 1,400 miles of sewer pipelines, 48 pumping plants, and 11 wastewater treatment plants (Districts 2024a). The system conveys and treats about half of the wastewater produced in Los Angeles County (Districts 2024a). The other half is managed through local municipalities including the City of Los Angeles, and through septic systems. Wastewater treatment is processed at the A.K. Warren Water Resource Facility. Serving a population of approximately 3.5 million people, the Warren Facility treats an average of 260 million gallons per day (mgd) of wastewater and has a total permitted capacity of 400 mgd (Districts 2024b).

The rest of the Planning Area is outside of the sphere of influence of the Districts, as adopted by the Local Agency Formation Commission. These areas are serviced by the West Basin Municipal Water District. Wastewater is recycled at the Edward C. Little Water Recycling Facility where the wastewater is treated through various steps to remove solids and other contaminants until it has reached an environmentally safe level to be suitable for disposal or reuse. The facility produces approximately 40 million gallons of useable water daily, conserving enough drinking water to meet the needs of 80,000 households for a year (West Basin 2022). West Basin's Water Recycling Facility also houses a 60,000-square-foot solar-power-generating system that has reduced emissions of carbon dioxide by over 356 tons in one year's time (West Basin 2022). The treated wastewater is regulated by the Los Angeles County RWQCB.

The Marina Del Rey, Ballona Wetlands, West Fox Hills, and Gilmore Island areas of the Planning Area are in the Los Angeles Department of Water and Power (LADWP) service area, which spans much of the urban areas of Los Angeles County (CEC 2024a). LADWP's water recycling program is dependent on the City of LA's wastewater treatment facilities. The District is responsible for the planning and operation of the City of LA's wastewater treatment infrastructure and wastewater treatment facilities.

### Electricity and Natural Gas Services

Southern California Edison (SCE) provides electricity services to Ladera Heights, View Park, and Windsor Hills; West Los Angeles (Sawtelle VA); and Franklin Canyon in the Planning Area. Electricity is transmitted by a network of aboveground and underground power lines to supply sufficient power to all locations, including streetlights and traffic signals. The SCE service area spans much of southern California, from Orange and Riverside Counties in the south to Santa Barbara County in the west to Mono County the north (SCE 2024a).The LADWP also provides electrical power services to Marina del Rey, Ballona Wetlands, West Fox Hills, and Gilmore Island. Total electricity consumption in LADWP's service area was 23,902 gigawatt-hours in 2022 (CEC 2024b).[1]

SoCalGas provides gas service in Los Angeles County, including to the Planning Area. The service area of SoCalGas spans much of the southern half of California, from Imperial County in the southeast to San Luis Obispo County in the northwest to part of Fresno County in the north to Riverside County and most of San Bernardino County in the east (CEC 2024c). Total natural gas consumption in SoCalGas's service area was 6,566 million therms for 2022 (CEC 2024d). As stated, the existing land uses within the WSAP consist primarily of residential uses and involve a mix of commercial uses, educational uses, office and industrial spaces, and open space that currently generate natural gas demand.

### Water

Water supplies are managed through regional wholesalers and local retailers. The Metropolitan Water District of Southern California provides imported water to Los Angeles County from the State Water Project from the Colorado River Aqueduct and the Sacramento Delta via the California Aqueduct. The City of Los Angeles also imports water from the eastern Sierra via the Los Angeles Aqueduct. Local water wholesalers and retailers are required to prepare UWMPs to identify water demands and supplies for wet years, dry years, and extended

[1] One gigawatt-hour is equivalent to one million kilowatt-hours.

periods of drought. The County has also prepared an Integrated Regional Water Management Plan that provides a regional assessment of supplies and demands. The Planning Area is serviced by the West Basin District and LADWP.

The West Basin District is a wholesale water agency that provides imported drinking water to 17 cities and unincorporated areas of Los Angeles County throughout its 185-square-mile service area. Its supplies include imported water from the Colorado River and Northern California, locally produced recycled water, desalted groundwater, and conserved water. The West Basin District's 2020 UWMP evaluates the region's water resources and future water needs forecast for the year 2045(West Basin 2021). The West Basin District projects that there is sufficient water supply to support the existing and projected population growth in the region during single and multiple dry year scenarios through 2045. Projected water demand and supplies by acre-feet per year (afy) are shown in Table 5.19-1, *West Basin District Projected Water Demand and Supplies*.

The LADWP is sourced primarily by imported sources including the Los Angeles Aqueducts, local groundwater, the State Water Project, and the Colorado River Aqueduct. The LADWP 2020 UWMP outlines general goals and polices which guide the decision-making process to maintain and secure a sustainable water supply and maximize recycled water planning efforts. The LADWP 2020 UWMP evaluated water demand projections through the year 2045. Projected water supplies is influenced by demographics, land use, climate and conservation influence. Project water demands and supplies for single dry year conditions through Fiscal Year (FY) 2045 are shown below in Table 5.19-2, *LADWP Projected Water Demand and Supply for Single Dry Year.*

**Table 5.19-1 West Basin District Projected Water Demand and Supplies (afy)**

| | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 |
|---|---|---|---|---|---|---|
| Groundwater | 20,556 | 25,330 | 30,100 | 30,100 | 30,100 | 30,100 |
| Recycled Water | 13,084 | 20,000 | 29,000 | 39,000 | 44,600 | 44,600 |
| Recycled Water for Retail Use | 14,961 | 30,300 | 31,700 | 31,700 | 31,700 | 31,700 |
| Desalted Groundwater for Retail Use | 124 | 0 | 0 | 0 | 0 | 0 |
| Imported Water | 6,950 | 0 | 0 | 0 | 0 | 0 |
| Imported Water for Retail Use | 105,686 | 95,890 | 89,460 | 89,750 | 89,360 | 89,460 |
| **Total West Basin Supply** | **140,805** | **156,190** | **150,160** | **160,450** | **165,660** | **165,760** |
| **Total Service Area Supply** | **161,361** | **171,520** | **180,260** | **190,550** | **195,760** | **195,860** |
| **West Basin Total Demand** | **141,327** | **151,520** | **151,260** | **151,550** | **151,160** | **151,260** |

**Table 5.19-2 LADWP Projected Water Demand and Supply for Single Dry Year (afy)**

| | 2025 | 2030 | 2035 | 2040 | 2045 |
|---|---|---|---|---|---|
| **Total Water Demand** | **674,700** | **693,200** | **712,700** | **732,700** | **746,000** |
| Conservation | 165,200 | 166,500 | 176,600 | 178,200 | 180,200 |
| Los Angeles Aqueduct | 70,800 | 70,200 | 69,600 | 69,000 | 68,500 |
| Groundwater Entitlements | 121,300 | 121,300 | 121,300 | 120,700 | 120,700 |
| Groundwater Replenishment | 7,000 | 11,000 | 11,000 | 11,000 | 11,000 |
| Stormwater Recharge | 4,000 | 8,000 | 15,000 | 15,000 | 15,000 |
| Recycled Water | 17,300 | 29,200 | 29,700 | 29,800 | 30,000 |
| Metropolitan Water District Water Purchases | 289,100 | 287,000 | 289,500 | 309,000 | 320,600 |
| **Total Supplies** | **674,700** | **693,200** | **712,700** | **732,700** | **746,000** |

### Solid Waste

Los Angeles County Public Works provides commercial solid waste collection services for unincorporated county businesses, multifamily properties (of five units or more), and single-family properties needing dumpster service through three systems: Garbage Disposal Districts, the Non-exclusive Commercial Franchise system, and the new Exclusive Commercial Franchise system. Effective October 1, 2022, the County transitioned most Non-exclusive Commercial Franchise system customers (businesses, multifamily properties with five units or more, and single-family properties needing trash dumpster service) to an Exclusive Commercial Franchise System (DPW 2024). Exclusive Commercial Franchise customers belong to one of eight Exclusive Commercial Franchise Service Areas. Each service area is served by an exclusive waste hauler, and services include collection of trash, recyclables, and organic waste. Organic waste collection service is mandatory under Senate Bill 1383, and new services are required to comply with State mandates.

Marina del Rey and the Westside Islands are within the Westside Service Area, with services by an exclusive commercial franchise waste hauler (DPW 2024). The waste hauler for these communities is Waste Management G.I. Industries. Ladera Heights, View Park, and Windsor Hills and West Fox Hills are within the Mesa Heights Garbage Disposal District, where Universal Waste Systems is the primary waste hauler (DPW 2024).

## 5.19.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County Practice, a project would normally have a significant effect on the environment if the project:

U-1 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.

U-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

U-3 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.

U-4 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.

U-5 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

## 5.19.3 Environmental Impacts

### 5.19.3.1 METHODOLOGY

Evaluation of potential impacts related to the provision of stormwater, water, wastewater, and solid waste services is based on a review of existing policies, documents, and studies that address services in the county. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify potential environmental effects based on the standards of significance in this section. In determining the level of significance, the analysis assumes that future development projects facilitated by the WSAP would comply with relevant federal, state, and local laws, ordinances, and regulations.

### 5.19.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 8:** A sustainable built environment.

- **Policy LU 8.3.** Encourage developers to exceed State Building Codes for site improvements and buildings that reduce the use of energy, water, and nonrenewable resources, reduce pollution and greenhouse gas emissions; and employ other sustainable measures (e.g., LEED, Living Building Challenge).

- **Policy LU 8.5.** Incorporate sustainable landscaping and water management practices in parklands, medians and along street frontages and trails (bioswales, permeable surfaces, stormwater capture, native species, etc.).

**Implementation Program LUI 7.** Create educational materials promoting property maintenance and improvement and approaches for sustainable, healthy, and resilient development (e.g., solar, landscape, irrigation, other) and post on the County's website.

### Conservation and Natural Resources Element

**Goal COS 1:** The natural environment and natural resources are sustained for enjoyment and equitable use by future generations of Westside residents.

- **Policy COS 1.2.** Conserve and protect water quality and supply and continue to provide assistance for urban water management plans through continual partnership with the West Basin Municipal Water District.

**Goal COS 4:** Resources are conserved and infrastructure is adapted to improve resilience and minimize contributions to climate change.

- **Policy COS 4.3.** Educate community members about sustainable best practices through collaboration with education institutions such as West Los Angeles College and 54th Street Charter School, community groups, and major businesses to conduct educational outreach efforts. Topics discussed can include conservation of natural resources (water, electricity, and gas), recycling, and waste management.

**Implementation Program COSI 2.** Support the California Department of Fish and Wildlife's implementation of the plan for the protection, conservation, and restoration of the Ballona Wetlands.

### Public Facilities and Services

**Goal PF 3:** Infrastructure and utility systems that provide reliable and equitable services to Westside residents.

- **Policy PF 3.1.** Minimize visual impacts of existing electrical distribution and transmission lines near Slauson Avenue and La Brea Avenue, and other locations.

## 5.19.3.3 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.19-1: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? [Threshold U-1]**

**Less Than Significant Impact.** There are no specific development projects that are identified or included as part of the WSAP. However, implementation of the WSAP would result in higher density residential and mixed-use zones within the identified 12 Opportunity Sites[2] shown on Figure 3-5, *Opportunity Sites Map*, in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. These proposed changes in land use

[2] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

and zoning would allow for future construction of additional residential/mixed-use developments and therefore result in population growth and additional demand for public utility systems.

The WSAP includes goals and policies that relate to water conservation, energy efficiency, and waste management. Policy COS 1.2 ensures the collaboration with the West Basin District to conserve and protect water quality and supply; Policy LU 8.3 encourages developers to exceed the State Building Code in order to reduce energy and water for buildings and site improvements. The Planning Area and surrounding areas are highly urbanized and are currently served by existing utility infrastructure, and the WSAP would not extend any utility or service system into undeveloped areas that are currently unserved by utilities. Any necessary upgrades to these local utility systems would not be expected to result in significant environmental impacts from construction beyond those already projected by the providers and from individual future projects. Future development facilitated by the implementation of the WSAP would be analyzed on a project-by-project basis, and impacts to wastewater, electricity, or telecommunication facilities would be site specific. As such, implementation of the WSAP would not create new demand related to water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

**Impact 5.19-2: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? [Threshold U-2]**

**Less Than Significant Impact.** The WSAP is a long-range policy document that would facilitate higher density development than is currently allowed, increasing residential density and commercial/mixed-use development. Land use changes and zoning updates in the Planning Area are focused in Ladera Heights, View Park, and Windsor Hills and West Fox Hills. No changes outside of these communities are proposed under the WSAP.

Future development facilitated by the implementation of the WSAP would need to comply with General Plan policies. Applicable General Plan policies include Policy PS/F 2.1, which encourages support water conservation measures; Policy PS/F 2.2, which supports educational outreach efforts that discourage wasteful water consumption; Policy PS/F 3.1 to increase the supply of water through the development of new sources, such as recycled water, gray water, and rainwater harvest; and Policy PS/F 3.2 to support the increased production, distribution, and use of recycled water, gray water, and rainwater harvesting to provide groundwater recharge, irrigation, and other uses. Compliance with these existing General Plan policies would encourage water conservation and increased water supply to reduce significant environmental effects associated with water supplies. The WSAP Policy COS 1.2 encourages protection of existing water resources through collaboration with the West Basin District, which would support future development facilitated with implementation of the WSAP, along with Policy COS 4.3, which encourages educational outreach in the communities that discuss sustainable practices regarding the use of natural resources.

The West Basin District supplies water to Planning Area. The West Basin District's 2020 UWMP projects there is sufficient water supply to support existing and projected population growth in the region, as defined by SCAG growth projections, during single and multiple dry year scenarios through the year 2045. The County has also prepared an Integrated Regional Water Management Plan that provides a regional assessment of

supplies and demands. Future development projects would need to be analyzed on a project-by-project basis. However, sufficient water supplies would be available to serve reasonably foreseeable future development during normal, dry, and multiple dry years, consistent with West Basin District's UWMP projections. Therefore, impacts would be less than significant.

**Impact 5.19-3: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? [Threshold U-3]**

**Less Than Significant Impact.** The implementation of the WSAP would result in higher density residential and mixed-use zones within the identified 12 Opportunity Sites (excluding Inglewood Oil Field which would continue to be governed by the BHCSD) shown in Figure 3-5, *Opportunity Sites Map*, in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. These proposed changes in land use and zoning would allow for future construction of additional residential/mixed-use developments and therefore result in population growth and additional demand on wastewater treatment systems. However, analysis on wastewater treatment and capacity would be assessed a project-by-project basis. Policy COS 1.2 encourages collaboration with the West Basin District to conserve water supplies and quality. The West Basin District's 2020 UWMP projects there is sufficient water supply to support the region during single and multiple dry year scenarios through the year 2045. The West Basin District's 2020 Recycled Water Master Plan evaluates new opportunities to expand recycled water service and develop an updated plan that outlines potential improvement projects through the year 2040 that can be incorporated into the West Basin District's Capital Improvement Program (CIP). West Basin District's CIP focus on the installation of new infrastructure and equipment or the restoration of existing assets, including the expansion of treatment plants. The Edward C. Little Water Recycling Facility serves the Planning Area and currently has a 40 mgd capacity.

Future projects developed within Ladera Heights, View Park, and Windsor Hills and West Fox Hills would estimate the volume of wastewater the project would generate by utilizing the District's average wastewater generation factors to determine if sufficient wastewater facilities are available. The A.K. Warren Water Resource Facility has a 400 mgd capacity. Future development associated with implementation of the WSAP would comply with General Plan Policy PS/F 4.2, which requires the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where development is encouraged. General Plan Policy PS/F 5.1 supports an efficient, safe, and responsive waste management system that reduces waste while protecting the health and safety of the public, and Policy PS/F 4.2 requires the County to support capital improvement plans and improve on aging and insufficient wastewater infrastructure. Accordingly, future related projects would be required to comply with local regulations and General Plan policies. Implementation Program Policy PS/F 1, Planning Area CIP, requires Regional Planning and Public Works to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs, and would ensure adequate treatment capacity is available in the Planning Area to service future development. Therefore, impacts to wastewater treatment capacity would be less than significant.

**Impact 5.19-4: 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? [Thresholds U-4]**

**Less Than Significant Impact.** As previously mentioned, no physical development is proposed under the WSAP. However, future development facilitated by the implementation of the WSAP could indirectly lead to population growth and would generate solid waste. Waste generated by construction facilitated by the WSAP is subject to County Code Chapter 20.87, which states that generated debris would be recycled on-site or at local recycling facilities. Future development would also be required to comply with applicable waste management requirements, including Senate Bill 1383, which mandates organic waste collection to divert food waste from landfills.

Implementation of the WSAP would facilitate a higher density of development than is currently allowed and would result in an increase in the generation of solid waste. However, the WSAP would not induce an increase in regional population beyond SCAG projections. As a result, development allowed by the WSAP would not increase solid waste beyond projections anticipated by regional solid waste management facilities. Furthermore, future development would be required to comply with applicable waste management requirements and existing General Plan policies, including Policies PS/F 5.1, Policy PS/F 5.2, Policy PS/F 5.4, Policy PS/F 5.5, and Policy PS/F 5.6. Therefore, implementation of the WSAP would not generate substantial solid waste or impair attainment of solid waste reduction goals, and impacts would be less than significant.

**Impact 5.19-5: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? [Thresholds U-5]**

**Less Than Significant Impact.** As previously mentioned, no physical development is proposed under the WSAP; however, future development associated with implementation of the WSAP would generate solid waste. All solid waste-generating activities in the County of Los Angeles are subject to the requirements in AB 341 (Chapter 476, Statutes of 2011), which amended the California Integrated Waste Management Act of 1989 and requires diversion of a minimum of 75 percent of solid waste generated be source-reduced, recycled, or composted. Disposal of waste generated from implementation of the WSAP would be consistent with all state regulations and the policies within the Los Angeles County Integrated Waste Management Plan. Future development associated with implementation of the WSAP would comply with all solid waste statutes and regulations. Therefore, impacts associated with conflict with federal, state, or local statutes or regulations related to solid waste would be less than significant.

## 5.19.4 Cumulative Impacts

For the purposes of this analysis of cumulative impacts related to utilities and service systems, the geographic area of consideration (i.e., the cumulative impacts study area) is Los Angeles County. This geographic scope of analysis is appropriate for the analysis of utilities and service systems because cumulative projects have the potential to cause significant impacts in Los Angeles County if they exceed the capacity of current and projected infrastructure accounted for in the General Plan.

**Impact 5.19-6: Would the Project cause or make a cumulatively considerable contribution to a significant cumulative impact relating to the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? [Threshold U-1]**

**Less Than Significant Impact.** There are no specific development projects that are identified or included as part of the WSAP. However, implementation of the WSAP would result in higher density residential and mixed-use zones within 12 Opportunity Sites in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. These proposed changes in land use and zoning would allow for future construction of additional residential/mixed-use developments and therefore result in population growth and additional demand for public utility systems. Future development associated with implementation of the WSAP could result in the construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, which could result in a significant impact. However, the WSAP includes goals and policies targeted to water conservation, waste management, and energy efficiency. Land use changes and zoning updates are confined to Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. The Planning Area and surrounding areas are highly urbanized and are currently served by existing utility infrastructure, and the WSAP would not extend any utility or service system into undeveloped areas that are currently unserved by utilities. Therefore, there would be a less than cumulatively considerable impact.

**Impact 5.19-7: Would the Project cause or make a cumulatively considerable contribution to a significant cumulative impact relating to insufficient water supplies? [Threshold U-2]**

**Less Than Significant Impact.** There are no specific development projects that are identified or included as part of the WSAP. However, implementation of the WSAP would result in higher density residential and mixed-use zones within 12 Opportunity Sites in the Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. These proposed changes in land use and zoning would allow for future construction of additional residential/mixed use developments and therefore result in population growth and additional demand for public utility systems. Future development facilitated by the implementation of the WSAP would need to comply with General Plan policies. Compliance with the existing General Plan policies would encourage water conservation and increased water supply to reduce significant environmental effects associated with water supplies. Local water wholesalers and retailers are required to prepare UWMPs to identify water demands and supplies for wet years, dry years, and extended periods of drought. The County has also prepared an Integrated Regional Water Management Plan that provides a regional assessment of supplies and demands. Future development would need to be analyzed on a project-by-project basis to determine sufficient water supply. Therefore, there would be a less than cumulatively considerable impact.

**Impact 5.19-8: Would the Project cause or make a cumulatively considerable contribution to a significant cumulative impact relating to inadequate wastewater treatment capacity? [Threshold U-3]**

**Less Than Significant Impact.** The WSAP is a long-range policy document that would facilitate higher density development than is currently allowed, increasing residential density and commercial/mixed-use development. No physical development is being proposed under the WSAP. Land use changes and zoning

updates are confined to Ladera Heights, View Park, and Windsor Hills and West Fox Hills communities. Wastewater treatment would potentially increase as future projects are developed. Policies and goals outlined in the General Plan and the WSAP would ensure future projects do not exceed capacity of wastewater treatment. Policy PS/F 5.1 supports an efficient, safe and responsive waste management system that reduces waste while protecting the health and safety of the public. Policy PS/F 4.2 requires the County to support capital improvement plans and improve on aging and insufficient wastewater infrastructure. Accordingly, future related projects would be required to comply with local regulations and General Plan policies. Given that the WSAP would not induce regional population growth beyond SCAG projections, regional wastewater treatment facilities would accommodate the local increases without increasing overall regional demand projections. Future related projects would be required to comply with local regulations and General Plan policies. Therefore, there would be a less than cumulatively considerable impact.

**Impact 5.19-9: Would the Project cause or make a cumulatively considerable contribution to a significant cumulative impact relating to the generation of 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? [Thresholds U-4]**

**Less Than Significant Impact.** Future development facilitated by the implementation of the WSAP could indirectly lead to population growth and would generate solid waste. Policies and goals outlined in the General Plan would ensure that future projects do not exceed the combined capacity of solid waste disposal infrastructure in Los Angeles County. The intent is to increase solid waste diversion to reduce the amount of solid waste placed in landfills. The WSAP would not induce an increase in regional population beyond SCAG projections. As a result, development allowed by the WSAP would not increase solid waste beyond projections anticipated by regional solid waste management facilities. Future development under the WSAP and other closely related past, present, and reasonably foreseeable future projects would be required to comply with all solid waste statutes and regulations. As a result, the WSAP's contribution to cumulative demands for excess solid waste would not be considerable.

**Impact 5.19-10: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to a cumulatively considerable contribution to solid waste? [Thresholds U-5]**

**Less Than Significant Impact.** Future projects facilitated by the WSAP would potentially generate solid waste. All solid waste-generating activities within the County of Los Angeles are subject to the requirements in AB 341 (Chapter 476, Statutes of 2011), which amended the California Integrated Waste Management Act of 1989 and requires diversion of a minimum of 75 percent of solid waste generated be source-reduced, recycled, or composted. Disposal of waste generated from implementation of the WSAP would be consistent with all state regulations and the policies within the Los Angeles County Integrated Waste Management Plan. Future development under the WSAP and other closely related past, present, and reasonably foreseeable future projects would be required to comply with all solid waste statutes and regulations. Therefore, the WSAP would not cause or contribute to any significant cumulative impact associated with conflict with federal, state, or local statutes or regulations related to solid waste.

## 5.19.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, all impacts are considered less than significant.

## 5.19.6 Mitigation Measures

No significant adverse impacts related to utilities and service systems were identified and no mitigation measures are required.

## 5.19.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to utilities and service systems have been identified.

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# 5. Environmental Analysis
## UTILITIES AND SERVICE SYSTEMS

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# 5.20 WILDFIRE

This section identifies and evaluates issues related to wildfire to determine whether implementation of the Westside Area Plan (WSAP or proposed Project) could result in a significant impact. This section describes the environmental and regulatory setting, the criteria and thresholds used to evaluate the significance of impacts, the methods used in evaluating these impacts, and the results of the impact assessment.

During the scoping period for the Draft Program Environmental Report (PEIR), written and oral comments were received from agencies, organizations, and the public (Appendix A). Table 2-1, *Notice of Preparation and Comment Letters Summary*, in Chapter 2, *Introduction*, includes a summary of comments received during the scoping comment period. Comments relating to wildfire were considered in preparation of this section.

## 5.20.1 Environmental Setting

### 5.20.1.1 REGULATORY BACKGROUND

#### Federal Laws, Regulations, and Policies

##### *National Cohesive Wildfire Management Strategy*

In the Federal Land Assistance, Management, and Enhancement Act of 2009 (FLAME Act), Congress mandated the development of a National Cohesive Wildland Fire Management Strategy for all lands in the United States. Wildfire management is guided by the National Cohesive Wildland Fire Management Strategy, which has three primary goals—resilient landscapes, fire adapted communities, and safe and effective wildfire response (USDI and USDA 2014). These three goals enable land managers to manage vegetation and fuels; protect homes, communities, and other values at risk; manage human-caused ignitions; and effectively and efficiently respond to wildfires. California is part of the Western Regional Strategy Committee, chartered to support and facilitate the implementation of the National Cohesive Wildland Fire Strategy.

##### *National Fire Protection Association Standards*

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. NFPA standards are recommended (advisory) guidelines for fire protection that are referenced in the California Fire Code (CFC), which is adopted by the County of Los Angeles (County) every three years. Specific standards applicable to wildfire hazards include, but are not limited to:

- **NFPA 1141,** Fire Protection Infrastructure for Land Development in Wildlands
- **NFPA 1142,** Water Supplies for Suburban and Rural Fire Fighting
- **NFPA 1143,** Wildland Fire Management
- **NFPA 1144,** Reducing Structure Ignition Hazards from Wildland Fire

- **NFPA 1710,** Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations

## State Laws, Regulations, and Policies

### *California Department of Forestry and Fire Protection*

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. CAL FIRE provides fire assessment and firefighting services for land in State Responsibility Areas (SRA), conducts educational and training programs, provides fire planning guidance and mapping, and reviews general plan safety elements to ensure compliance with State fire safety requirements. CAL FIRE staff, or a designee, also reviews building permit applications, parcel maps, and use permits for construction or development in SRAs and Local Responsibility Areas.

The Board of Forestry and Fire Protection is a government-appointed approval body within CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of CAL FIRE, and representing the state's interest in federal forestland in California. The Board of Forestry and Fire Protection also promulgates regulations and approves general plan safety elements that are adopted by local governments for compliance with State statutes.

The California Office of the State Fire Marshal supports the mission of CAL FIRE by focusing on fire prevention. These responsibilities include regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention within wildland areas; regulating hazardous liquid pipelines; developing and renewing regulations and building standards; and providing training and education in fire protection methods and responsibilities. These are accomplished through major programs, including engineering, education, enforcement, and support from the Board of Forestry and Fire Protection. For jurisdictions in SRAs or very high fire hazard severity zones (FHSZ), the Land Use Planning Program division of the Office of State Fire Marshal reviews safety elements during the update process to ensure consistency with California Government Code, Section 65302(g)(3).

Together, the Board of Forestry and Fire Protection, Office of State Fire Marshal, and CAL FIRE protect and enhance the forest resources of all wildland areas of California that are not under federal jurisdiction.

#### *Fire Hazard Severity Zones and Responsibility Areas*

CAL FIRE designates FHSZs as authorized under California Government Code Sections 51175 et seq. FHSZs may be designated Very High, High, or Moderate. CAL FIRE considers many factors when designating FHSZs, including fire history, existing and potential vegetation fuel, flame length, blowing embers, terrain, and weather patterns for the area. CAL FIRE designates FHSZs in two types of areas depending on which level of government is financially responsible for fire protection.

- **Local Responsibility Area.** Incorporated communities are financially responsible for wildfire protection.

- **State Responsibility Area.** CAL FIRE and contracted counties are financially responsible for wildfire protection.

#### *CAL FIRE Strategic Fire Plan*

CAL FIRE produced the 2018 *Strategic Fire Plan for California*, with goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments (CAL FIRE 2018). The 2018 Strategic Plan focuses on fire prevention and suppression activities to protect lives, property, and ecosystems in addition to providing natural resource management to maintain state forests as a resilient carbon sink to meet California's climate change goals. A key component of the 2018 *Strategic Fire Plan for California* is the collaboration between communities to ensure fire suppression and natural resource management is successful (CAL FIRE 2018).

### *State Responsibility Area and Very High Fire Hazard Severity Zone Fire Safe Regulations*

California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7, Subchapter 2, SRA/Very High FHSZ Fire Safe Regulations, establishes minimum wildfire protection standards for construction and development in the SRA and Very High FHSZ and requires CAL FIRE to review development proposals and enact recommendations that serve as conditions of approval in these zones. These regulations apply to all residential, commercial, and industrial buildings in the SRA and Very High FHSZ and all tentative and parcel maps. These standards include basic emergency access and perimeter wildfire protection measures, signing and building numbering, private water supply resources for emergency fire use, and vegetation modification. Fire Safe Regulations also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road. Section 1273.08, Dead-End Roads, of these standards provides regulations for the maximum lengths of single-access roadways:

- Parcels zoned for less than one acre: 800 feet
- Parcels zoned for 1 acre to 4.99 acres: 1,320 feet
- Parcels zoned for 5 acres to 19.99 acres: 2,640 feet
- Parcels zoned for 20 acres or larger: 5,280 feet

Fire Safe Regulations, Section 1299.03, Fire Hazard Reduction Around Buildings and Structure Requirements, provides defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2). In Zone 1, all dead and dying plants must be removed, as must any vegetation that could catch fire. In Zone 2, horizontal and vertical spacing among shrubs and trees must be created and maintained.

### *Public Resources Code Section 4291*

Public Resources Code (PRC) Section 4291, Mountainous, Forest-, Brush- and Grass-Covered Lands, is intended for any person who owns, lease, controls, operates, or maintains a building or structure in a mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material, regardless of whether the property is in an SRA or Very High FHSZ. This section requires

defensible space to be maintained within 100 feet from each side of a structure. An ember-resistant zone is also required within 5 feet of a structure and more intense fuel reduction between 5 and 30 feet of a structure.

### California Building Standards Code

The California Buildings Standards Code (CCR Title 24) provides 12 different codes for construction and buildings in California. This code is updated every three years, with the most recent version effective January 1, 2023. The County of Los Angeles regularly adopts the most recent version of the California Building Standards Code, with modifications, into the County Code of Ordinances, Title 26, Building Code.

#### *Building Design Standards*

The California Building Code (CBC), Part 2 of CCR Title 24, identifies building design standards, including those for fire safety. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Residential buildings are plan checked by local city building officials for compliance with the CBC and any applicable local edits. Typical fire safety requirements of the CBC include the installation of sprinklers in buildings and other facilities; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction in high FHSZs; requirements for smoke-detection systems; exiting requirements; and the clearance of debris.

#### *Materials and Methods for Exterior Wildfire Exposure*

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new buildings in an FHSZ or Wildland Urban Interface. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other requirements include vegetation management compliance, as prescribed in the CFC Section 4906 and PRC Section 4291.

### California Fire Code

The California Fire Code (CFC) incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in 24 CCR Part 9, and like the CBC, is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide but a local jurisdiction may adopt more restrictive standards based on local conditions. The County of Los Angeles regularly adopts each new CFC update under County Code of Ordinances Title 32, Fire Code. The CFC is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all 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 wildfire hazard areas.

### *Fire Safety During Construction and Demolition*

Chapter 33 of the CFC, Fire Safety During Construction and Demolition, provides requirements for fire safety precautions during construction and demolition of a development project. The purpose of this chapter is to provide reasonable safety to life and property from fire during construction and demolition operations, including those in underground locations. Specific requirements include a prohibition of smoking on-site, except for in approved areas; management of combustible materials and debris; cutting and welding; electrical wiring; and cooking. Additional requirements include the preparation of site safety plans prior to building permit issuance, providing fire watch during nonworking hours, and maintaining water supply for fire protection as soon as combustible materials arrive on a project site.

### *Wildland-Urban Interface Areas*

Chapter 49, Requirements for Wildland Urban Interface Fire Areas, of the CFC applies to any geographical area identified as a FHSZ by CAL FIRE. It defines FHSZs, connects to the SRA/Very High FHSZ Fire Safe Regulation requirements for defensible space, and parallels requirements for wildfire protection building construction and hazardous vegetation fuel management in other sections of the CCR and the PRC. Chapter 49 of the 2022 CFC includes a definition for the wildland-urban interface (WUI) and provides requirements for fire protection plans, landslide plans, long-term vegetation management, and creation and maintenance of defensible space for all new development within the WUI.

## *California Public Utilities Commission*

In 2007, wildfires in southern California were ignited by overhead utility power lines and aerial communication facilities near power lines. In response, the California Public Utilities Commission (CPUC) began considering and adopting regulations to protect the public from fire hazards due to overhead power lines and nearby aerial communication facilities. The CPUC published a Fire Threat Map under Rulemaking 15-05-006 following procedures in Decision 17-01-009, revised by Decision 17-06-024, which adopted a work plan for the development of a utility High Fire Threat District where enhanced fire safety regulations in Decision 17-12-024 apply (CPUC 2021). The fire regulations require electric utilities to (CPUC 2017):

- Prioritize the correction of safety hazards.
- Correct nonimmediate fire risks in "Tier 2" (elevated fire threat) areas on the CPUC High Fire-Threat District within 12 months, and in "Tier 3" (extreme fire threat) areas within 6 months.
- Maintain increased clearances between vegetation and power lines within the High Fire Threat District.
- Maintain stricter wire-to-wire clearances for new and reconstructed facilities in Tier 3 areas.
- Conduct annual inspections of overhead distribution facilities in rural areas of Tier 2 and Tier 3 areas.
- Prepare a fire prevention plan annually if overhead facilities exist in the High Fire Threat District.

### *California Environmental Quality Act*

In November 2022 the California Attorney General issued the "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act." This guidance document was designed to help lead agencies comply with CEQA (PRC Section 21000 et seq) when considering whether to approve projects in wildfire-prone areas. These areas are often in the WUI area—i.e., the area where the built environment meets or intermingles with the natural environment. This guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project's impacts on wildfire ignition risk, emergency access, and evacuation. The guidance is aimed at proposed development projects such as residential, recreational, or commercial developments. The extent to which it applies will vary by project based on project design and location. It does not impose additional requirements on local governments or alter any applicable laws or regulations, but is intended to provide guidance on some of the issues, alternatives, and mitigation measures that should be considered during the environmental review process.

## Local Laws, Regulations, and Policies

### *Los Angeles County General Plan*

**Safety Element**

The Safety Element of the County General Plan (General Plan) includes the following goals and policies related to wildfire, emergency response, and evacuation, which would be applicable to future development in the Project area or to future development within a FHSZ near the Project area (County of Los Angeles 2022):

**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 1.3.** Require developments to mitigate geotechnical hazards, such as soil instability and landslides, in Hillside Management Areas through siting and development standards.

**Goal S 2:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to climate hazards and climate-induced secondary impacts.

- **Policy S 2.2.** Plan for future climate impacts on critical infrastructure and essential public facilities.
- **Policy S 2.3.** Require new residential subdivisions and new accessory dwelling units within hazard areas to meet required evacuation standards.

**Goal S 3:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to flood and inundation hazards.

- **Policy S 3.6.** Infiltrate development runoff on-site, where feasible, to preserve or restore the natural hydrologic cycle and minimize increases in stormwater or dry weather flows.

**Goal S 4:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.

- **Policy S 4.1.** Prohibit new subdivisions in very high fire hazard severity zones (VHFHSZs) unless: (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other fire hazard severity zones (FHSZs).

- **Policy S 4.2.** New subdivisions shall provide adequate evacuation and emergency vehicle access to and from the subdivision on streets or street systems that are evaluated for their traffic access or flow limitations, including but not limited to weight or vertical clearance limitations, dead-end, one-way, or single lane conditions.

- **Policy S 4.4.** Reduce the risk of wildland fire hazards through meeting minimum state and local regulations for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.

- **Policy S 4.6.** Ensure that infrastructure requirements for new development meet minimum State and local regulations for ingress, egress, peak load water supply availability, anticipated water supply, and other standards within FHSZs.

- **Policy S 4.7.** Discourage building mid-slope, on ridgelines and on hilltops, and employ adequate setbacks on and below slopes to reduce risk from wildfires and post-fire, rainfall induced landslides and debris flows.

- **Policy S 4.8.** Support the retrofitting of existing structures in FHSZs to meet current safety regulations, such as the building and fire code, to help reduce the risk of structural and human loss due to wildfire.

- **Policy S 4.12.** Support efforts to incorporate systematic fire protection improvements for open space, including the facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression.

- **Policy S 4.14.** Encourage the strategic placement of structures in FHSZs that conserves fire suppression resources, increases safety for emergency fire access and evacuation, and provides a point of attack or defense from a wildfire.

- **Policy S 4.16.** Require local development standards to meet or exceed SRA Fire Safe Regulations, which include visible home and street addressing and signage and vegetation clearance maintenance on public and private roads; all requirements in the California Building Code and Fire Code; and Board of Forestry Fire Safe Regulations.

- **Policy S 4.17.** Coordinate with agencies, including the County Fire Department and County of Los Angeles of Department of Agricultural Commissioner/Weights and Measures (ACWM,) to ensure that effective fire buffers are maintained through brush clearance and fuel modification around developments.

- **Policy S 4.18.** Require Fire Protection Plans for new residential subdivisions in FHSZs that minimize and mitigate potential loss from wildfire exposure, and reduce impact on the community's fire protection delivery system.

- **Policy S 4.19.** Ensure all water distributors providing water in unincorporated Los Angeles County identify, maintain, and ensure the long-term integrity of future water supply for fire suppression needs, and ensure that water supply infrastructure adequately supports existing and future development and redevelopment, and provides adequate water flow to combat structural and wildland fires, including during peak domestic demand periods.

- **Policy S 4.20.** Prohibit new and intensification of existing general assembly uses in VHFHSZs unless: (1) the use is located in an existing approved specific plan or (2) the County determines there is sufficient secondary egress and the County determines the adjoining major highways and street networks are sufficient for evacuation, as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new general assembly uses in all other FHSZs.

**Goal S 7:** Effective County emergency response management capabilities.

- **Policy S 7.1.** Ensure that residents are protected from the public health consequences of natural or manmade disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.

- **Policy S 7.2.** Support County emergency providers in reaching their response time goals.

- **Policy S 7.3.** Coordinate with other County and public agencies, such as transportation agencies, and health-care providers on emergency planning and response activities, and evacuation planning.

- **Policy S 7.5.** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

- **Policy S 7.6.** Ensure that essential public facilities are maintained during disasters, such as flooding, wildfires, extreme temperature and precipitation events, drought, and power outages.

### *County of Los Angeles Code of Ordinances*

The County of Los Angeles Code of Ordinances includes various directive to minimize adverse wildfire impacts from development in the Project area. The Code of Ordinances is organized by title, chapter, section. Most provisions related to wildfire and evacuation are in Title 20, Utilities; Title 22, Planning and Zoning; Title 26, Building Code; and Title 32, Fire Code, as follows:

- **Section 20.16.060, *Minimum Fire Flow and Fire Hydrant Requirements.*** This section provides minimum fire flow and fire hydrant requirements for new development. For development in Very High Fire Hazard Severity Zones, this section also requires that the fire flow be provided by a gravity-fed source or two means of pumping the water uphill.

- **Chapter 22.104, *Hillside Management Areas*.** This chapter seeks to preserve and enhance the physical integrity of Hillside Management Areas (HMA) by locating development outside of HMAs, to the extent feasible. Development within HMAs is generally subject to the Hillside Design Guidelines (Appendix I of Chapter 22.104), which require "sensitive hillside design techniques" and consideration of natural environmental hazards, such as fire.

- **Title 26, *Building Code.*** This chapter adopts the CBC into the County Code of Ordinances. Additionally, Chapter 7A provides standards for ignition-resistant construction, roofing, and fire sprinkler systems.

- **Title 32, *Fire Code.*** This chapter adopts the CFC into the County Code of Ordinances. This includes requirements for new development to be reviewed by Los Angeles County Fire Department, defensible space and vegetation management, fire access roads in developed areas, and minimum fire flow.

### *County of Los Angeles All-Hazards Mitigation Plan*

The purpose of hazard mitigation planning is to reduce the loss of life and property by minimizing the impact of disasters. The County of Los Angeles All-Hazards Mitigation Plan (HMP) was prepared and adopted in May 2020 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The HMP includes an assessment of hazards and vulnerabilities and a set of mitigation actions for the County. In the context of an HMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. The HMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations, and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide.

### *County of Los Angeles Operational Area Emergency Operations Plan*

The County of Los Angeles Office of Emergency Management is responsible for coordinating agency response to disasters or other large-scale emergencies in the county. The County of Los Angeles Operational Area Emergency Operations Plan (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination, procedures to maintain communications with regional and State emergency response teams, and methods to assess the extent of damage and management of volunteers, as well as identifies the location of Emergency Operations Centers. The EOP uses the Standardized Emergency Management System as required by California Government Code Section 8607(a) for managing responses to multiagency and multi-jurisdictional emergencies in California, including those related to hazardous materials.

### *Los Angeles County Fire Department 2020 Strategic Fire Plan*

The Los Angeles County Fire Department 2020 Strategic Fire Plan provides an overview of the fire landscape in Los Angeles County in incorporated and unincorporated areas. The plan also provides pre-fire management strategies and tactics to reduce the risk of fire affecting people and structures. These strategies include fire prevention, vegetation management, a robust fire protection system, and individuals division and battalion

program plans. The plan also provides a list of pre-fire projects conducted from 2016 through 2020 to reduce wildfire risk throughout the county.

### *Community Standards Districts*

#### *Baldwin Hills Community Standards District (BHCSD)*

The Baldwin Hills Community Standards District (BHCSD) was adopted in 2008 by the County to establish additional regulations for oil and gas production activities in the unincorporated portion of the Inglewood Oil Field. The BHCSD was established to provide a means of implementing advanced regulations, safeguards, and controls for activities related to drilling and production of oil and gas within the oil field in the Baldwin Hills area of the county. The objective is to ensure that oil field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of operations, to regulate operations so they are compatible with surrounding land uses, and to enhance the appearance of the site with landscaping and other property maintenance requirements. The County has started the process of amending the BHCSD, per the September 15, 2021, Board of Supervisors motion, to prohibit new oil wells and allow existing oil wells to continue operating under a nonconforming status. The BHCSD Amendment, proposes to amend the County Code (Title 22) to align the BHCSD with the Oil Well Ordinance. This Amendment includes prohibiting the location of new oil wells and production within the BHCSD area, making existing oil wells and production facilities nonconforming due to use, and maintaining regulations for existing oil wells and production facilities during the amortization period.

Additionally, the Multiple Agency Coordination Committee was established to coordinate activities between the various agencies with regulatory authority over oil operations within the BHCSD. The agencies in the committee are:

- County of Los Angeles
  - LA County Planning
  - Fire Department
  - Department of Public Works
  - Department of Public Health
- Culver City
- State of California
  - California Geologic Energy Management Division
  - Regional Water Quality Control Board
- South Coast Air Quality Management District

### 5.20.1.2 EXISTING CONDITIONS

## Wildfire Background

According to Public Resources Code Sections 4103 and 4104, the term "wildfire" refers to any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. In recent years, wildfires have been moving from traditionally wildland areas with natural vegetation into more urban areas, that is, the WUI, threatening homes, businesses, and essential infrastructure. Though wildfires play an important role in the ecology of many natural habitats, risks to human safety and property increase as urban development moves into areas susceptible to wildfire hazards.

### *Types of Wildfires*

There are three basic types of wildfires:

- **Crown fires** burn trees to their tops and are the most intense and dangerous wildland fires.
- **Surface fires** burn surface litter and duff and are known for being the easiest fires to extinguish and causing the least damage. Brush and small trees enable surface fires to reach treetops, and so are referred to as *ladder fuels*.
- **Underground fires** occur underground in deep accumulations of dead vegetation. These fires move very slowly and can be difficult to extinguish due to limited access (Natural Resources Canada 2018).

Wildfires burn in many types of vegetation—forest, woodland, scrub, chaparral, and grassland. Many species of native California plants are adapted to fire, and habitats such as chaparral shrubs and woodlands can recover from fire. For example, some species of chaparral plants, such as ceanothus, require intense heat for germination and therefore have flammable resins on leaves and roots that can quickly sprout up in burned areas (National Park Service 2018). Between 2010 and 2017, wildfires in California burned about 265,000 acres of forest land, 207,000 acres of scrub vegetation, 99,000 acres of grassland, 18,000 acres of desert vegetation, and 14,000 acres of other vegetation types (BoF 2018). Wildfires have been observed to be more frequent and growing in intensity over the past several years, with 4,304,379 acres and 2,568,948 acres burning in 2020 and 2021, respectively (CAL FIRE 2023b).

### *Wildfire Causes*

Although the term *wildfire* suggests natural origins, a 2017 study that evaluated 1.5 million wildfires in the United States between 1992 and 2012 found that humans were responsible for igniting 84 percent of wildfires, accounting for 44 percent of acreage burned (Balch et al. 2017). The three most common types of human-caused wildfires are debris burning (logging slash, farm fields, trash, etc.); arson; and equipment use (Pacific Biodiversity Institute 2007). Power lines can also ignite wildfires through downed lines, vegetation contact, conductors that collide, and equipment failures (Texas Wildfire Mitigation Project 2018). CAL FIRE determined that between 2017 and 2021, 1,344 fires and 639,437 acres burned due to electrical power and distribution lines (CAL FIRE 2023b). Lightning is the most common cause of nature-induced wildfire (Balch et al. 2017).

An analysis of U.S. Forest Service wildfire data from 1986 to 1996 determined that 95 percent of human-caused wildfires and 90 percent of all wildfires were within 0.5 mile of a road, and that about 61 percent of all wildfires and 55 percent of human-caused wildfires were within approximately 650 feet (200 meters) of a road. The study concluded that the increase in human-caused ignition greatly outweighs the benefits of increased access for firefighters (Pacific Biodiversity Institute 2007).

There are three primary methods of wildfire spread:

- **Embers.** Embers are the most prolific cause of home ignition, at a rate of two out of every three homes destroyed. Embers are glowing or burning pieces of vegetation or construction debris that are lofted during a wildfire and can move up to a mile ahead of a wildfire, especially during high winds. These small embers or sparks may fall on the vegetation near a home (on dry leaves, needles, or twigs on the roof) and subsequently ignite the home. Embers can travel several miles during high wind events, such as the Santa Ana Winds, posing a potential risk to all structures without fire-resistant landscaping and construction within a mile of the fire.

- **Direct Flame Contact.** Direct flame contact refers to the transfer of heat by direct flame exposure. Direct contact will heat the building materials of the home, and if the time and intensity of exposure is severe enough, windows will break, and materials will ignite.

- **Radiant Heat.** A house can catch fire from the heat that is transferred to it from nearby burning objects, even in the absence of direct flames or embers. By creating defensible space around homes, the risk from radiant heat is significantly reduced.

### *Secondary Effects of Wildfire*

After a high intensity wildfire is suppressed, the burn scar is typically bare of its vegetative cover, which had supported the hillsides and steeper slopes. As a result, rainstorms increase the possibility of severe landslides and debris flow in these areas. The intense heat from the fire can also cause a chemical reaction in the soil that makes it less porous, causing water to run off during precipitation events, which can lead to flooding downstream.

In addition to damaging natural environments, wildfires can injure and cause fatalities of residents and firefighters as well as damage or destroy structures and personal property. Wildfires also deplete water reserves, down power lines, disrupt communication services, and block evacuation routes. Wildfires can also indirectly cause flooding if flood control facilities become inadequate to handle increases in stormwater runoff, sediment, and debris that are likely to be generated from burn scars. Regionally, smoke from wildfires creates poor air quality that can last for days or weeks, depending on the scale of the wildfire and wind patterns.

## Wildfire in the Project Area

### *Wildfire History*

According to the CAL FIRE historic wildfire perimeter database, the Project area has experienced six major named fires in the past (CAL FIRE 2023a):

- Ladera Heights, View Park, and Windsor Hills
  - 1994: Ladera Heights Fire, 10 acres
  - 1985: Baldwin Hills Fire, 38 acres
  - 1947: Orange No. 108 Fire, 272 acres
  - 1947: Baldwin No. 33 Fire, 69 acres
  - 1946: Bennet No. 66 Fire, 284 acres

- Franklin Canyon
  - 1929: Coldwater Canyon No. 48 Fire, 212 acres

### *Wildfire Hazards*

The geography, weather patterns, and vegetation in several portions of the Project area and surrounding areas provide ideal conditions for recurring wildfires. As shown in Figure 5.20-1, *Fire Hazard Severity Zones*, the communities of Franklin Canyon and Ladera Heights, View Park, and Windsor Hills are within a Very High Fire Hazard Severity Zone.

According to CAL FIRE, the wildland-urban interface (WUI) is subdivided into the intermix zone (where houses and wildland vegetation directly mingle), the interface zone (housing adjacent to wildland vegetation, but not mingled with it), and the influence zone (areas of wildfire-susceptible vegetation surrounding the other zones) (CAL FIRE 2019). The interface and intermix zones carry the highest risk for wildfires affecting developed areas. Unlike wildfire in wildland areas, fires in WUI areas are more likely to damage or destroy buildings and infrastructure that support populations, the economy, and key services in the city. While most of the Project area is located outside of the WUI, the Franklin Canyon and Ladera Heights, View Park, and Windsor Hills communities are in the interface and influence zones, and the Marina Del Rey and Ballona wetlands are in the influence zone, as shown in Figure 5.20-2, *Wildland-Urban Interface.*

### *Factors Influencing Wildfire*

Several factors influence wildfire conditions and facilitate the spread of wildfires, including topography, fuels, weather conditions, and climate change. Human actions are also the leading cause of wildfires in California, increasing the risk of wildfire devastating natural lands and communities.

#### *Weather*

The climate in the Project area is generally referred to as "Mediterranean," with hot, dry summers and cool, wet winters. Warm summers and cold winters with rainfall are common in the city. Rainfall typically occurs during the winter months due to storm fronts that move inland from the Pacific Ocean or south from the Sierra Nevada. The Project area receives an average of approximately 15.2 inches of precipitation annually (Cal-Adapt 2024). Because the summer months are generally hot and dry, the risk of wildfires has historically been greatest in summer and fall. Relative humidity is also an important fire-related weather factor. As humidity levels drop, the dry air causes vegetation moisture levels to decrease, thereby increasing the likelihood that plant material will readily ignite and burn; the risk of wildfire increases when lightning strikes during dry periods.

Wind is a primary weather factor of wildfire behavior. Santa Ana winds are warm easterly winds that flow from the Great Basin through the desert and through the passes of the coastal mountains. The Project area is in the direct path of the ocean-bound Santa Ana winds. Wind speeds are approximately 40 miles per hour (mph) through and below passes, and canyons have gusts of up to 60 mph. As wind speeds increase, the rates of fire spread, intensity, and ember spread potential also increase. Gusty and erratic wind conditions, like those of the Santa Ana winds, can cause a wildfire to spread irregularly, making it difficult to predict its path and effectively deploy fire suppression forces. Winds from the southeast in the fall compound the severity of fire conditions, as does lower relative humidity, creating red-flag conditions. Santa Ana winds are especially dangerous because they are accompanied by low humidity, which can dry out trees and other fuel that may also be weakened by the winds. This can increase wildfire conditions in the area. Wind shifts can also occur suddenly due to temperature changes and interactions with steep slopes or hillsides, causing fires to spread unpredictably. Fall has historically been one of the most dangerous times for wildfire risk, as periods of very high temperatures, low humidity, and strong wind increases cause red flag warnings and extreme fire danger.

### *Fuel*

Each type of vegetation contributes to fire hazard severity to varying degrees. The qualities of vegetation that directly influence fire risk include fuel type and size, loading, arrangement, chemical composition, and dead and live fuel moisture, which contributes to the flammability characteristics of the vegetation. Grass and brush fuel types react quickly to changes in weather such as low humidity or high wind speeds. Fires in areas covered by this vegetation type can spread quickly in gusty wind conditions. The Marina del Rey, Ballona Wetlands, West LA/Sawtelle VA, West Fox Hills, and Gilmore Island communities are primarily urban and lack vegetative fuels, as described in Chapter 4, *Environmental Setting*, of this Draft PEIR. However, the Ladera Heights, View Park, and Windsor Hills communities are close to the Inglewood Oil Field and Kenneth Hahn State Recreation Area, which contains grass and brush fuel types. The Franklin Canyon community contains and is surrounded by forests, brush, and grassland fuel types.

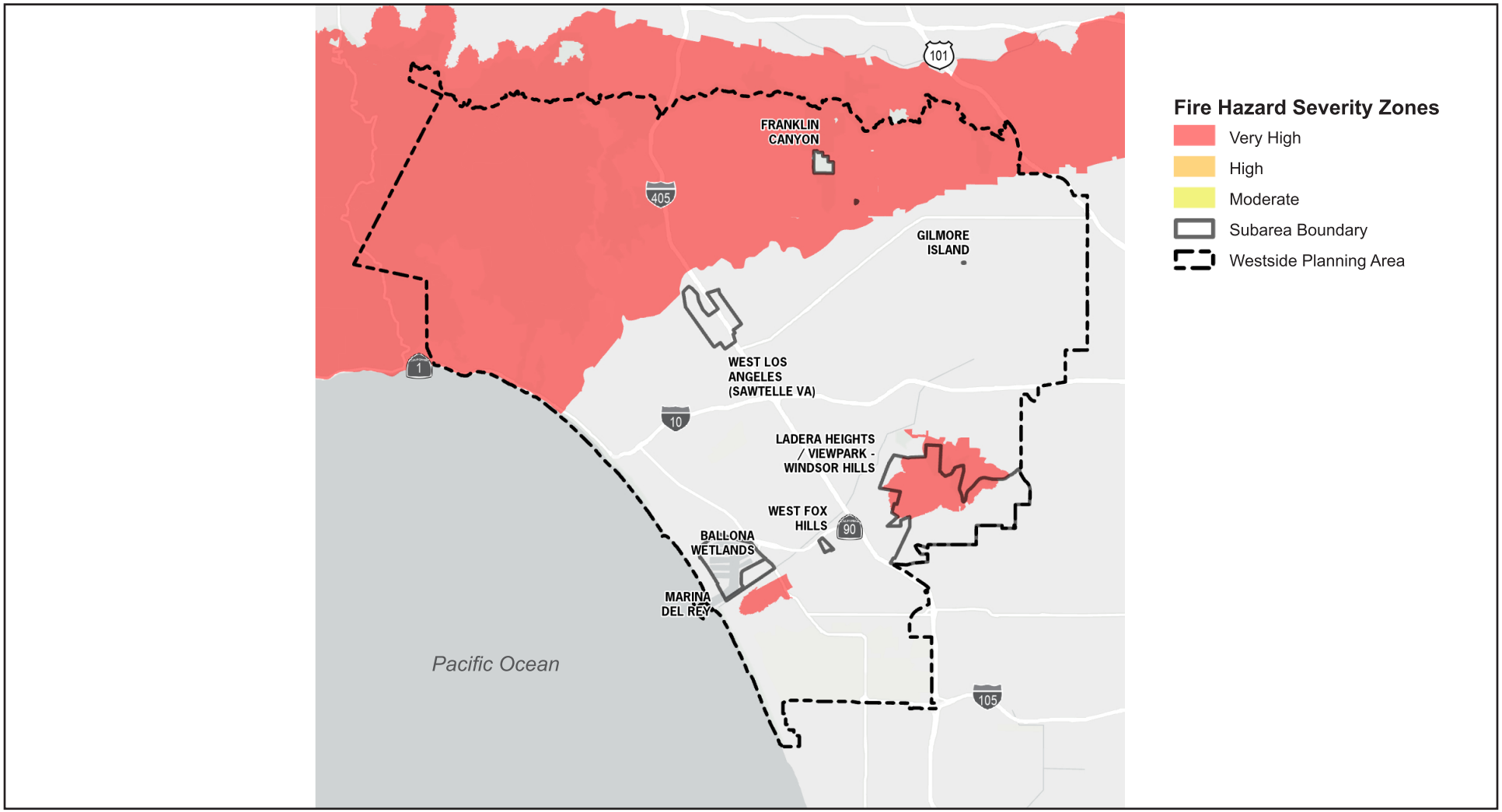
### *Topography*

Steep terrain or slope plays a key role in the rate and direction in which wildfires spread since fires will normally burn much faster uphill. When the gradient of a slope doubles, the rate of spread of a fire will also likely double. These areas would also be more susceptible to debris flow after a fire. As described in Chapter 5.7, *Geology and Soils*, of this Draft PEIR, the Project area has hilly areas, primarily in the San Monica Mountains and Baldwin Hills, a portion of which lies in the Ladera Heights, Park View, and Windsor Hills communities.

### *Human Actions*

Most wildfires are ignited by human action, the result of direct acts of arson, carelessness, or accidents. Many fires originate in populated areas along roads and around homes and are often the result of the careless disposal of cigarettes, mowing of dead grass, electrical equipment malfunction, use of equipment, or burning of debris. Recreation areas with increased human activity that are in high or very high fire hazard areas also increase the potential for wildfires.

## Figure 5.20-1 - Fire Hazard Severity Zones




*Source: County of Los Angeles 2024; PlaceWorks 2022.*

# 5. Environmental Analysis
## WILDFIRE

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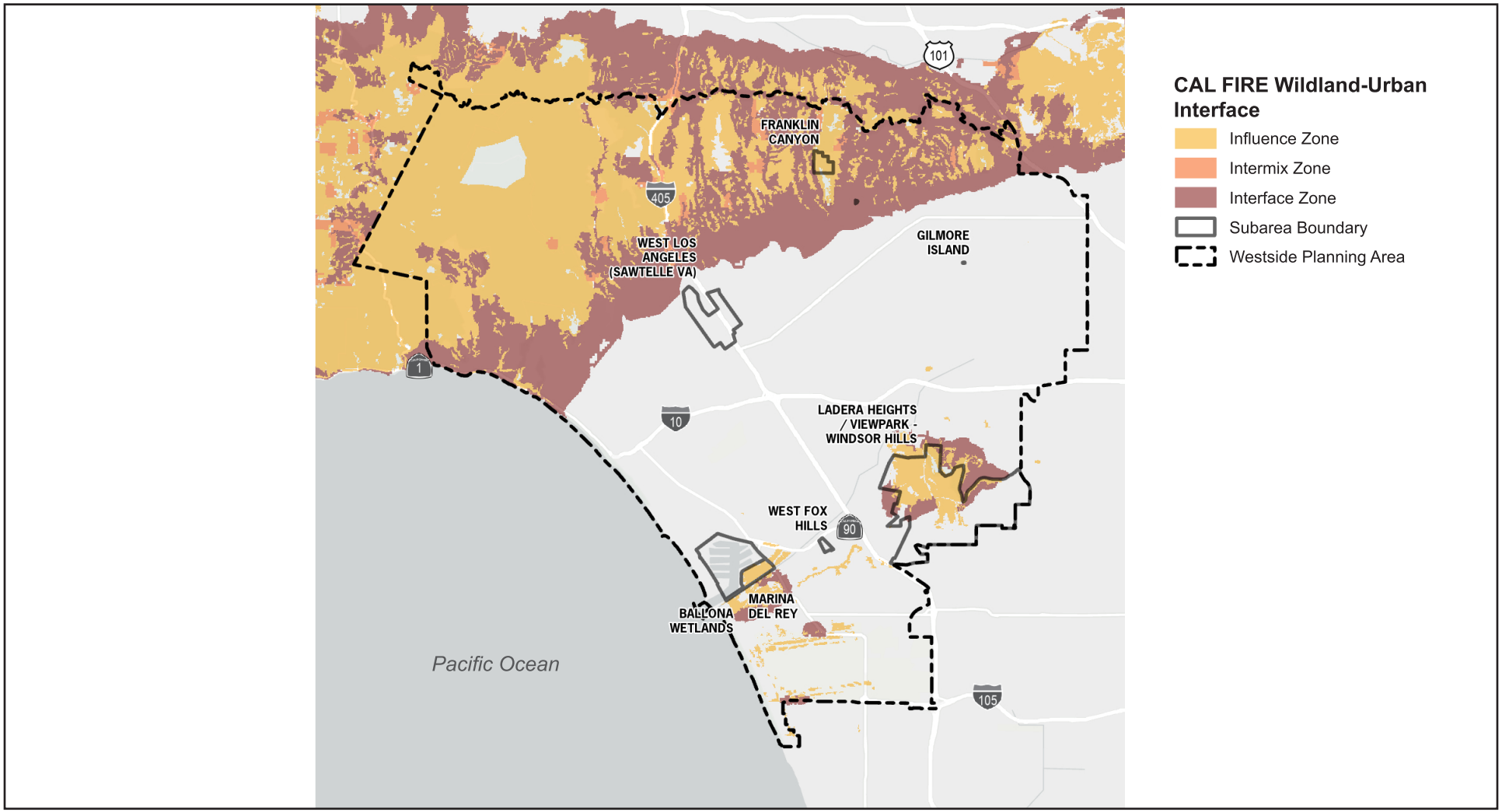
## Figure 5.20-2 - Wildland-Urban Interface




*Source: County of Los Angeles 2024; PlaceWorks 2022.*

# 5. Environmental Analysis
## WILDFIRE

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*Climate Change*

Climate change is likely to increase annual average maximum temperatures in the Project area from a historical 71.3 degrees Fahrenheit (°F), to 75.5 °F by 2050 and 78.6 °F by 2099 (Cal-Adapt 2024). This will likely create warmer temperatures earlier and later in the year. Precipitation levels are projected to increase slightly over the course of the century, changing from a historical annual average of 15.2 inches per year to an annual average of 15.6 inches by 2050 and an annual average of 17.9 inches by 2099 (Cal-Adapt 2024). Variations in precipitation patterns will also lead to an increase in frequency and intensity of heavy precipitation events as well as prolonged periods of drought. The combination of extreme heat and droughts can cause soils and vegetation to dry out, creating more fuel for wildfires. These factors are expected to increase wildfire conditions, creating the risk of more frequent and intense wildfires. Because wildfires burn the trees and other vegetation that help stabilize a hillside and absorb water, more areas burned by fire may also lead to an increase in landslides and floods. Due to historic wildfires in the Project area, it is likely that wildfires could burn again in the Project area.

## Fire Protection Resources: Los Angeles County Fire Department

Los Angeles County Fire Department (LACFD) provides firefighting, emergency response, and development review services for the communities in the Project area. As discussed in Chapter 5.15, *Public Services,* of this Draft PEIR, the Project area is served by four fire stations that provide fire and emergency medical services:

- **Station 110** 4433 Admiralty Way, Marina del Rey CA 90292
- **Station 58** 5757 S. Fairfax Avenue Los Angeles, CA 90056
- **Station 38** 3907 W. 54th Street, Los Angeles, CA 90043
- **Station 7** 847 N. San Vicente Blvd., West Hollywood, CA 90069

## Evacuation and Access

Evacuation routes are designated roadways that allow many people to quickly leave an area due to a potential or imminent disaster. These routes should have sufficient capacity to accommodate the needs of the community, be safely and easily accessible, and allow people to travel far enough away to be safe from emergency conditions.

The primary evacuation routes in the Project area include Interstate (I) 405, I-10, and State Route (SR) 90. Evacuation routes within each of the communities in the Project are:

- **Ladera Heights, View Park, and Windsor Hills:** La Cienega Boulevard, Slauson Avenue, La Brea Avenue, Angeles Vista Boulevard, and Stocker Street

- **Westside Islands**
  - **Sawtelle VA:** I-405, Wilshire Boulevard, San Vicente Boulevard
  - **West Fox Hills:** Jefferson Boulevard, Centinela Avenue
  - **Beverly Hills Island:** Ridgecrest Drive
  - **Gilmore Island:** Beverly Boulevard

- **Franklin Canyon.** Franklin Canyon Drive, Lake Drive, Coldwater Canyon Drive
- **Marina del Rey and Ballona Wetlands.** Pacific Coast Highway, SR-90, Fiji Way, Admiralty Way, Via Marina

The County utilizes Ready LA County, an opt-in mass notification system, to provide critical information quickly in a variety of situations, such as severe weather, unexpected road closures, evacuation of buildings or neighborhoods, criminal activity, and emergency preparedness information (County of LA n.d.).

## 5.20.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County practice, a project would normally have a significant effect on the environment if located in or near state responsibility areas or lands classified as very high fire hazard severity zones the project would:

W-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.

W-2 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.

W-3 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.

W-4 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.

## 5.20.3 Environmental Impacts

### 5.20.3.1 METHODOLOGY

The analysis of impacts related to wildfire in this section is based on review of the project description, existing policies, documents, and studies related to wildfire. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the WSAP measures and actions would comply with relevant federal, State, and local laws, ordinances, and regulations.

### 5.20.3.2 PROPOSED PROJECT CHARACTERISTICS AND RELEVANT WSAP GOALS AND POLICIES

#### Land Use Element

**Goal LU 2:** Growth that is sustainable and managed to complement and maintain the character of the existing community.

- **Policy LU 2.1.** Focus growth and the development of new commercial and housing as infill and re-use of commercial corridors and centers, while supporting current businesses, and character of existing residential neighborhoods and preserving parklands and open spaces.

**Goal LU 9:** A safe built environment and infrastructure.

- **Policy LU 9.1.** Ensure that new development is located and designed to protect structures and occupants/users from natural hazards (flooding, landslides, seismic activity, other).

- **Policy LU 9.3.** Proactively manage vegetation in fire hazard areas.

### Conservation and Open Space

**Goal COS 5:** The Westside's scenic resources and natural features are protected from adverse impacts.

- **Policy COS 5.1.** Require that new development respects, integrates with, and complements the natural features of the land, including conforming building massing to topographic forms, restricting grading of steep slopes, and encouraging the preservation of visual horizon lines and significant hillsides as prominent visual features.

### Public Facilities and Services

**Goal PF 3:** Infrastructure and utility systems that provide reliable and equitable services to Westside residents.

- **Policy PF 3.1.** Minimize visual impacts of existing electrical distribution and transmission lines near Slauson Avenue and La Brea Avenue, and other locations, to minimize visual impacts.

## 5.20.3.1 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.20-1: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan? [Threshold W-1]**

**Less Than Significant Impact.** Adopted emergency response plans and emergency evacuation plans include those discussed under Section 4.18.1.1, *Regulatory Framework*, such as County of Los Angeles Operational Area Emergency Operations Plan. The proposed Project could result in a significant impact if it would substantially impair the implementation of this plan. As discussed in Chapter 3, *Project Description*, of this Draft PEIR, implementation of future potential development under the WSAP would be focused in the Ladera Heights, View Park, Windsor Hills, and West Fox Hills communities, a portion of which are on lands within the WUI and Very High FHSZ in the southeastern portion of the Project area. However, none of the 12 Opportunity

Sites[1] that are identified for land use and zoning changes are in the WUI or Very High FHSZ. The proposed Project does not include land use changes or increase densities in the other WSAP communities in the WUI and Very High FHSZ.

Buildout under the WSAP would be located on properties that are already served by the existing roadway network and would not result in substantial changes to the circulation patterns or emergency access routes in the Project area. Additionally, future development under the proposed Project would be required to integrate applicable emergency operation and evacuation requirements as necessary into development to continue its facilitation in evacuation for the people in wildfire-prone areas. Future development, regardless of whether it includes new development or redevelopment, is required to comply with adopted local and State plans and regulations addressing emergency access, response, and evacuation, including the policies under General Plan 2035 Safety Element Goal S 2, Goal S 4, and Goal S 7. Future development in the WUI or Very High FHSZ would be required to comply with the Very High FHSZ Fire Safe Regulations, the CBC, the CFC, and the County Code of Ordinances, which have maximum requirements for lengths of single-access roads, minimum widths of roadways, and vegetation fuel management around roadways.

A temporary impact to emergency response and evacuation under the WSAP could occur from construction of future development projects if they were to result in temporary lane closures that would potentially alter evacuation routes. Potential future development in the Project area would be required to comply with applicable Very High FHSZ Fire Safe Regulations, the CBC, the CFC, and the County of Los Angeles Code of Ordinances. These would be limited to the duration of the construction period, and direct impacts of construction would be evaluated during the permit review process by LACFD and the County Sheriff's Office. Review and approval of temporary lane closures, if needed, for future development projects in the Project area would ensure that that no inconsistencies with emergency evacuation plans would occur.

As described above, the 12 Opportunity Sites within the WSAP are not in Very High FHSZs. Therefore, compliance with local and State requirements and regulations would ensure development accommodated by the WSAP would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

**Impact 5.20-2: Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? [Threshold W-2]**

**Less Than Significant Impact.** As discussed in Section 5.20.1.2, *Existing Conditions*, the Project area is subject to Santa Ana winds in early fall through early spring. These winds have high speeds and can shift suddenly, and they are often accompanied by low humidity. They create dangerous conditions for starting and spreading wildfires during the drier months of the year, and they also spread wildfire smoke hazards, as can prevailing winds. A wildfire combined with Santa Ana winds could expose residents in the area to the uncontrolled spread of wildfire. The topography in wildfire-prone areas of the WSAP including Baldwin Hills is hilly with moderate

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

slopes. Construction of future development projects and activities under the WSAP in these areas may require grading and site preparation activities that could change the slope of a single parcel or site. The proposed Project does not include land use changes to the Inglewood Oil Field, which is subject to a separate planning process and stringent regulations through the BHCSD, which is established to minimize the potential adverse impacts of operations. Future development under the WSAP could exacerbate wildfire risks by adding people to wildfire-prone areas in the Ladera Heights, View Park, and Windsor Hills communities and exposing people in the unincorporated County and surrounding cities to pollutant concentrations from a wildfire. However, potential future development on the identified Opportunity Sites under the WSAP would be in or adjacent to urban and built-out neighborhoods, and the 12 Opportunity Sites are not in the Very High FHSZ (with the exception of the Inglewood Oil Field that is not undergoing land use or zoning changes as part of the WSAP). Additionally, much of the surrounding parkland area is part of the Los Angeles County Fire Department Fire Hazard Reduction Program, which requires clearance of hazardous vegetation to a total distance of 200 feet from any structure (LACFD n.d.).

Section 5.20.1.1, *Regulatory Framework*, describes plans, policies, regulations, and procedures that help to reduce wildfire risks. The 2018 Strategic Fire Plan for California, the County HMP, and the LACFD 2020 Strategic Fire Plan are intended to reduce wildfire hazards and coordinate response to these hazards on a statewide and regional scale. In addition, the South Coast Air Quality Management District provides air quality alerts, advisories, and an interactive online map to view current air quality conditions in the region. Furthermore, all potential future development in the WSAP in a wildfire-prone area would be required to comply with the CBC, CFC, Very High FHSZ Fire Safe Regulations, County Hillside Management Area Ordinance, and grading requirements, which include standards to minimize the ignition and spread of wildfire due to slopes. General Plan Safety Element Policy S 4.7 also discourages the building on midslope, ridgelines, and hilltops without implementing adequate setback on and below slopes to reduce the risk from wildfires.

Other factors, such as vegetation, have the potential to exacerbate wildfire risks. The grassland, brush, and woodland areas of the Ladera Heights, View Park, and Windsor Hills communities can be easily ignited, especially during late summer and fall when temperatures and winds are high and relative humidity is low. During these conditions, woodland vegetation can dry out, particularly in areas with unirrigated vegetation, becoming extremely flammable and increasing wildfire risks.

As described in Section 5.20.1.1, *Regulatory Framework*, the Safety Element of the General Plan and the County HMP contain several vegetation management, fuel reduction, and fuel break policies and programs to reduce the uncontrolled spread of wildfire due to vegetation in both urban and open space areas. Additionally, as stated above, all potential future development in wildfire-prone areas in the WSAP would be required to comply with Very High FHSZ Fire Safe Regulations, Public Resources Code Section 4291, the CFC, and the County Code. These regulations have specific requirements for new and existing development to create defensible space and extensive fuel reduction within 100 feet of a structure, an ember-resistant zone within 5 feet of a structure, and the overall maintenance of properties to reduce the risk of uncontrolled fires or the spread of fires to other properties. Furthermore, the proposed WSAP would include Policy LU 9.3, which requires the proactive management of vegetation in fire hazard areas.

The requirements and regulations listed above would serve to reduce wildfire risks associated with vegetation. The policies and programs would ensure that fire hazard reduction measures occur and are maintained, and that existing and new development in fire-prone areas would incorporate vegetation management measures.

Implementation of the proposed Project could increase population, buildings, and infrastructure in wildfire prone areas in the Project area. The introduction of additional people (through new development and redevelopment) and human activities (including the use of construction equipment) to fire-prone areas inherently exacerbates existing fire hazards. However, potential future development under the WSAP would be concentrated on a limited number of parcels and in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing residential and residential-serving development. Additionally, none of the sites 12 Opportunity Sites identified for land use and zoning changes would be within a Very High FHSZ. Potential future development would be required to comply with local and State laws to reduce wildfire risks and the spread of wildfire. Adherence to the above building practices, fire safety regulations, and vegetation fuel management requirements would reduce the potential for exacerbating wildfire risks. Therefore, impacts would be less than significant.

**Impact 5.20-3: Would the Project 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? [Threshold W-3]**

**Less Than Significant Impact.** Buildout resulting from implementation of the WSAP could require the installation of new roadways, fuel breaks, emergency water sources, power lines, and other utilities to serve future potential development.

- **Roadways.** The proposed Project does not include new roadways in the Very High FHSZ or WUI. Potential future development under the WSAP would be concentrated on a limited number of parcels and in the form of infill/intensification on sites either already developed and/or underutilized, and/or near existing residential and residential-serving development already served by major roadway systems.

- **Fuel Breaks**. As discussed in Section 5.20.3.1, *Proposed Project Characteristics and Relevant WSAP Goals and Policies*, Policy LU 9.3 requires the proactive management of vegetation in fire hazard areas. Additionally, the BHCSD contains specific regulations, monitoring, notification, and outreach requirements governing the operation, maintenance, and decommissioning of the Inglewood Oil Field to ensure that oil field operations minimize potential adverse impacts of operations.

- **Emergency Water Sources**. Future potential development under the WSAP would be required to install emergency water sources that meet minimum State and local regulations for peak load water supply availability.

- **Power Lines**. Potential future development under the WSAP could require electrical line installations and connections to provide power to buildings and infrastructure. The Public Services and Facilities Element of the proposed Project includes Policy PF 3.1, which requires coordination with utility companies to underground existing electrical distribution and transmission lines near Slauson Avenue and La Brea

Avenue, and other locations. Additionally, the CPUC requires maintenance of vegetation around power lines, strict wire-to-wire clearances, annual inspections of aboveground power lines, and the preparation of fire prevention plans for aboveground power lines in high fire-threat districts. These measures would reduce the wildfire risks associated with the installation and maintenance of power lines.

- **Other Utilities**. Potential future development under the WSAP could also require the installation and maintenance of water systems, sewer systems, internet infrastructure, and stormwater systems in wildfire-prone areas.

These types of improvements would involve temporary construction and result in changes to the existing built environment. Any development or redevelopment in the wildfire-prone areas of the WSAP would be required to comply with building and design standards in the CBC and CFC, which include provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. PRC Section 4291 also requires vegetation around buildings or structures to maintain defensible space within 100 feet of a structure and an ember-resistant zone within 5 feet of a structure. These measures, along with the other applicable local and State regulations and the proposed WSAP policies discussed above, would minimize wildfire risks associated with the installation and maintenance of infrastructure.

**Impact 5.20-4 Would the Project 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? [Threshold W-4]**

**Less Than Significant Impact.** Wildfires can create favorable conditions for other hazards, such as flooding and landslides during the rainy season. Wildfires on hillsides can burn the vegetation that stabilizes the slope and create hydrophobic conditions that prevent the ground from absorbing water. This can lead to landslides, debris flows, and flooding. The proposed Project would result in a significant impact if—due to slopes, drainage patterns, or postfire slope instability—it would expose people or structures to significant risks from landsides, debris flows, or flooding.

As discussed in Chapter 5.10, *Hydrology and Water Quality*, of this Draft PEIR, parts of the Project area are in the 100-year and 500-year floodplains. Floodplains in the Project area are primarily associated with the Ballona Creek watershed, which encompasses all or parts of the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, West Hollywood, and unincorporated Los Angeles County. As discussed in Chapter 5.7, *Geology and Soils*, of this Draft PEIR, several landslide hazard zones have been identified in the Project area, most of which lie in hilly areas such as the Santa Monica Mountains and Baldwin Hills, a portion of which lie in the Ladera Heights, Park View, and Windsor Hills communities (USGS 2023). The landslide-prone areas also coincide with Very High FHSZ areas. These areas are considered susceptible to landslides from precipitation and other causes. This overlap could cause areas outside of a flood hazard or landslide-susceptible zone to be affected by runoff, post-fire slope instability, or drainages changes following a wildfire.

As discussed in Chapter 5.10, *Hydrology and Water Quality*, if future developments subject to a discretionary agency approval are proposed within flood hazard zones, then project-specific CEQA analyses would be required. The General Plan discourages development in flood hazard zones, floodplains, or flood prone areas.

If future developments are approved within a flood hazard zone, additional policies have been adopted to require new developments to have access to emergency services and avoid areas where flood-related property damage could impact downstream resources.

As discussed in Chapter 5.7, *Geology and Soils*, Impact Discussion 5.7-1, potential future development under the WSAP on gently sloping topography would be required to comply with the CBC and County Code, which would minimize the potential for slope instability to occur. Additionally, future potential development in Hillside Management Areas would be subject to the County Code Chapter 22.104, Hillside Management Areas, which implements the policies of the General Plan by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design. Further, General Plan Safety Element Policy S 1.3 requires developments to mitigate geotechnical hazards, such as soil instability and landslides, in Hillside Management Areas through siting and development standards.

Future potential development complying with County Code, General Plan Safety Element policies, and the CBC would not expose people or structures to downslope landslides or downstream flooding due to postfire hazards. Furthermore, as identified in discussions of Impact 5.20-1 and Impact 5.20-2, future potential development under the WSAP must also comply with best management practices regarding wildfire prevention, action, and recovery as outlined in the Very High FHSZ Fire Safe Regulations, the CBC, the CFC, the County Code, County HMP, and the LACFD Strategic Fire Plan. All future development, regardless of the location, is required to comply with adopted local, regional, and State plans and regulations addressing wildfire prevention, which would minimize risks of postfire hazards. Compliance with these policies and regulatory requirements would ensure that impacts from postfire instability would be less than significant.

## 5.20.4 Cumulative Impacts

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable probable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself). The cumulative geographic study area used to assess potential cumulative wildfire impacts includes potential future development in WSAP and the surrounding cities and region.

**Impact 5.20-5: Would the Project, when combined with other past, present, or reasonably foreseeable projects substantially impair an adopted emergency response plan or emergency evacuation plan? [Threshold W-1]**

**Less Than Significant Impact.** Potential cumulative impacts on impairing an adopted emergency response plan or emergency evacuation could occur with cumulative development projects in the surrounding region. However, future development outside the WSAP would also be subject to the Very High FHSZ Fire Safe Regulations, the CBC, and the CFC, even if outside of the unincorporated County. Additionally, cumulative development projects would be required to be consistent and comply with local hazard mitigation plans, evacuation plans, and emergency response plans, and be subject to review and approval by local fire and police departments. Similar to future potential development under the WSAP, construction of cumulative

development projects would be limited to the duration of the construction period, and direct impacts of construction would be evaluated during the permit review process. Review and approval of temporary lane closures, if needed, for future development projects in the cumulative Project area would ensure that that no inconsistencies with emergency evacuation plans would occur. Therefore, compliance with local and State requirements and regulations would ensure cumulative development would not substantially impair an adopted emergency response plan or emergency evacuation plan.

**Impact 5.20-6: Would the Project, when combined with other past, present, or reasonably foreseeable projects, 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? [Threshold W-2]**

**Less Than Significant Impact.** Implementation of the WSAP in conjunction with cumulative development projects in the surrounding region could introduce or exacerbate fire risks and could have the potential to contribute to cumulative wildfire risks. None of the 12 Opportunity Sites identified for land use and zoning changes under the WSAP are within a Very High FHSZ. However, such development in or near FHSZs and the WUI could subject people and structures to wildfire hazards. As discussed above, development accommodated by the WSAP would not expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors. As with future potential development under the WSAP, development projects in the surrounding region in a Very High FHSZ or a State Responsibility Area would be subject to the same State and local regulations related to wildfire hazard reduction and would be required to undergo discretionary and CEQA review. These regulations include requirements for building materials, vegetation management, creation and maintenance of defensible space, and grading. Additionally, future potential development under the WSAP would be concentrated in the Ladera Heights, View Park, and Windsor Hills communities, which would be in or adjacent to urban and built-out neighborhoods. Additionally, much of the surrounding parkland area is part of the Los Angeles City Fire Department Brush Clearance Inspection Program, which requires clearance of hazardous vegetation to a total distance of 200 feet from any structure (City of LA n.d.). Therefore, wildfire impacts of the WSAP would not combine with cumulative projects to expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

**Impact 5.20-7: Would the Project, when combined with other past, present, or reasonably foreseeable projects, 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? [Threshold W-3]**

**Less Than Significant Impact.** Future potential development under the WSAP would not exacerbate wildfire risks due to the installation or maintenance of infrastructure. Cumulative development in adjacent jurisdictions would be subject to the same State and local regulations applicable to future projects under the WSAP. As discussed above, any development or redevelopment Very High FHSZs, State Responsibility Areas, and/or the WUI, would be required to comply with building and design standards in the CBC and CFC, which include provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. PRC Section 4291 also requires vegetation around buildings or structures

to maintain defensible space within 100 feet of a structure and an ember-resistant zone within 5 feet of a structure. These measures, along with the other applicable State regulations, would minimize wildfire risks associated with the installation and maintenance of infrastructure.

**Impact 5.20-8 Would the Project, when combined with other past, present, or reasonably foreseeable projects, 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? [Threshold W-4]**

**Less Than Significant Impact.** Future potential development under the WSAP would not cause downslope or downstream post-fire flooding or landslide hazards. As with the WSAP, other development projects in the surrounding region would be subject to the same or similar State and local regulations related to wildfire hazard reduction and would be required to undergo discretionary and CEQA review. As discussed in Chapter 5.7, *Geology and Soils*, Impact Discussion 5.7-9 of this Draft PEIR, cumulative impacts related to landslides were found to be less than significant. Similarly, as discussed in Chapter 5.10, *Hydrology and Water Quality*, Section 5.10.5, *Cumulative Impacts,* of this Draft PEIR, cumulative impacts related to flooding were found to be less than significant. Therefore, the proposed Project would not combine with cumulative projects and would not expose people or structures to significant risk due to downslope or downstream flooding or landslide hazards.

## 5.20.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements, the following impacts would be less than significant: 5.20-1, 5.20-2, 5.20-3, and 5.20-4.

## 5.20.6 Mitigation Measures

No significant adverse impacts related to wildfire were identified and no mitigation measures are required.

## 5.20.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts relating to wildfire have been identified.

## 5.20.8 References

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# 5. Environmental Analysis
## WILDFIRE

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# 6. Significant Unavoidable Adverse Impacts

At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. If the County, as the lead agency, determines that unavoidable significant adverse impacts will result from the proposed Project, the County must prepare a "Statement of Overriding Considerations" before it can approve the proposed Project. A Statement of Overriding Considerations states that the decision-making body has balanced the benefits of the proposed Project against its unavoidable significant environmental impacts and has determined that the benefits of the proposed Project outweigh the adverse effects. Therefore, the adverse effects are considered to be acceptable. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied:

## Air Quality

- **Impact 5.3-2:** Would construction of the Project result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard?

- **Impact 5.3-3:** Would construction of the Project expose sensitive receptors to substantial pollutant concentrations?

## Noise

- **Impact 5.13-1:** 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?

- **Impact 5.13-2:** Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?

## Transportation

- **Impact 5.17-2:** Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

# 6. Significant Unavoidable Adverse Impacts

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# 7. Alternatives to the Proposed Project

## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- "[T]he 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." (15126.6[b])

- "The specific alternative of 'no project' shall also be evaluated along with its impact." (15126.6[e][1])

- "The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (15126.6[e][2])

- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." (15126.6[f])

- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (15126.6[f][1]).

- "Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (15126.6[f][2][A])

- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, "[i]f an alternative would cause…significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

## 7.1.2 Project Objectives

The unincorporated communities of the Planning Area encompass vibrant neighborhoods that collectively recognize and celebrate history, people, diversity, and culture. The proposed Westside Area Plan (WSAP) furthers the efforts to promote active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to foster economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to support sustainable mobility options in an enhanced built environment. As described in Section 3.2 in Chapter 3, *Project Description*, the following objectives have been established for the proposed Project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

- Preserve community character by focusing new housing and commercial development within existing commercial corridors and centers and in proximity to transit, while allowing changes in existing residential neighborhoods consistent with State legislation.

- Provide greater housing choices for residents, consistent with the Housing Element.

- Foster the economic health and prosperity of local businesses by promoting a mix of uses and adaptability of buildings in response to the evolving commercial marketplace, nurturing small businesses, and attracting job opportunities and commercial services that serve local residents.

- Prioritize the development of businesses that serve and are accessible to their neighborhoods and reflect the history and culture of the Westside Planning Area.

- Transform today's automobile dominant land use pattern and densities and improve streetscapes to promote a more active pedestrian environment.

- Promote the inclusion of publicly accessible plazas and courtyards in new commercial and mixed-use development projects where residents can gather, participate in events, and celebrate the history and culture of the community.

- Protect open spaces and natural resources while emphasizing sustainable building practices and implementing infrastructure improvements that are environmentally sensitive and minimize impacts on energy, water, air, and climate.

- Provide a diversity of travel choices by enabling residents to efficiently and safely access destinations throughout the community by walking, biking, using public transit, and emerging forms of transportation.

## 7.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As evaluated throughout Chapter 5, *Environmental Analysis*, of this Draft Program Environmental Impact Report (PEIR), the following impacts related to the proposed Project were determined to be significant and unavoidable after implementation of all feasible mitigation measures.

- **Air Quality** (Construction and Operation) (refer to Section 5.3, *Air Quality*, for a detailed discussion). Significant and unavoidable impacts would occur with implementation of the WSAP, where development facilitated under the WSAP would result in a cumulative considerable net increase in any criteria pollutant for which the WSAP region is nonattainment under applicable federal or State ambient air quality standard; a direct impact related to exposing sensitive receptors to substantial pollutant concentrations; a direct impact related to resulting in other emissions (such as those leading to odors) affecting a substantial number of people; and a cumulatively considerable impact related to resulting in construction or operational emissions that exceed an appliable SCAQUMD recommended significance.

- **Noise** (Construction and Operation) (refer to Section 5.13, *Noise*, for a detailed discussion). Significant and unavoidable impacts would occur with implementation of the WSAP, where development facilitated under the WSAP would result in direct and cumulative impacts related to generating a substantial temporary or permanent increase in ambient noise and vibration levels in the vicinity of the Planning Area in excess of standards established in the local general plan or noise ordinance from construction and operational activities.

- **Transportation** (Operation) (refer to Section 5.17, *Transportation*, for a detailed discussion). Significant and unavoidable impacts would occur with implementation of the WSAP, where development facilitated under the proposed Project would result in direct and cumulative impacts related to inconsistency with State CEQA Guidelines Section 15064.3, subdivision (b).

## 7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The State CEQA Guidelines Section 15126.6(c) recommends that an EIR identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons for their rejection. Among the factors described by State CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in an EIR are failure to meet most of the basic objectives of a project, infeasibility, or inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to a project, State CEQA Guidelines Section 15126.6(t)(l) states that factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

In determining what alternatives should be considered in the Draft PEIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. In determining an appropriate range of Project alternatives to be evaluated in this Draft PEIR, two possible alternatives were initially considered and then rejected in accordance with the criteria established in Section 15126.6(c) of the State CEQA Guidelines. A description of each potential alternative considered but rejected along with the rationale for rejection is provided below.

### 7.3.1 Additional Opportunity Sites for Land Use and Zoning Changes

While the WSAP addresses each of its unincorporated communities, its focus is on Ladera Heights, View Park-Windsor Hills, and West Fox Hills, as the remaining areas are managed through other plans, agencies, or agreements. The Ballona Wetlands is a significant ecological resource owned by the state of California, managed by the California Department of Fish and Wildlife, and subject to an ongoing multiagency restoration project. Determination of Marina del Rey's future uses and improvements will be the subject of a separate planning process recently initiated by the Los Angeles County Department of Beaches and Harbors. The unincorporated area of West LA (Sawtelle VA) is owned by and subject to the jurisdiction of the federal government and is currently undergoing a separate master plan effort. Gilmore Island, a small unincorporated parcel of land in the Fairfax neighborhood of the City of Los Angeles, is occupied by a parking lot integrated cohesively within the overall CBS Television City studio complex. Franklin Canyon is largely undevelopable due to its environmental setting, natural resources, and fire hazards and is mostly used as parkland and trails managed by the Mountains Recreation and Conservation Authority. Therefore, WSAP focuses primarily on land use and zoning changes within Ladera Heights, View Park, Windsor Hills, and West Fox Hills.

During development of the WSAP, the County identified a number of locations—in addition to the 12 Opportunity Sites[1] shown on Figure 3-5, *Opportunity Sites Map*—that might be considered for land use and zoning changes (thereby providing for increased residential density). This included additional opportunity sites (1a, 4c, and 6b), and a larger Opportunity Site 5 (see Figure 7-1, *Additional Opportunity Sites*). Site 1a was at Centinela Avenue/Green Valley Court at the location of an existing storage facility. Site 4c was south of the commercial frontage on Slauson Avenue at Fairfax Avenue at the location of existing church parking lots. Site 6b was the southern part of Site 6 south of Slauson Avenue at Overhill Drive with existing commercial uses. Part of Opportunity Site 5 extended south of Slauson Avenue at Heatherdale Avenue and is developed with commercial uses.

These opportunity sites were shared with the community during a series of public input meetings. Through the WSAP development process, further County consideration of the goals and policies of the WSAP, and as a result of public feedback received, these sites were eliminated from the WSAP as opportunity sites. It was determined through WSAP development that these sites were not necessary in order to accommodate the Regional Housing Needs Assessment (RHNA) allocation or did not otherwise meet criteria defined in the Housing Element, consistent with the Housing Element. In addition, by including these additional opportunity sites, this alternative would result in greater significant environmental impacts related to air quality, noise, and transportation.

Although the Additional Opportunity Sites Alternative would generally meet the objectives of the proposed Project, for the reasons listed above, the Additional Opportunity Sites Alternative was considered but rejected from further evaluation within this Draft PEIR.

### 7.3.2 Reduced Density Below Housing Element/Regional Housing Needs Assessment

The County considered an alternative that would reduce the amount of residential dwelling units below the Regional House Needs Assessment (Reduced RHNA Density Alternative) allocation. A reduction in dwelling units that would be facilitated by the WSAP would be an appropriate means of reducing significant impacts. All identified significant and unavoidable impacts of the WSAP (air quality, noise, and transportation) would be incrementally reduced by a reduction in housing unit capacity at buildout of zoning code.

However, a potential alternative that would diminish the capacity of the Planning Area to accommodate housing units was determined to be infeasible because implementation of the Housing Element and RHNA requirements is mandated by the State of California and must be implemented. The California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's council of governments (COG), which is the Southern California Association of Governments (SCAG) for the County of Los Angeles. HCD starts with demographic population information from the California Department of Finance and uses a formula to

[1] The Inglewood Oil Field is identified as an Opportunity Site in the WSAP; however, land uses would continue to be governed by the BHCSD, and no land use and zoning changes are proposed as part of the WSAP. Any future changes would be conducted under a separate planning process.

calculate a figure for each region of the State. Once HCD and the COG have agreed to a region's assessment figure (the amount of housing that must be planned for), the COG takes over and is responsible for allocating the housing needs amongst all the jurisdictions (cities/counties) within that region. The COG does this in a RHNA Plan. All jurisdictions are required to plan for their RHNA allocation, and there are penalties from the State for not accommodating the required allocation of housing SCAG provides one RHNA for all unincorporated areas. Therefore, the amount of housing anticipated through the implementation of the WSAP would satisfy the requirement of the Housing Element/RHNA and cannot be feasibly reduced, even if such reductions would reduce or eliminate significant environmental impacts.

For the reasons listed above, the Reduced RHNA Density Alternative was considered but rejected from further evaluation within this Draft PEIR.

## 7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the project but that may avoid or substantially lessen any of the significant effects of the proposed Project. These alternatives are analyzed in detail in the following sections.

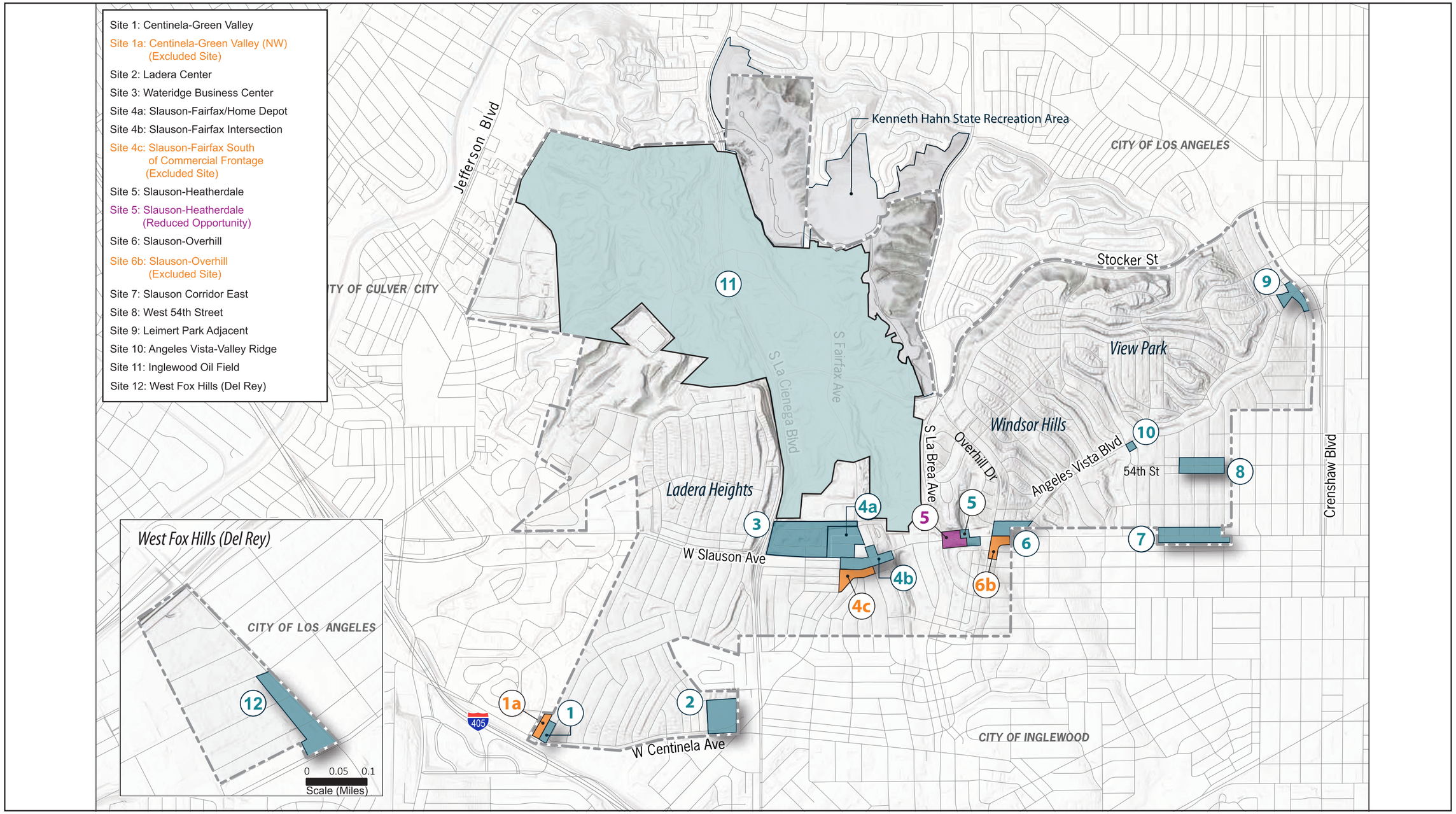
- No Project/Existing General Plan Alternative
- Housing Element Residential Units Only Alternative
- No Commercial Rezone or Land Use Change Alternative

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. Section 7.7 identifies the Environmentally Superior Alternative. The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this DEIR.

### 7.4.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the four land use alternatives, including the proposed Project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but provide a buildout scenario that would only occur if all the areas of the Planning Area were to develop to the probable capacities yielded by the land use alternatives.

## Figure 7-1 - Additional Opportunity Sites




*Source: County of Los Angeles 2024; PlaceWorks 2024.*

# 7. Alternatives to the Proposed Project

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## 7.5 NO PROJECT/BUILDOUT TO GENERAL PLAN ALTERNATIVE

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the State CEQA Guidelines, the purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As specified in Section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the No Project/Buildout to General Plan Alternative (No Project, Alternative 1) will be the continuation of the plan, policy, or operation into the future. Therefore, the No Project Alternative, as required by the State CEQA Guidelines, would analyze the effects of not adopting and implementing the WSAP.

Future development under the No Project Alternative would continue to be guided by the County's existing General Plan land use and the recently adopted Housing Element Update; however, no specific land use or zoning designations were approved as part of that process. The No Project Alternative would result in the continuation of existing conditions (7,735 existing households) and planned development within the Planning Area (567 households). As shown in Table 7-1, *Existing Planning Area Conditions (2024)*, the Planning Area currently has 7,735 households, 18,270 residents, and 4,585 jobs. No land use or zoning amendments would be processed under this alternative. As shown in Table 7-2, *Alternative 1 Buildout Projections (2045)*, Alternative 1 would result in a planned buildout total of approximately 8,302 households, 20,022 residents, and 4,687 jobs in the Planning Area by 2045, consistent with the existing General Plan and land use designations.

**Table 7-1 Existing Planning Area Conditions (2024)**

| | Households | Population | Jobs |
|---|---|---|---|
| Ladera Heights, View Park, and Windsor Hills | 7,516 | 17,814 | 4,222 |
| West Fox Hills | 219 | 456 | 363 |
| **Total** | **7,735** | **18,270** | **4,585** |

Source: (DRP 2023)

**Table 7-2 Alternative 1 Buildout Projections (2045)**

| | Households | Population | Jobs |
|---|---|---|---|
| Ladera Heights, View Park, and Windsor Hills | 8,079 | 19,585 | 4,546 |
| West Fox Hills | 223 | 437 | 141 |
| **Total** | **8,302** | **20,022** | **4,687** |

Source: (Fehr & Peers 2024)

As shown in Table 7-3, *Existing Planning Area Conditions (2024) and Alternative 1 Buildout Projections (2045)*, buildout of the Planning Area consistent with the General Plan would result in a net increase in households by 567 households and increase in population by 1,752 residents. It should be noted that current employment exceeds the projected employment for the area by 102 employees. The West Fox Hills community is currently exceeding employment expectations; Alternative 1 would not eliminate jobs from the Planning Area.

**Table 7-3 Existing Planning Area Conditions (2024) and Alternative 1 Buildout Projections (2045)**

| | Existing Planning Area Conditions | Alternative 1 Buildout Conditions | Change |
|---|---|---|---|
| Households | 7,735 | 8,302 | **567** |
| Population | 18,270 | 20,022 | **1,752** |
| Employment | 4,585 | 4,687 | **102** |

As shown in Table 7-4, *Proposed Project Buildout Conditions (2045)*, the Project would result in a buildout total of 14,791 households, 35,726 residents, and 5,297 jobs in the Planning Area by 2045.

**Table 7-4 Proposed Project Buildout Projections (2045)**

| | Households | Population | Jobs |
|---|---|---|---|
| Ladera Heights, View Park, and Windsor Hills | 14,365 | 34,796 | 5,156 |
| West Fox Hills | 426 | 930 | 141 |
| **Total** | **14,791** | **35,726** | **5,297** |

Source: (Fehr & Peers 2024)

As shown in Table 7-5, *Alternative 1 Buildout and Proposed Project Buildout Conditions Comparison (2045)*, buildout of the Planning Area under proposed Project conditions as compared to Alternative 1 would result in a net increase in housing units by 6,757 units, yielding 6,489[2] households and increase population by 15,704 residents. The Project would result in an increase in employment by 610 employees as compared to Alternative 1. It should be noted that current (2024) employment exceeds the General Plan projected employment for the area by 305 employees.

**Table 7-5 Alternative 1 Buildout and Proposed Project Buildout Conditions Comparison (2045)**

| | Alternative 1 Buildout Conditions | Proposed Project Buildout Conditions | Change |
|---|---|---|---|
| Households | 8,302 | 14,791 | **6,489** |
| Population | 20,022 | 35,726 | **15,704** |
| Employment | 4,687 | 5,297 | **610** |

## 7.5.1 Aesthetics

As discussed in Section 4.1, *Aesthetics*, implementation of the proposed Project would result in less than significant impacts related to aesthetics.

Future development under Alternative 1 would continue to be guided by the General Plan land use and zoning designations, where development would be consistent with current County plans, policies, and regulations regarding aesthetics. If future development under this alternative proposes increased building

[2] Based on the unincorporated Los Angeles County occupancy rate of 96 percent.

heights or a variance in building form or visual character, the County would require such projects to demonstrate their consistency with existing plans, policies, and regulations related to aesthetics on a project-by-project basis and would require each project to obtain all applicable discretionary permits to ensure visual and aesthetic impacts are reduced to a less than significant level during the project entitlement process. Therefore, Alternative 1 would not result in impacts related to aesthetics as there would be no change to scenic resources or the visual landscape in the Planning Area other than what is currently allowable under existing land use and zoning designations. For these reasons, Alternative 1 would result in less than significant impacts related to aesthetics, similar to the proposed Project.

While Alternative 1 would reduce Project impacts to aesthetics, this Alternative would not implement the goals and policies relevant to aesthetics and visual quality, which would preserve community character and reflect the history and culture of the Planning Area. Moreover, Alternative 1 would not include the policies, goals, and implementing actions of the WSAP related to the protection of open space and natural resources. Since development under Alternative 1 would not be subject to these goals and policies of the overarching WSAP, this Alternative would not provide the same benefits as the Project nor achieve the Project Objectives.

### 7.5.2 Agriculture and Forestry Resources

As discussed in Section 5.2, *Agriculture and Forestry Resources*, the Planning Area is designated as Urban and Built-Up Land. The proposed Project would not convert agricultural land as there is no land designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. Additionally, there are no areas within the Planning area that are zoned as forestry or for timberland production. Therefore, no impacts to agriculture and forestry under the Project would occur.

Under Alternative 1, redevelopment would occur in the same areas as the proposed Project but would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Since development would occur in accordance with the current land use and zoning designation, conversion of agricultural land, farmland, or forestry land would not occur under this alternative. As with the proposed Project, Alternative 1 would not include the rezoning of agricultural zones or forestry zones. Therefore, Alternative 1 would result in no impacts to agriculture and forestry resources, similar to the proposed Project.

### 7.5.3 Air Quality

As discussed in Section 5.3, *Air Quality*, adoption of the WSAP would not conflict with any applicable air quality plan, policy, or regulation and therefore impacts would be less than significant. Implementation of the Project would result in significant and unavoidable impacts with respect to a cumulatively considerable net increase of a criteria pollutant for which the region is nonattainment under an applicable federal or State ambient air quality standard; the exposure of sensitive receptors to substantial pollutant concentrations during construction and operations due to future development projects facilitated by adoption of the WSAP generating substantial emissions in proximity to sensitive receptors; generating odors during construction and operation; and a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard.

Under Alternative 1, development and growth would continue to occur in the same areas as the Project but would be in accordance with existing zoning and land use designations. Since the WSAP would not be adopted as the guiding land use and zoning document for the Planning Area, future development would be proposed and evaluated for environmental impacts on a project-by-project basis during the project entitlement process. During their individual approval/environmental review process, potential air quality impacts would be identified and compared against relevant thresholds to determine significance. It is reasonable to assume that since future development under this Alternative would be consistent with the County's General Plan land use and zoning designations, future projects would also demonstrate consistency with the applicable air quality plans, policies, and regulations as those projects would result in growth already accounted in SCAG's regional growth projections for within the Planning Area. Therefore, impacts with conflicting with applicable air quality plans, policies, and regulations would be less than significant under Alternative 1, similar to the Project.

In regard to the Project's significant and unavoidable impacts to the thresholds listed above, development facilitated under Alternative 1 would also have the potential to result in similar impacts. Under Alternative 1, development would occur in accordance with existing zoning and land use designations as the WSAP would not be adopted. Even though future development would be consistent with the existing land use and zoning designations, future projects' potential to impact air quality would be determined on a site-by-site basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as appropriate. Future development would be subject to any applicable discretionary permits made on a case-by-case basis, and all would be required to comply with all federal, State and local requirements relevant to air quality. Since development under Alternative 1 would be governed by the General Plan, future projects would be subject to all applicable General Plan mitigation measures identified for air quality as well as project-specific mitigation measures to reduce potential impacts. Even with incorporation of all applicable mitigation measures, obtaining all discretionary permits, and compliance with federal, State and local requirements, it is speculative at this time to assume that all future projects would be able to reduce their impacts to air quality to a less than significant level under Alternative 1. Therefore, impacts to air quality under Alternative 1 would remain significant and unavoidable, similar to those identified for the Project.

### 7.5.4 Biological Resources

As discussed in Section 5.4, *Biological Resources*, the proposed Project, as a result of development facilitated by the WSAP, would result in less than significant impacts to biological resources.

Under Alternative 1, development would occur in the same areas as the Project, which are developed with commercial uses, but in accordance with the existing zoning and land use designations as the WSAP would not be adopted. Even though future development would be consistent with the existing land use and zoning designations, future projects' potential to impact biological resources would be determined on a site-by-site basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA. Future development would be subject to applicable discretionary permits as appropriate, and would be required to comply with all federal, State, and local requirements for protecting biological resources. Since development under Alternative 1 would be governed by the General Plan, future projects would be subject to all applicable General Plan mitigation measures and County ordinance

requirements for biological resources as well as project specific mitigation measures, as applicable, to reduce potential impacts. Therefore, impacts to biological resources under Alternative 1 would be less than significant, similar to those identified for the Project.

### 7.5.5 Cultural Resources

As discussed in Section 5.5, *Cultural Resources*, the proposed Project, as a result of development facilitated by the WSAP, would result in less than significant impacts to cultural resources, including historical and archaeological resources and human remains after incorporation and implementation of Mitigation Measures CUL-1 through CUL-7.

Under Alternative 1, development would occur in the same areas as the Project but would be in accordance with existing zoning and land use designations as the proposed WSAP would not be adopted. Although future development would be consistent with the existing land use and zoning designations, future projects' potential to impact cultural resources would be determined on a site-by-site basis and would be evaluated during their individual approval and environmental review processes in accordance with CEQA, as appropriate. Since a project's potential to impact cultural resources is site dependent, future development under this Alternative would have the same potential to impact cultural resources as the proposed Project. Future development under this Alternative would also be required to comply with all federal, State, and local requirements for protecting cultural resources. Similar to the Project, individual projects under Alternative 1 would also be required to incorporate and implement all feasible mitigation measures to reduce impacts to cultural resources, which could include but would not be limited to the same mitigation measures identified for the Project. Therefore, with mitigation measures incorporated, Alternative 1 would result in less than significant impacts to cultural resources. Impacts under this Alternative would be similar to those identified for the proposed Project.

### 7.5.6 Energy

As discussed in Section 5.6, *Energy*, future development implemented under the WSAP would result in less than significant impacts with respect to energy. Under Alternative 1, future development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. While future development projects would be constructed and operated in accordance with existing land use and zoning designations, these activities would still be regulated by the same laws, regulations, plans, and policies related to energy use and savings as the proposed Project. Compliance with the existing energy laws, regulations, plans, and policies would mandate that future projects incorporate similar energy efficiency and saving designs and strategies for both the construction and operation phases.

Therefore, future projects developed under Alternative 1 would result in less than significant impacts related to energy. However, Alternative 1 would not target future growth around transit centers or along valued transit corridors and therefore, would not aid in reducing VMT or air quality or GHG emissions by clustering higher residential densities with commercial and alternative transportation uses. The Project's benefit of driving transit-oriented development would not be achieved under this Alternative and as such, the energy efficiency and saving designs and strategies contained in the WSAP would not be able to be applied uniformly

across the Planning Area. Thus, while both Alternative 1 and the proposed Project would result in less than significant impacts related to energy, the Project would result in less severe impacts with respect to energy.

### 7.5.7 Geology and Soils

As discussed in Section 5.7, *Geology and Soils*, the proposed Project, as a result of development facilitated by the WSAP ,would result in less than significant impacts related to geology and soils after incorporation and implementation of Mitigation Measures GEO-1 through GEO-3.

Under Alternative 1, development would occur in the same areas as the proposed Project but would be in accordance with existing zoning and land use designations as the proposed WSAP would not be adopted. Although future development would be consistent with the existing land use and zoning designations, future projects' potential to impact cultural resources would be determined on a site-by-site basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Since a project's potential to impact geology and soils is site dependent, future development under this Alternative would have the same potential to impact geology and soils as the proposed Project. Future development under this Alternative would also be required to comply with all federal, State, and local requirements related to building safety. Similar to the proposed Project, individual projects under Alternative 1 would also be required to incorporate and implement all feasible mitigation measures to reduce impacts to paleontological resources, which could include but would not be limited to the same mitigation measures identified for the proposed Project. Therefore, with mitigation measures incorporated, Alternative 1 would result in less than significant impacts related to geology and soils. Impacts under this Alternative would be similar to those identified for the proposed Project.

### 7.5.8 Greenhouse Gas Emissions

As discussed in Section 5.7, *Greenhouse Gas Emissions*, the County, as lead agency, has determined that the WSAP's contribution to cumulative GHG emissions and global climate change would be less than significant if the WSAP is consistent with the applicable regulatory plans and policies to reduce GHG emissions: 2022 Climate Change Scoping Plan, SCAG's 2024–2050 RTP/SCS, and 2045 CAP. Given that the Project would not conflict with applicable GHG reduction plans, policies, and regulations, emissions associated with future development facilitated by adoption of the WSAP would be less than significant.

Under Alternative 1, development would occur in the same areas as the Project but would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Even though future development would be consistent with the existing land use and zoning designations, future projects' potential to generate GHG emissions would be dependent on the construction and operation characteristics of individual projects, where impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Similar to the proposed Project, if future development under Alternative 1 could demonstrate consistency with applicable GHG reduction plans, policies, and regulations, then impacts related to GHG emissions would be considered to be less than significant. Impacts under this Alternative would be similar to those identified for the proposed Project.

### 7.5.9 Hazards and Hazardous Materials

As discussed in Section 5.9, *Hazards and Hazardous Materials*, adoption of the proposed Project would result in less than significant impacts. Adoption of the WSAP, as a long-term planning document for the Westside Planning Area, would not alter the existing General Plan polices or regulations or create additional goals, policies, and regulations that would impact fire protection and emergency services. Therefore, impacts associated with impeding or interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Although future development would be consistent with the existing land use and zoning designations, future projects' potential to create hazards or use hazardous materials would be dependent on the construction and operation characteristics of individual projects, where impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Future projects implemented under Alternative 1 would be required to be evaluated on a site-by-site basis for its impacts related to this criteria.

Compliance with existing regulations, plans, and policies would ensure that future projects' impacts related to creating a hazard or using hazardous materials are minimized to the greatest extent feasible. Furthermore, during the future approval/environmental review processes, future projects would be required to demonstrate consistency with the County's emergency and/or evacuation plans and incorporate mitigation if it was determined that the project was inconsistent. With the incorporation of all applicable mitigation measures, obtaining all discretionary permits, and compliance with federal, State and local requirements, impacts related to hazards and hazardous materials under Alternative 1 would be less than significant. Impacts under this Alternative would be similar to those identified for the proposed Project.

### 7.5.10 Hydrology and Water Quality

As discussed in Section 5.9, *Hydrology and Water Quality*, adoption of the WSAP, either directly or as a result of future projects facilitated by the WSAP, would not interfere with groundwater supplies or recharge and would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts related to groundwater supplies or recharge; substantially degrading water quality; and conflicting with a Groundwater Sustainability Plan would be less than significant.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Even though future development would be consistent with the existing land use and zoning designations, future projects' potential to impact water quality, groundwater supplies or recharge, and conflict with applicable surface- and groundwater plans would be dependent on the construction and operation characteristics of individual projects and individual project sites. Future projects' impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA.

While future development under this Alternative could occur anywhere within the General Plan jurisdiction, including undeveloped or nonurban areas, compliance with all applicable regulations, plans, and policies,

including the California Building Code (CBC) and County Municipal Code, would reduce impacts to hydrology and water quality to the greatest extent feasible. In addition to regulatory compliance, standard mitigation measures in combination with best management practices (BMPs) would be adequate to further reduce future projects' impacts to a less than significant level, similar to the Project. As with the proposed Project, future projects facilitated under Alternative 1 would be required to comply with applicable CBC requirements to account for potential groundwater use and implement appropriate water conservation measures. Therefore, impacts to water quality, groundwater supplies or recharge, and conflict with applicable surface- and groundwater plans would be less than significant, similar to the Project.

### 7.5.11 Land Use and Planning

As discussed in Section 5.11, *Land Use and Planning*, adoption of the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation as the WSAP land use goals and policies are consistent with the General Plan and other regional land use plans adopted to avoid or mitigation impacts on the natural or built environment. No inconsistent policies were identified, nor were any proposed WSAP policies found to potentially conflict with the intent of regional plans or preclude the attainment of regional plans' primary goals. Therefore, implementation of the WSAP would result in a less than significant impact.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Since development would occur in accordance to the current land use and zoning designation, future development projects under Alternative 1 would not conflict with the General Plan, Local Coastal Program (LCP), or other regional land use plans adopted to avoid or mitigation impacts on the natural or built environment. All future development under this Alternative would occur with existing land use and zoning designations and would be developed as currently planned in the General. Therefore, impacts related to conflict with the intent of regional plans or preclude the attainment of regional plans' primary goals would be less than significant under Alternative 1, similar to the Project.

However, while Alternative 1 would result in similar impacts as the Project, development facilitated under this Alternative would not be subjected to the WSAP benefits of promoting active, healthy, and safe intergenerational neighborhoods where residents are well connected to great places to live, work, shop, recreate, and gather; to fostering economic vitality while serving local needs; to protect and preserve natural resources and open spaces; and to supporting sustainable mobility options in an enhanced built environment. Thus, while the severity of impacts would be similar between Alternative 1 and the Project, this Alternative would not create any of the benefits of the Project in the Planning Area.

### 7.5.12 Mineral Resources

As discussed in Section 5.12, *Mineral Resources*, adoption of the Project would not cause a significant environmental impact on mineral resources. The areas identified for future development guided by the proposed Project are in urbanized areas of the Planning Area and are not identified for mining. Therefore, implementation of the WSAP would result in no impacts.

Under Alternative 1, development would occur in the same areas as the Project but would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. These areas are not identified as being within a mineral resource zone or designated as a mineral recovery site by the County's General Plan. Since development would occur in accordance to the current land use and zoning designations, future development under Alternative 1 would not result in the loss or availability of a known mineral resource or loss of a mineral resource recovery site, similar to the Project.

### 7.5.13 Noise

As discussed in Section 5.13, *Noise*, development facilitated by the WSAP would have the potential to result in significant noise and vibration levels during construction and operation. Mitigation measures N-1 would be implemented to reduce construction noise levels to the greatest extent feasible. However, because of the potential for construction activities to occur near sensitive uses, and because of the potential intensity of construction activities, it may not be feasible to reduce the impact to a less-than-significant level, and the impact would remain significant and unavoidable. To reduce vibration impacts from a construction site could be achieved with the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as a typical land use development project (Caltrans 2020). However, mitigation measure N-3 would be implemented to reduce the severity of temporary vibration impacts from on-site construction. However, even with implementation of mitigation measure N-3, vibration impacts from construction activities would be significant and unavoidable.

In addition, development facilitated by the WSAP would have the potential to result in significant noise levels during operation. Mitigation Measure N-2 would be implemented to reduce stationary noise levels to the greatest extent feasible. However, even with implementation of Mitigation Measure N-2, exterior noise levels may still exceed the County's noise land use compatibility criteria despite exterior noise attenuation (i.e., noise controls, sound walls, and/or berms). Each future discretionary project within the Planning Area would be required to conduct a CEQA analysis on a case-by-case basis as it is proposed, which would determine the level of significance based on each individual discretionary project's specific noise-generating components, including a project's contribution to offsite traffic noise. It is noted that the mitigation of traffic source noise impacts can be difficult in that lead agencies have limited remedies at their disposal to effectively reduce traffic-related noise. Thus, operation noise impacts would remain significant and unavoidable.

Under Alternative 1, development would occur in the same areas as the Project but would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Even though future development would be consistent with the existing land use and zoning designations, future projects' potential to generate excessive noise and vibration levels during construction and operation would be dependent on the construction and operation characteristics of individual projects and individual project sites. Noise and vibration impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. If development projects can demonstrate compliance with the County's established noise and vibration thresholds, with or without mitigation measures incorporated, then impacts related to noise and

vibration would be considered to be less than significant. However, since the timing, intensity, surrounding uses, and design of future development permitted under Alternative 1 is unknown at this time, it would be speculative at this time to assume that all future projects under Alternative 1 would be able to reduce their noise and vibration levels below established thresholds during construction and operation, even with mitigation measures incorporated. Therefore, noise and vibration impacts would remain significant and unavoidable under Alternative 1, which would be similar impacts as those identified for the Project.

### 7.5.14 Population and Housing

As discussed in Section 5.14, *Population and Housing*, while implementation of the WSAP would result in increases in density and development intensity which could result in population growth, this growth would not be unplanned and would be consistent with existing SCAG regional planning documents' assumptions regarding population growth. Furthermore, implementation of the WSAP would not result in the direct displacement of Planning Area residents or housing. Potential displacement impacts associated with individual proposed development projects in the Planning Area would be analyzed and, if required, mitigated in accordance with CEQA. Therefore, impacts related to unplanned growth and displacement would be less than significant.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Since development would occur in accordance with the current land use and zoning designation, development under Alternative 1 would not generate new unplanned population growth or increased commercial opportunities outside of what was projected in the County's General Plan. Therefore, impacts related to unplanned population growth and removal of housing causing displacement would be less than significant under Alternative 1, similar to the Project. However, the severity of impacts would be less under this Alternative than the Project because implementation of Alternative 1 would not increase residential and commercial densities around transit centers and high-quality transit areas (HQTA), and in turn, would not encourage development to the extent of the proposed Project. Thus, population growth under this Alternative would continue as in existing conditions and would occur slower than under the proposed Project.

While growth would occur slower under Alternative 1, this Alternative would not foster smart transit-oriented growth within the Planning Area and would not provide the benefits of the Project. A goal of the WSAP is to preserve community character by focusing new housing and commercial development within existing commercial corridors and centers and in proximity to transit, while allowing changes in existing residential neighborhoods consistent with State legislation. Since Alternative 1 would not include implementation of the policies and goals of the WSAP, it is uncertain at this time if residential development would be provided in pace with the growing Planning Area population under Alternative 1. If residential development is not provided in pace with population growth under this Alternative, housing shortages could occur, which in turn could dissuade new residents from moving to the Planning Area or could cause some existing residents to move away. Therefore, while this Alternative would not result in the same rate of growth as the Project, it also would not develop new residential units at the same rate as the proposed Project. Thus, the proposed Project's benefits to the housing market would not be achieved under Alternative 1. Therefore, impacts associated with population and housing would be less than significant, similar to the proposed Project.

### 7.5.15 Public Services

As discussed in Section 5.15, *Public Services*, adoption of the WSAP would not directly increase demand on the existing police and fire protection services, schools, or libraries as the WSAP is a policy document and would not build new housing that results in direct population increases. However, the WSAP could indirectly increase demand on these public services as the Project proposes changes to land use and zoning designation that would create higher density residential areas, which would allow for construction of additional units and therefore result in indirect population growth. All development facilitated by the WSAP would be consistent with the policies related to public services of the Plan and other applicable regional planning documents. In addition, all development projects would be required to pay all applicable development fees and various taxes to fund these public services. Payment of development fees and taxes would provide funds to these public services to provide additional personnel and/or equipment and/or expand existing facilities to support the population growth indirectly caused by the Project. Therefore, impacts associated with public services would be less than significant.

Under Alternative 1, development would occur in the same areas as the Project but would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Higher residential densities would not occur under Alternative 1 and all residential development would continue to occur as currently planned where population growth within the Planning Area would continue as projected by the General Plan and LCP, which would occur at a slower rate than under the Project. Similar to the Project, all future development would also be required to pay all applicable development fees and taxes to support funding of public services in time as development occurs. In addition, all future development would be required to demonstrate consistency with the policies and processes related to public services contained in the County General Plan and other applicable regional planning documents. Therefore, impacts to public services would be less than significant under Alternative 1, similar to the proposed Project.

### 7.5.16 Recreation

As discussed in Section 5.16, *Recreation*, implementation of the WSAP as a programmatic document directing future growth and development in the Planning Area 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; result in the construction or expansion of recreational facilities which might have an adverse effect on the environment; or interfere with regional trail connectivity. Development facilitated by the Project would be required to adhere to all applicable regulations, including the Quimby Act, Los Angeles County Code Section 21.24.340, Housing Element Program 23, if adopted, and WSAP policies to ensure local parkland would be provided through funding or dedication proportional to future growth and development associated with the proposed land uses and zoning changes of the WSAP. For these reasons, impacts related to recreation would be less than significant.

Under Alternative 1, development would occur in the same areas as the proposed Project but would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Higher residential densities would not occur under Alternative 1 and all residential development would continue to occur as currently planned where population growth within the Planning Area would continue as projected by

the County General Plan and Communities Plans. Under this Alternative, future development projects would be required to undergo project-specific analysis under CEQA and would be required to either provide a dedication of adequate parkland or pay an in-lieu park and recreation facilities impact fee as a condition of approval for compliance with the Quimby Act and Area Plan standards. At the project-level, dedication of adequate parkland or pay an in-lieu park and recreation facilities impact fee would be sufficient in reducing project impacts to recreation to a less than significant level. Thus, impacts to recreation under Alternative 1 and the Project would be similar.

However, because Alternative 1 does not involve implementation of the WSAP or other targeted growth plan for the Planning Area, this Alternative cannot guide the development of additional parks and recreational facilities within the Planning Area, which is currently deficient in providing adequate local parkland and recreation facilities. Therefore, while the severity of impacts would be similar between this Alternative and the Project, this Alternative would not create the recreational benefits of the proposed Project.

### 7.5.17 Transportation

As discussed in Section 5.17, *Transportation*, implementation of the WSAP would not result in inconsistencies with applicable plans addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities nor substantially increase hazards due to a design feature or incompatible uses or result in inadequate emergency access. Impacts associated with these thresholds would be less than significant. However, due to development facilitated by the WSAP, increase in service population anticipated from buildout in the 2045 with Project scenario, and land uses within the Planning Area compared to the Countywide average, the Project would result in significant and unavoidable impacts related to increases in VMT, even after incorporation of Mitigation Measures T-1 and T-2.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Higher residential densities would not occur under Alternative 1 and all residential development would continue to occur as currently planned where population growth within the Planning Area would continue as projected by the General Plan and LCP. Even though future development facilitated under this Alternative would be consistent with the existing land use and zoning designations, future projects' potential to impact transportation would be dependent on the construction and operation characteristics of individual projects. Transportation impacts, especially VMT, would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Future development would be required to comply with all federal, State, and local requirements related to transportation.

Since development under Alternative 1 would be governed by the General Plan, future projects would be subject to all applicable County requirements and General Plan mitigation measures identified for transportation, as well as project-specific mitigation measures to reduce potential impacts, as appropriate. Even with incorporation of all applicable mitigation measures and compliance with federal, State, and local requirements, it is speculative at this time to assume that all future projects would be able to reduce their impacts to transportation to a less than significant level under Alternative 1. Therefore, impacts to transportation under Alternative 1 would remain significant and unavoidable, similar to those identified for

the Project. While impacts to transportation would be similar under Alternative 1 and the Project, this Alternative would not increase higher density development within major commercial corridors and centers and high-quality transit corridors within the Planning Area, which would encourage use of alternative transit services and help to reduce Countywide VMT. Furthermore, Alternative 1 would not provide additional policies, plans, and implementation actions to help develop the Planning Area as a whole as a way to reduce conflicting transportation decisions and VMT while also increasing walkability and usage of alternative transportation.

While this Alternative would not change land use and zoning designations to accommodate higher residential densities around transit areas, the difference in population growth between this Alternative and the Project does not directly outweigh the missed benefits of the Project under this Alternative. Therefore, without the policies, plans, and implementation actions of the WSAP guiding transportation decisions across the Planning Area, it is reasonable to assume that impacts related to transportation would be more severe under this Alternative than those identified for the Project.

### 7.5.18 Tribal Cultural Resources

As discussed in Section 5.18, *Tribal Cultural Resources*, implementation of the WSAP would result in less than significant impacts to tribal cultural resources, given compliance with Assembly Bill (AB) 52, which requires the County to consult with California Native American tribes to identify tribal cultural resources that could be impacted by a project facilitated by the WSAP for those projects requiring discretionary review under CEQA where applicable. If a tribal cultural resource is identified as a result of consultation, the measure requires that the County implement project-specific mitigation measures or consider alternatives capable of avoiding or minimizing significant impacts to the tribal cultural resource. Additionally, Mitigation Measures CUL-2 through CUL-6 (see Section 5.5, *Cultural Resources*) require, among other things, archaeological monitoring and Native American and preparation of a plan for the treatment of archaeological resources, including those that may also qualify as tribal cultural resources, which would further reduce the impact.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Even though future development would be consistent with the existing land use designations and zoning designations, future projects' potential to impact tribal cultural resources would be determined on a site-by-site basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Since a project's potential to impact tribal cultural resources is site-dependent, future development under this Alternative would have the same potential to impact tribal cultural resources as the proposed Project. Future development under this Alternative would also be required to comply with all federal, state, and local requirements for protecting cultural resources, including conducting tribal consultation in accordance with AB 52, as necessary, prior to approving a project. Similar to the proposed Project, individual projects under Alternative 1 would also be required to incorporate and implement all feasible mitigation measures to reduce impacts to tribal cultural resources, which could include but would not be limited to the same mitigation measures identified for the proposed Project. Therefore, with mitigation measures incorporated, Alternative 1 would result in less than significant impacts to tribal cultural resources. Impacts under this Alternative would be similar to those identified for the Project.

## 7.5.19 Utilities and Service Systems

As discussed in Section 5.19, *Utilities and Service Systems*, since the WSAP would not induce regional population growth beyond SCAG projections, regional utilities would accommodate the local increases without increasing overall regional demand projections for all existing utilities and service systems. Therefore, impacts would be less than significant.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Similar to the Project, development under Alternative 1 would not induce population growth beyond SCAG's projections as development would be guided by the existing County General Plan and Community Plans. Therefore, development would continue as in existing conditions, and demand on utilities would incrementally increase in proportion to SCAG's population growth projections, which would ensure that utility providers would be able to continue to serve the Planning Area. Therefore, impacts to utilities and service systems would be less than significant, similar to the Project.

While growth under Alternative 1 would occur at a slower rate than projected for the Project, which would in turn reduce future demands on existing utility and service systems, the reduction in development would also reduce the amount of development fees the utility providers could use to provide additional services. For this reason, the severity of impacts associated with Alternative 1 would be similar as the Project since the slower growth balances out the reduction in available development fees used to provide for additional services.

## 7.5.20 Wildfire

As discussed in Section 5.20, *Wildfire*, portions of Ladera Heights, View Park, Windsor Hills, and Marina del Rey are identified as being within very high fire hazard severity zone (VHFHSZ) and a wildland-urban interface (WUI). While adoption of the WSAP would allow for greater intensities than previously permitted in the unincorporated areas of the County, the existing regulatory setting, the goals and policies in the General Plan, and general location of the areas where land use and zoning changes are to occur within the Opportunity Sites are within urban areas that are not within a WUI or VHFHSZ, which would ensure that potential impacts to emergency response associated with implementation of the Project would be less than significant. Adoption of the proposed Project would result in less than significant impacts related to wildfire either directly or indirectly or as a result of future projects facilitated by the WSAP because the WSAP would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; require the installation or maintenance of associated infrastructure 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; and expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Under Alternative 1, development would be in accordance with existing zoning and land use designations as the WSAP would not be adopted. Development under this Alternative would continue as in existing conditions and could be implemented in urban settings as allowed under the existing General Plan and LCP.

Even though future development would be consistent with the existing land use and zoning designations, future projects' potential for wildfire would be determined on a site-by-site basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Future development under this Alternative would also be required to comply with all federal, State, and local requirements relevant for wildfires, which would help to reduce impacts. However, since the timing, intensity, and location of future development permitted under Alternative 1 is unknown at this time, impacts associated with wildfires would be considered significant under Alternative 1. Even with incorporation of all applicable mitigation measures, obtaining all discretionary permits, and compliance with federal, State, and local requirements, it is speculative at this time to assume that all future projects would be able to reduce their impacts to wildfires to a less than significant level under this Alternative. Therefore, impacts related to wildfire under Alternative 1 would be significant and unavoidable, which would be greater impacts than those identified for the Project.

### 7.5.21 Conclusion

Implementation of Alternative 1 would result in similar impacts for the majority of issue areas as identified for the Project, with the exception of wildfire. Alternative 1 would result in significant and unavoidable impacts related to wildfire because that issue area is site specific, and regulatory compliance and mitigation measures cannot guarantee the reduction of impacts to a less than significant level. Since the timing, intensity, and location of future development permitted under Alternative 1 is unknown at this time, it is speculative at this time to assume that all future projects would be able to reduce these impacts to a less than significant level under Alternative 1; thus, the potential impacts remain significant and unavoidable. Furthermore, while the significance conclusion would be the same as the Project for energy impacts, Alternative 1 would result in more severe impacts because the energy efficiencies and savings and reduction in VMT would not be provided to the same extent as the Project. Finally, while the significance conclusion for population and housing would be the same as the Project, Alternative 1 would result in less severe impacts, as growth would occur at a slower rate as projected in the General Plan and Communities Plans.

## 7.6 HOUSING ELEMENT RESIDENTIAL UNITS ONLY

The Housing Element Residential Units Only Alternative (Alternative 2) would modify the WSAP to implement only the residential component of the Housing Element. The Housing Element identifies that the RHNA allocation for the Planning Area is 4,972 units to meet the broader unincorporated Countywide target of 89,232 units. This alternative represents an approximately 26 percent reduction in residential units (which includes 6,757 units) and in households (which includes 6,489 households) as compared to the proposed Project of the WSAP (refer to Table 7-6, *Alternative 2 and Proposed Project Development Comparison*).

**Table 7-6 Alternative 2 and Proposed Project Development Comparison (2045)**

| | Alternative 2 Conditions | Proposed Project Conditions | Difference |
|---|---|---|---|
| Housing Units | 4,972 | 6,757 | **1,785** |
| Households[1] | 4,773 | 6,489 | **1,716** |
| Population[2] | 12,033[3] | 15,704 | **3,671** |

Notes:
1 Based on the unincorporated Los Angeles County occupancy rate of 96%
2 Based on number of households. 15,704 people/6,489 housing units = 2.4 person per household
3 2.4 person per household x 4,972 housing units = 12,033 people

The 12 identified Opportunity Sites in the WSAP would be the same as the proposed Project, just at reduced densities than proposed by land use and zoning changes. The goals, policies, and implementation strategies in the WSAP would otherwise remain as currently proposed. As with the proposed Project, land uses within Inglewood Oil Field would be governed by the Baldwin Hills Community Standards District (BHCSD) and any future changes would be conducted under a separate planning process under this alternative.

By limiting the development within the Planning Area to only the RHNA-allocated units, it would be reasonable to assume that the proposed Project's impacts would be generally reduced by 26 percent under Alternative 2 as they relate to the residential component. Alternative 2 would achieve the proposed Project's objectives but on a reduced scale compared to the Project since it would allow for fewer housing choices. Alternative 2 was included for further analysis as an approach to meet the County's RHNA allocation with the goal of decreasing the severity of the proposed Project's significant environmental impacts.

## 7.6.1 Aesthetics

As discussed in Section 5.1, *Aesthetics*, of this Draft PEIR, implementation of the proposed Project would result in less than significant impacts related to aesthetics.

Development under Alternative 2 would be guided by the modified WSAP, which would feature reduced residential densities . Implementation of Alternative 2 would include land use and zoning changes to facilitate future development of only the RHNA-allocated units identified in the County's Housing Element and would occur in the same areas as the proposed Project. Future development of the RHNA-allocated units would be implemented in accordance with modified WSAP goals, policies, and implementation strategies; the adopted Housing Element; and land use designation regulations governing visual character and scenic quality, similar to the proposed Project. Additionally, similar to the proposed Project, future development impacts related to scenic vistas and views from regional riding, hiking, or multiuse trails would be less than significant, and there would be no impacts to scenic resources along a State scenic highway. Alternative 2 would result in the introduction of new sources of light, glare, and shade/shadow that would be incrementally reduced due to the elimination of dwelling units and nonresidential development. The reduction in units would result in a decrease in potential impacts compared to the proposed Project. However, any future residential units to be developed under this alternative would be developed in accordance with existing land use and zoning requirements, modified WSAP, as well as County Code Title 22 design standards. Alternative 2 would have a

reduced potential for future development as compared to the proposed Project. Therefore, impacts related to aesthetics under Alternative 2 would be less than significant like the proposed Project.

### 7.6.2 Agriculture and Forestry Resources

As discussed in Section 5.2, *Agriculture and Forestry Resources*, of this Draft PEIR, the proposed Project would have no impacts related to agriculture and forestry resources.

Under this alternative, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Impacts under Alternative 2 related to conflicts with existing zoning and agricultural use would be the same as the proposed Project and no impacts would occur. Neither Alternative 2 nor the proposed Project have land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance or timberland or timberland production. Similar to the proposed Project, Alternative 2 would not result in the loss of forest land and would not convert forest land to non-forest use. Therefore, impacts related to agriculture and forestry resources would be similar to the proposed Project.

### 7.6.3 Air Quality

As discussed in Section 5.3, *Air Quality*, of this Draft PEIR, the proposed Project would result in significant and unavoidable impacts.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Future development would be proposed and evaluated for environmental impacts on a project-by-project basis during the project entitlement process. During its individual environmental review process, potential air quality impacts would be identified and compared against relevant thresholds to determine significance. It is reasonable to assume that since future development under this alternative would be consistent with the recently adopted Housing Element, future projects would also demonstrate consistency with the applicable air quality plans, policies, and regulations as those projects would result in growth already accounted in SCAG's regional growth projections for within the Planning Area. Therefore, impacts related to conflicts with applicable air quality plans, policies, and regulations would be similar to the proposed Project.

Regarding the proposed Project's significant and unavoidable impacts, even with the implementation of applicable Draft PEIR mitigation measures development facilitated under Alternative 2 would also have the potential to result in similar impacts. Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the recently adopted Housing Element and modified WSAP. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential to impact air quality would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Future development would be subject to all applicable discretionary permits and would be required to comply with all federal, State, and local requirements relevant to air quality. Future projects would be subject to applicable General Plan mitigation measures identified for air quality as well as project-specific mitigation measures to

reduce potential impacts. Therefore, impacts to air quality would be less than the proposed Project due to the elimination of the nonresidential development component.

### 7.6.4 Biological Resources

As discussed in Section 5.4, *Biological Resources*, of this Draft PEIR, the proposed Project would have less than significant impacts related to biological resources.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and the recently adopted Housing Element. As described in Section 5.4 of this Draft PEIR, no critical habitat was designated within the areas identified for future development and no special status species were recorded. No natural rivers or streams that may serve as habitat for native fish species are within the areas identified for future development. Additionally, the Planning Area is not identified as being part of an adopted habitat conservation plan or natural community conservation plan. As with the proposed Project, any future development activities implementing Alternative 2 would be required to comply with all applicable requirements set forth by the County, including the Los Angeles County Oak Tree Ordinance. Because development would occur in areas associated with commercial and/or residential development (or redevelopment), the reduction of residential units would not substantially change the impact determinations related to biological resources. As with the proposed Project, all applicable Draft PEIR mitigation measures would be implemented to reduce impacts on biological resources. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential to impact biological resources would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Therefore, impacts related to biological resources would be similar to the proposed Project.

### 7.6.5 Cultural Resources

As discussed in Section 5.5, *Cultural Resources,* of this Draft PEIR, the proposed Project would have less than significant impacts related to cultural resources.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Because development would occur in areas associated with commercial and/or residential development (or redevelopment), the reduction of residential development would not substantially change the impact determinations related to cultural resources. Additionally, all applicable Draft PEIR mitigation measures would be implemented to reduce impacts on cultural resources. The reduction in residential uses would slightly reduce earth-disturbing activities related to construction. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential to impact cultural resources would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Therefore, impacts related to cultural resources would be less than the proposed Project.

### 7.6.6 Energy

As discussed in Section 5.6, *Energy*, of this Draft PEIR, the proposed Project would have less than significant impacts related to energy.

Similar to the proposed Project, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Additionally, similar to the proposed Project, implementation of Alternative 2 would increase the demand for electricity, natural gas, gasoline, and diesel consumption in the Planning Area during construction and operation of future development. However, similar to the proposed Project, Alternative 2 would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum during Project implementation. Neither the proposed Project nor Alternative 2 would conflict or obstruct a State or local plan for renewable energy or energy efficiency. Additionally, all the rules and regulations presented in Section 5.6, *Energy*, of this Draft PEIR would continue to be applicable to future residential development under both proposed Project and Alternative 2 conditions, which would help reduce energy demand and increase energy efficiency under both scenarios. The scope of the residential component of Alternative 2 would be 26 percent less than the proposed Project. Thus, it is reasonable to assume that impacts related to energy consumption generated by the residential component would be reduced by 26 percent under Alternative 2. Therefore, impacts related to energy consumption would be less than the proposed Project.

### 7.6.7 Geology and Soils

As discussed in Section 5.7, *Geology and Soils*, the proposed Project would result in less than significant impacts related to geology and soils after incorporation and implementation of Mitigation Measures GEO-1 through GEO-3.

Alternative 2 would result in similar future development/redevelopment activity related to housing as the proposed Project, just at reduced densities. Additionally, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Any new development would be site specific and would be exposed to existing geologic and soil conditions and hazards that would be unique to that property. Similar to the proposed Project, Alternative 2 would not increase the potential for existing geological hazards or create new, significant hazardous geology and soils conditions, similar to the proposed Project as discussed in Section 5.7, *Geology and Soils*, of this Draft PEIR. Compliance with existing regulatory requirements and policies and implementation of applicable Draft PEIR mitigation measures would be required under Alternative 2. As with the proposed Project, future discretionary projects would be required to address the potential for adverse effects related to geological hazards, such as seismic activity, ground shaking, liquefaction, landslides, ground failure, soil expansion, and soil stability on a site-by-site basis. Because the reduction of residential units would not represent a significant reduction in potential geology and soils impacts compared to the buildout potential of housing and mixed-use development, impacts would be similar to the proposed Project.

### 7.6.8 Greenhouse Gas Emissions

As discussed in Section 5.8, *Greenhouse Gas Emissions*, the proposed Project would result in less than significant cumulative impacts related to GHG emissions and global climate change.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would generate GHG emissions similar to the proposed Project, but the reduction in residential units would result in the reduction of emission under this alternative due to a reduction in activities related to construction and operation. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential impacts related to GHG emissions would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Under both the proposed Project and Alternative 2, less than significant impacts would occur related to the generation of GHG emissions. Additionally, the proposed Project and Alternative 2 would be consistent with all applicable plans, policies, or regulations adopted for the purposes of reducing GHG emissions, and impacts would be less than significant. Under Alternative 2 and the proposed Project, no change to existing regulations would occur that would result in a conflict with existing regulations. The scope of the residential component of Alternative 2 would be 26 percent less than the proposed Project. Thus, it is reasonable to assume that impacts related to GHG emissions generated by the residential component would be reduced by 26 percent, under Alternative 2. Therefore, impacts related to GHG emission would be less than the proposed Project.

### 7.6.9 Hazards and Hazardous Materials

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the proposed Project would result in less than significant impacts related to hazard and hazardous materials.

Under Alternative 2, development would occur in the same areas the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential impacts related to hazards and hazardous materials would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. At buildout, Alternative 2 would result in less development potential than what is proposed under the proposed Project due to the reduction in residential units and households (a 26 percent reduction). As such, the scope of development would be reduced as compared to the proposed Project, which would result in reduced potential for impacts associated with hazards. Therefore, impacts related to hazards and hazardous materials would be less than the proposed Project.

### 7.6.10 Hydrology and Water Quality

As discussed in Section 5.9, *Hydrology and Water Quality*, impacts related to hydrology and water quality would be less than significant.

At buildout, Alternative 2 would result in less development potential than what is proposed under the proposed Project due to the reduction in residential units. Additionally, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. As with the proposed Project, compliance with existing regulatory requirements and policies would reduce impacts from adverse effects related to hydrology and water quality. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential to impact hydrology and water quality would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. However, the scope of development/redevelopment activity anticipated to occur would be reduced due to the reduction of residential units as compared to the proposed Project. Therefore, impacts related to hydrology and water quality would be less than the proposed Project.

## 7.6.11 Land Use and Planning

As discussed in Section 5.11, *Land Use and Planning*, impacts related to land use and planning would be less than significant.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would not result in impacts associated with the physical division of established communities, similar to the proposed Project. Furthermore, all other impacts related to consistency with applicable land use plans, policies, and regulations would be similar to the proposed Project. Therefore, impacts related to land use and planning would be similar to the proposed Project.

## 7.6.12 Mineral Resources

As discussed in Section 5.12, *Mineral Resources*, impacts related to mineral resources would be less than significant.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. These areas are not identified as being within a mineral resource zone or designated as a mineral recovery site by the County's General Plan. Because development would occur in accordance with the modified WSAP which would implement the recently adopted Housing Element, future development under Alternative 2 would not result in the loss or availability of a known mineral resource or loss of a mineral resource recovery site. Therefore, impacts related to mineral resources would be similar to the proposed Project.

## 7.6.13 Noise

As discussed in Section 5.13, *Noise*, of this Draft PEIR, the proposed Project would result in significant and unavoidable impacts related to significant noise and vibration levels during construction and significant noise levels during operation.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would result in a 26 percent reduction in residential units compared to the proposed Project. Although future development would be consistent with the Housing Element and modified WSAP, future projects' potential impacts related to noise would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Significant and unavoidable impacts, even with the implementation of applicable Draft PEIR mitigation measures, would occur relative to the anticipated construction and operation of residential units, though likely at a reduced level given reduced operational traffic noise and construction noise. Moreover, Alternative 2 would require the same compliance requirements as the proposed Project. Therefore, noise impacts under Alternative 2 would be less than the proposed Project but would remain significant and unavoidable.

## 7.6.14 Population and Housing

As discussed in Section 5.14, *Population and Housing*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would result in a 26 percent reduction in residential units and households when compared to the proposed Project. Because the proposed Project would be implemented in accordance with the modified WSAP and recently adopted Housing Element, Alternative 2 would not exceed planned buildout projections in the Planning Area. Therefore, population and housing impacts under Alternative 2 would be less than the proposed Project.

## 7.6.15 Public Services

As discussed in Section 5.15, *Public Services*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would result in a 26 percent reduction in residential units and households when compared to the proposed Project. As with the proposed Project, future development under Alternative 2 would be required to pay development fees and taxes, which would fund public services to provide additional personnel and/or equipment and/or expand existing facilities to support population growth indirectly caused. Therefore, public services impacts under Alternative 2 would be less than the proposed Project.

## 7.6.16 Recreation

As discussed in Section 5.16, *Recreation*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would result in a

26 percent reduction in residential units and households when compared to the proposed Project, and would not exceed the planned buildout projections in the Planning Area. Therefore, impacts related to recreation under Alternative 2 would be less than the proposed Project.

## 7.6.17 Transportation

As discussed in Section 5.17, *Transportation*, of this Draft PEIR, the proposed Project would not result in inconsistencies with applicable plans addressing the circulation system, increase hazards, or result in inadequate emergency access; however, the proposed Project would result in significant and unavoidable impacts related to increases in VMT.

Alternative 2 would be developed in accordance with the modified WSAP and recently adopted Housing Element and would result in a 26 percent reduction in residential units and households as compared to the proposed Project. Alternative 2 would not conflict with an applicable plan, ordinance, or policy addressing the circulation system, similar to the proposed Project. Although the Planning Area represents a jobs-poor community under existing conditions, Los Angeles County as a whole is a jobs-rich area. Thus, daily VMT per service population would decrease when compared to the proposed Project by reducing the amount of housing. Therefore, impacts related to the consistency with CEQA Guidelines section 15064.3 subdivision (b) would be less than the proposed Project. Furthermore, this alternative would not result in significant impacts related to the increase of transportation hazards due to a design feature or incompatible use, nor would a significant impact occur relative to inadequate emergency access, similar to the proposed Project. Although this alternative would reduce VMT due to the reduced scope of development, the reduction would not reduce the proposed Project's significant and unavoidable impacts. Therefore, impacts related to transportation would be similar to the proposed Project.

## 7.6.18 Tribal Cultural Resources

As discussed in Section 5.18, *Tribal Cultural Resources*, of this Draft PEIR, the proposed Project would result in less than significant impacts with the implementation of Mitigation Measures CUL-2 through CUL-6.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Alternative 2 would reduce the amount of residential units and households (26 percent reduction) when compared to the proposed Project. Although future development would be consistent with the modified WSAP and recently adopted Housing Element, future projects' potential to impact tribal cultural resources would be determined on a site-by-site basis and would be evaluated during their environmental review process in accordance with CEQA, as applicable. Since a project's potential impact to tribal cultural resources is site-dependent, future development under this alternative would have a similar potential to impact tribal cultural resources as the proposed Project with the implementation of applicable Draft PEIR mitigation measures. Therefore, impacts related to tribal cultural resources would be similar to the proposed Project.

### 7.6.19 Utilities and Service Systems

As discussed in Section 5.19, *Utilities and Service Systems*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 2, development would occur in the same areas as the proposed Project but would be in accordance with the modified WSAP and recently adopted Housing Element. Similar to the proposed Project, development under Alternative 2 would not induce population growth beyond and would be guided by the recently adopted Housing Element projections. Therefore, development would incrementally increase in the proportion to the County's population growth projections, which would ensure that utility providers would be able to contain to serve the Planning Area. All other impacts related to utilities and service systems, including the availability of sufficient water supplies at the Project-level, the adequate capacity of wastewater treatment services, the generation of solid waste, and the compliance with management and reduction regulations of solid waste would be less than significant under the proposed Project. Therefore, impacts related to utilities and service systems would be less than the proposed Project.

### 7.6.20 Wildfire

As discussed in Section 5.20, *Wildfire*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Alternative 2 would not change the areas proposed for development under the proposed Project and discussed in Section 5.20, *Wildfire*, of this Draft PEIR. Development would occur in the same areas as the proposed Project and would be implemented in an urban setting. As with the proposed Project, future development under this alternative would also be required to comply with all federal, State, and local requirements relevant for wildfires, which would help to reduce impacts. Therefore, impacts related to wildfire would be similar to the proposed Project.

### 7.6.21 Conclusion

Implementation of Alternative 2 would result in similar impacts for all the issues as identified for the Project. Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts associated with air quality, noise, or transportation to a less than significant level, but would reduce the severity of these impacts due to the reduction in residential units. Additionally, while the significance conclusions would be the same as the proposed Project, Alternative 2 would reduce the impacts associated with cultural resources, energy, GHG emissions, population and housing, public services, recreation, and utilities and service systems. Alternative 2 would result in similar impacts to all other issue areas as the proposed Project.

## 7.7 NO COMMERICAL REZONE OR LAND USE CHANGES

The No Commercial Rezone or Land Use Changes Alternative (Alternative 3) would implement only the residential component of the proposed WSAP, which includes 6,757 residential dwelling unit, yielding 6,489 households, and would eliminate the 244,000 square feet of non-residential uses that are currently included in the WSAP (refer to Table 7-7, *Alternative 3 and Proposed Project Development Comparison [2045]*).

**Table 7-7 Alternative 3 and Proposed Development Project Comparison (2045)**

| | Alternative 3 Conditions | Proposed Project Conditions | Difference |
|---|---|---|---|
| Housing units | 6,757 | 6,757 | -- |
| Households | 6,489 | 6,489 | -- |
| Population | 15,704 | 15,704 | -- |
| Commercial Square Feet | 0 | 244,000 | 244,000 SF |
| Employment | 0 | 610 | 610 population |

By limiting development within the Planning Area to only the residential component, it would be reasonable to assume that all the impacts related to the proposed Project's commercial component would be avoided. The 12 identified Opportunity Sites included in the WSAP would be the same as the proposed Project. Additionally, Inglewood Oil Field would be identified as an Opportunity Site; however, as with the proposed Project, land uses would be governed by the BHCSD and any future changes would be conducted under a separate planning process. Alternative 3 would achieve the proposed Project's objectives as they relate to housing opportunities but would fail to meet objectives as they relate to mixed-use development, local economic growth, and prosperity of businesses due to the elimination of the commercial component. Alternative 3 was included for further analysis as an approach to exceeding the County's RHNA allocation for the Planning Area with the goal of decreasing the Project's environmental impacts.

## 7.7.1 Aesthetics

As discussed in Section 5.1, *Aesthetics*, of this Draft PEIR, implementation of the proposed Project would result in less than significant impacts related to aesthetics.

Under this alternative, development under Alternative 3 would be guided by the WSAP related to aesthetics and visual resources. Implementation of Alternative 3 would include the development of only the residential component of the proposed Project and would occur in the same areas as the proposed Project. Future development of this component would be implemented in accordance with the proposed WSAP goals and policies governing visual character and scenic quality, similar to the proposed Project. Additionally, similar to the proposed Project, future development impacts relatively to scenic vistas and views from regional riding, hiking, or multi-use trails would be less than significant and there would be no impacts to scenic resources along a State scenic highway. Alternative 3 would result in the introduction of new sources of light, glare, and shade/shadow, which would be incrementally reduced due to the elimination of dwelling units and non-residential development. The elimination of the non-residential component of the proposed Project would result in a decrease in potential impacts compared to the proposed Project. However, all residential units would be developed in accordance with the proposed land use and zoning requirements and WSAP, as well as County Code Title 22 design standards. Therefore, impacts related to aesthetics under Alternative 3 would be similar to the proposed Project.

## 7.7.2 Agriculture and Forestry Resources

As discussed in Section 5.2, *Agriculture and Forestry Resources*, of this Draft PEIR, the proposed Project would have no impacts related to agriculture and forestry resources.

Under this alternative, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Impacts under Alternative 3 related to conflicts with existing zoning and agricultural use would be the same as the proposed Project and no impacts would occur. Neither Alternative 3 nor the proposed Project have land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance or timberland or timberland production. Similar to the proposed Project, Alternative 3 would not result in the loss of forest land and would not convert forest land to non-forest use. Therefore, impacts related to agriculture and forestry resources would be similar to the proposed Project.

## 7.7.3 Air Quality

As discussed in Section 5.3, *Air Quality*, of this Draft PEIR, the proposed Project would result in significant and unavoidable impacts.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Future development would be proposed and evaluated for environmental impacts on a project-by-project basis during the project entitlement process. During its individual environmental review process in accordance with CEQA, as appropriate, potential air quality impacts would be identified and compared against relevant thresholds to determine significance. As with the proposed Project, future projects would also demonstrate consistency with the applicable air quality plans, policies, and regulations as those projects would result in growth already accounted in SCAG's regional growth projections for within the Planning Area. Therefore, impacts related to conflicts with applicable air quality plans, policies, and regulations would be similar to the proposed Project.

Regarding the proposed Project's significant and unavoidable impacts, even with the implementation of applicable Draft PEIR mitigation measures, development facilitated under Alternative 3 would also have the potential to result in similar impacts. Under Alternative 3, development would occur in the same areas as the proposed Project but not include the non-residential development component. As with the proposed Project, future development would be subject to any applicable discretionary permits made on a case-by-case basis and all would be required to comply with all federal, State and local requirements relevant to air quality. Because this alternative does not include the non-residential component, air quality impacts related to the nonresidential development would be eliminated. Therefore, impacts to air quality would be less than the proposed Project.

## 7.7.4 Biological Impacts

As discussed in Section 5.4, *Biological Resources*, of this Draft PEIR, the proposed Project would have less than significant impacts related to biological resources.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. As described in Section 5.4, *Biological Resources*, of this Draft PEIR, no critical habitat was designated within the areas identified for future development and no special status species were recorded. No natural rivers or streams that may serve as habitat for native fish species are within the areas identified for future development. Additionally, the Planning Area is not identified as being part of an adopted habitat conservation plan or natural community conservation plan. As with the proposed Project, any future development activities implementing Alternative 3 would be required to comply with all applicable requirements set forth by the County, including the Los Angeles County Oak Tree Ordinance. Because development would occur in areas associated with commercial and/or residential development (or redevelopment), the elimination of nonresidential development would not substantially change the impact determinations related to biological resources. Therefore, impacts related to biological resources would be similar to the proposed Project.

### 7.7.5 Cultural Resources

As discussed in Section 5.5, *Cultural Resources,* of this Draft PEIR, the proposed Project would have less than significant impacts related to cultural resources.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Because development would occur in areas associated with commercial and/or residential development (or redevelopment), the elimination of non-residential development would not substantially change the impact determinations related to cultural resources. The elimination of non-residential development would slightly reduce earth-disturbing activities related to construction. Future projects' potential to impact cultural resources would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. As with the proposed Project, this alternative would implement applicable Draft PEIR mitigation measures that would reduce impacts on cultural resources. Therefore, impacts related to cultural resources would be less than the proposed Project.

### 7.7.6 Energy

As discussed in Section 5.6, *Energy*, of this Draft PEIR, the proposed Project would have less than significant impacts related to energy.

Similar to the proposed Project, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,00 square feet of non-residential uses. Additionally, similar to the proposed Project, implementation of Alternative 3 would increase the demand for electricity, natural gas, gasoline, and diesel consumption in the Planning Area during construction and operation of future development. However, similar to the proposed Project, Alternative 3 would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum during Project implementation. Neither the proposed Project nor Alternative 3 would conflict or obstruct a State or local plan for renewable energy or energy efficiency. Additionally, all the rules and regulations presented in Section 5.6, *Energy*, of this Draft PEIR would continue to be applicable to future

residential development under both proposed Project and Alternative 3 conditions, which would help reduce energy demand and increase energy efficiency under both scenarios. The scope of the residential component of Alternative 3 would be the same as the proposed Project and the non-residential development would be eliminated. Thus, it is reasonable to assume that impacts related to energy consumption generated by the non-residential component would be eliminated under Alternative 3. Therefore, impacts related to energy consumption would be less than the proposed Project.

### 7.7.7 Geology and Soils

As discussed in Section 5.7, *Geology and Soils*, the proposed Project would result in less than significant impacts related to geology and soils after incorporation and implementation of Mitigation Measures GEO-1 through GEO-3.

Alternative 3 would result in the same future development/redevelopment activity related to housing as the proposed Project. Additionally, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Any new development would be site-specific and would be exposed to existing geologic and soil conditions and hazards that would be unique to that property. Similar to the proposed Project, Alternative 3 would not increase the potential for existing geological hazards or create new, significant hazardous geology and soils conditions, similar to the proposed Project as discussed in Section 5.7, *Geology and Soils*, of this Draft PEIR. Compliance with existing regulatory requirements and policies and implementation of applicable Draft PEIR mitigation measures would be required under Alternative 3. As with the proposed Project, future discretionary projects would be required to address the potential for adverse effects related to geological hazards, such as seismic activity, ground shaking, liquefaction, landslides, ground failure, soil expansion, and soil stability on a site-by-site basis. Similar to the proposed Project, individual projects under Alternative 3 would also be required to incorporate and implement all feasible mitigation measures to reduce impacts to paleontological resources, which could include but would not be limited to the same mitigation measures identified for the proposed Project. Because the elimination of non-residential development would not represent a significant reduction in potential geology and soils impacts compared to the buildout potential of housing and mixed-use development, impacts would be similar to the proposed Project.

### 7.7.8 Greenhouse Gas Emissions

As discussed in Section 5.8, *Greenhouse Gas Emissions*, the proposed Project would result in less than significant cumulative impacts related to GHG emissions and global climate change.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Alternative 3 would generate GHG emissions similar to the proposed Project, but the elimination of non-residential development would result in reduction of emission under this alternative due to a reduction in activities related to construction and operation. Under both the proposed Project and Alternative 3, less than significant impacts would occur related to the generation of GHG emissions. Additionally, the proposed Project and Alternative 3 would be consistent with all applicable plans, policies, or regulations adopted for the

purposes of reducing GHG emissions, and impacts would be less than significant. Future projects' potential impacts related to GHG emissions would be determined on a site-by-site basis and would be evaluated during their individual environmental review process in accordance with CEQA. Under Alternative 3 and the proposed Project, no change to existing regulations would occur and that would result In a conflict with existing regulations. The scope of the residential component of Alternative 3 would be the same as the proposed Project and the non-residential development would be eliminated. Thus, it is reasonable to assume that impacts related to GHG emissions generated by the residential component would be the same as the proposed Project and non-residential GHG emissions would be eliminated under Alternative 3. Therefore, impacts related to GHG emission would be less than the proposed Project.

### 7.7.9 Hazards and Hazardous Materials

As discussed in Section 5.9, *Hazards and Hazardous Materials*, the proposed Project would result in less than significant impacts related to hazard and hazardous materials.

Under Alternative 3, development would occur in the same areas the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. At buildout, Alternative 3 would result in less development potential than what is proposed under the proposed Project due to the elimination of non-residential development. Compliance with existing regulations, plans, and policies would ensure that future projects' impacts related to creating a hazard or using hazardous materials are minimized to the greatest extent feasible. Furthermore, during the future approval/environmental review processes, future projects would be required to demonstrate consistency with the County's emergency and/or evacuation plans and incorporate mitigation if it was determined that the project was inconsistent. With the incorporation of all applicable mitigation measures, obtaining all discretionary permits, and compliance with federal, State and local requirements, impacts related to hazards and hazardous materials under Alternative 3 would be less than significant. As such, the scope of development would be reduced as compared to the proposed Project, which would result in reduced potential for impacts associated with hazards. Therefore, impacts related to hazards and hazardous materials would be less than the proposed Project.

### 7.7.10 Hydrology and Water Quality

As discussed in Section 5.9, *Hydrology and Water Quality*, impacts related to hydrology and water quality would be less than significant.

At buildout, Alternative 3 would be guided by the WSAP and would result in less development potential than what is proposed under the proposed Project due to the elimination of 244,000 square feet of non-residential uses. As with the proposed Project, compliance with existing regulatory requirements and policies would reduce impacts from adverse effects related to hydrology and water quality. However, the scope of development/redevelopment activity anticipated to occur would be reduced due to the elimination of the non-residential development as compared to the proposed Project. Therefore, impacts related to hydrology and water quality would be less than the proposed Project.

### 7.7.11 Land Use and Planning

As discussed in Section 5.11, *Land Use and Planning*, impacts related to land use and planning would be less than significant.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Alternative 3 would not result in impacts associated with the physical division of established communities, similar to the proposed Project. Additionally, under this alternative, implementation of the recently adopted Housing Element would occur, but at higher densities. Furthermore, all other impacts related to consistency with applicable land use plans, policies, and regulations would be similar to the proposed Project, as discussed in Section 5.11, *Land Use and Planning*, of this Draft PEIR. Therefore, impacts related to land use and planning would be similar to the proposed Project.

### 7.7.12 Mineral Resources

As discussed in Section 5.12, *Mineral Resources*, impacts related to mineral resources would be less than significant.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. These areas are not identified as being within a mineral resource zone or designated as a mineral recovery site by the County's General Plan. As such, future development under Alternative 3 would not result in the loss or availability of a known mineral resource or loss of a mineral resource recovery site. Therefore, impacts related to mineral resources would be similar to the proposed Project.

### 7.7.13 Noise

As discussed in Section 5.13, *Noise*, of this Draft PEIR, the proposed Project would result in significant and unavoidable impacts related to significant noise and vibration levels during construction and significant noise levels during operation.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Alternative 3 would eliminate the significant and unavoidable impacts associated with the construction and operation of non-residential development; however, significant and unavoidable impacts, even with the implementation of applicable Draft PEIR mitigation measures, would occur relative to the anticipated construction and operation of residential units. Moreover, Alternative 3 would require the same compliance requirements as the proposed Project. Noise and vibration impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. Therefore, noise impacts under Alternative 3 would be less than the proposed Project but would remain significant and unavoidable.

### 7.7.14 Population and Housing

As discussed in Section 5.14, *Population and Housing*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Under this alternative, the Planning Area would result in similar buildout as the proposed Project and would implement the recently adopted Housing Element, and would not exceed planned buildout projections in the Planning Area. Therefore, population and housing impacts under Alternative 3 would be similar to the proposed Project.

### 7.7.15 Public Services

As discussed in Section 5.15, *Public Services*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. As with the proposed Project, future development under Alternative 3 would be required to pay development fees and taxes, which would fund public services to provide additional personnel and/or equipment and/or expand existing facilities to support population growth indirectly caused. Therefore, public services impacts under Alternative 3 would be similar to the proposed Project.

### 7.7.16 Recreation

As discussed in Section 5.16, *Recreation*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Alternative 3 would include the same number of residential units as the proposed Project. Thus, impacts under this alternative would be similar to the proposed Project. Alternative 3 would not exceed the planned buildout projections in the Planning Area. Therefore, impacts related to recreation under Alternative 3 would be similar to the proposed Project.

### 7.7.17 Transportation

As discussed in Section 5.17, *Transportation*, of this Draft PEIR, the proposed Project would not result in inconsistencies with applicable plans addressing the circulation system, increase hazards, or result in inadequate emergency access; however, the proposed Project would result in significant and unavoidable impacts related to increases in VMT.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of the non-residential uses. Alternative 3 would not conflict with an applicable plan, ordinance, or policy addressing the circulation system, similar to the proposed Project. The elimination of non-residential development as proposed under Alternative 3 would result in the removal of locally serving retail land uses, which tend to reduce VMT with alternative modes such as walking, within the immediate vicinity of residential neighborhoods. Although the Planning Area represents a jobs-poor community under existing conditions, Los Angeles County as a whole is a jobs-rich area. Thus, daily VMT per service population would decrease when compared to the proposed Project by providing more housing and reducing employment, and also reducing the jobs-housing balance. Therefore, impacts related to the consistency with CEQA Guidelines section 15064.3 subdivision (b) would be less than the proposed Project; however, impacts would remain significant and unavoidable. Furthermore, this alternative would not result in significant impacts related to the increase of transportation hazards due to a design feature or incompatible use nor would a significant impact occur relative to inadequate emergency access, similar to the proposed Project. Therefore, impacts related to transportation would be similar to the proposed Project.

## 7.7.18 Tribal Cultural Resources

As discussed in Section 5.18, *Tribal Cultural Resources*, of this Draft PEIR, the proposed Project would result in less than significant impacts with the implementation of Mitigation Measures CUL-2 through CUL-6.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the non-residential development component. Ground-disturbing activities associated with the construction on non-residential development would be eliminated under Alternative 3. As with the proposed Project, future projects' potential to impact tribal cultural resources would be determined on a site-by-site basis and would be evaluated during their environmental review process in accordance with CEQA, as applicable. Since a project's potential impact to tribal cultural resources is site-dependent, future development under this alternative would have a similar potential to impact tribal cultural resources as the proposed Project with the implementation of applicable Draft PEIR mitigation measures. Therefore, impacts related to tribal cultural resources would be similar to the proposed Project.

## 7.7.19 Utilities and Service Systems

As discussed in Section 5.19, *Utilities and Service Systems*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Under Alternative 3, development would occur in the same areas as the proposed Project and would be guided by the WSAP but would not include the 244,000 square feet of non-residential uses. Similar to the proposed Project, development under Alternative 3 would not induce population growth beyond SCAG's projection as development would implement the recently adopted Housing Element, but at higher densities. The scope of development under this alternative would be less than the proposed Project due to the elimination of the non-residential development. Thus, it is reasonable to assume that the non-residential development component utilities and service systems needs would be eliminated. Development would

incrementally increase as defined in the County's Housing Element and SCAG's population growth projections, which would ensure that utility providers would be able to contain to serve the Planning Area. All other impacts related to utilities and service systems, including the availability of sufficient water supplies at the Project-level, the adequate capacity of wastewater treatment services, the generation of solid waste, and the compliance with management and reduction regulations of solid waste would be less than significant under the proposed Project. Therefore, impacts related to utilities and service systems would be less than the proposed Project.

### 7.7.20 Wildfire

As discussed in Section 5.20, *Wildfire*, of this Draft PEIR, the proposed Project would result in less than significant impacts.

Alternative 3 would not change the areas identified as supporting future development under the proposed Project and discussed in Section 5.20, *Wildfire*, of this Draft PEIR. Development would occur in the same areas as the proposed Project and would be implemented in an urban setting. As with the proposed Project, future development under this alternative would also be required to comply with all federal, State, and local requirements relevant for wildfires, which would help to reduce impacts. Therefore, impacts related to wildfire would be similar to the proposed Project.

### 7.7.21 Conclusion

Implementation of Alternative 3 would result in similar impacts for all the issues as identified for the Project. Alternative 3 would not reduce any of the Project's significant and unavoidable impacts associated with air quality, noise, or transportation to a less than significant level, but would reduce the severity of these impacts due to the elimination of 244,000 square feet of nonresidential development. Additionally, while the significance conclusions would be the same as the proposed Project, Alternative 3 would reduce the impacts associated with air quality, cultural resources, energy, GHG emissions, population and housing, public services, recreation, and utilities and service systems. The WSAP would be adopted under Alternative 3; the goals, policies, and development features of the WSAP would be widely applied throughout the Planning Area. However, this alternative would not meet the proposed Project's objectives related to mixed-use and economic vitality. Alternative 3 would result in similar impacts to all other issue areas as the proposed Project.

## 7.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Project and Project Alternatives are considered and evaluated within this Draft PEIR. As suggested in the State CEQA Guidelines Section 25126.6(d), a matrix summarizing and comparing the impacts of the Project Alternatives with those of the Project is included in Table 7-8, *Summary of Alternative Impacts Compared to the Proposed Project*. As illustrated in the table below, only Alternative 1 would be able to reduce significant and unavoidable Project impacts while Alternative 2 and 3 would still result in the same significant and unavoidable impacts as the proposed Project. However, Alternative 1 would result in two new significant and unavoidable impacts compared to the proposed Project.

# 7. Alternatives to the Proposed Project

**Table 7-8 Summary of Alternatives Impacts Compared to the Proposed Project**

| Issue Areas | Proposed Project | Alternatives to the Proposed Project | | |
|---|---|---|---|---|
| | | Alternative 1 | Alternative 2 | Alternative 3 |
| 5.1 Aesthetics | LTS | = | ▲ | = |
| 5.2 Agriculture and Forestry Resources | NI | = | = | = |
| 5.3 Air Quality | SU | ▼ | ▼ | ▼ |
| 5.4 Biological Resources | LTSM | = | = | = |
| 5.5 Cultural Resources | LTSM | = | ▼ | = |
| 5.6 Energy | LTS | ▼ | ▼ | ▼ |
| 5.7 Geology and Soils | LTSM | = | = | = |
| 5.8 Greenhouse Gas Emissions | LTS | = | ▼ | ▼ |
| 5.9 Hazards and Hazardous Materials | LTS | = | ▼ | ▼ |
| 5.10 Hydrology and Water Quality | LTS | = | ▼ | = |
| 5.11 Land Use and Planning | LTS | = | = | = |
| 5.12 Mineral Resources | NI | = | = | = |
| 5.13 Noise | SU | ▼ | ▼ | ▼ |
| 5.14 Population and Housing | LTS | = | ▼ | ▼ |
| 5.15 Public Services | LTS | = | ▼ | ▼ |
| 5.16 Recreation | LTS | = | ▼ | = |
| 5.17 Transportation | SU | ▲ | = | ▼ |
| 5.18 Tribal Cultural Resources | LTSM | = | = | = |
| 5.19 Utilities and Service Systems | LTS | = | ▼ | ▼ |
| 5.20 Wildfire | LTS | ▲▲ | = | = |

Notes:
▲▲ Alternative would result in greater issue area impacts when compared to the proposed Project and the difference would be significant.
▲ Alternative would result in greater issue area impacts when compared to the proposed Project; however, this difference would be negligible and would not change the significance conclusion.
= Alternative would result in similar issue area impacts when compared to the proposed Project.
▼ Alternative would result in reduced issue area impacts when compared to the proposed Project; however, this difference would be negligible and would not change the significance conclusion.
▼▼ Alternative would result in reduced issue area impacts when compared to the Project and the difference would be significant.
NI = No Impact
LTS = Less than Significant Impact
LSTM = Less than Significant Impact with Mitigation
SU = Significant and Unavoidable Impact

Additionally, Table 7-9, *Ability of Alternatives to Meet Project Objectives*, compares the Project Alternatives in terms of whether they would meet the Project's objectives. As shown in Table 7-2, none of the Project Alternatives would be able to fully achieve the Project's objectives. Alternatives 2 and 3 would provide most of the Project's benefits but would limit the benefits due to a reduced scope of development.

**Table 7-9 Ability of Alternatives to Meet Project Objectives**

| Project Objectives | Alternative 1 | Alternative 2 | Alternative 3 |
|---|---|---|---|
| **Objective 1:** Preserve community character by focusing new housing and commercial development within existing commercial corridors and centers and in proximity to transit, while allowing changes in existing residential neighborhoods consistent with State legislation. | No | Partially | Partially |
| **Objective 2:** Provide greater housing choices for residents, consistent with the Housing Element | No | Yes | Yes |
| **Objective 3:** Foster the economic health and prosperity of local businesses by promoting a mix of uses and adaptability of buildings in response to the evolving commercial marketplace, nurturing small businesses, and attracting job opportunities and commercial services that serve local residents | No | No | No |
| **Objective 4:** Prioritize the development of businesses that serve and are accessible to their neighborhoods and reflect the history and culture of the Westside Planning Area. | No | No | No |
| **Objective 5:** Transform today's automobile dominant land use pattern and densities and improve streetscapes to promote a more active pedestrian environment. | No | No | No |
| **Objective 6:** Promote the inclusion of publicly accessible plazas and courtyards in new commercial and mixed-use development projects where residents can gather, participate in events, and celebrate the history and culture of the community. | No | No | No |
| **Objective 7:** Protect open spaces and natural resources while emphasizing sustainable building practices and implementing infrastructure improvements that are environmentally sensitive and minimize impacts on energy, water, air, and climate. | No | No | Partially |
| **Objective 8:** Provide a diversity of travel choices by enabling residents to efficiently and safely access destinations throughout the community by walking, biking, using public transit, and emerging forms of transportation. | No | No | Partially |

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No Project" Alternative is environmentally superior to the proposed Project, the environmentally superior development alternative must be identified. One alternative has been identified as "environmentally superior" to the proposed Project:

- Housing Element Residential Units Only (Alternative 2)

As shown in tables above, Alternative 1 would reduce the Project's significant and unavoidable impacts related to air quality and noise but would result in new significant and unavoidable impacts related wildfire and would increase significant and unavoidable impacts related to transportation. Therefore, this alternative is not the environmentally superior alternative.

Alternative 2 and 3 would result in similar impacts and would partially achieve the Project's objectives. However, since the scope of development would be greater under Alternative 3 and would implement the

# 7. Alternatives to the Proposed Project

WSAP, this alternative would provide greater benefits to the Planning Area as the goals and policies of the WSAP would be applied. While Alternative 2 would not reduce any of the Project's significant and unavoidable impacts, this alternative would reduce the severity of those impacts, as well as impacts related to cultural resources, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, population and housing, public services, recreation, and utilities and service systems. However, Alternative 2 would increase impacts related to aesthetics. Additionally, Alternative 2 would not implement all the goals and policies of the WSAP.

While Alternative 2 would reduce the severity of Project impacts, this alternative would not fully achieve the Project's objectives nor provide the benefits of the Project. For purposes of this Draft PEIR, Alternative 2 is considered the environmentally superior alternative for CEQA purposes because it would result further reduce Project impacts which were found significant and unavoidable or less than significant under the proposed Project.

# 8. Impacts Found Not to Be Significant

California Public Resources Code Section 21003 (f) states: "…it is the policy of the state that…[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." The Guidelines allow use of an Initial Study to document project effects that are less than significant (Guidelines Section 15063[a]). Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant, and were therefore not discussed in detail in the Draft Program Environmental Impact Report (PEIR).

As described in the Notice of Preparation (NOP) (see Appendix A) prepared for the proposed Project, all impact categories were found to have at least one potentially significant impact; therefore, all categories have been evaluated in the PEIR.

# 8. Impacts Found Not to Be Significant

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# 9. Significant Irreversible Changes Due to the Proposed Project

The State CEQA Guidelines (14 CCR 15000 et seq.) require an EIR to address any significant irreversible environmental changes that would result from the proposed Project should it be implemented. Pursuant to Section 15126.2(d), significant irreversible environmental impacts could involve any of the following:

- Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- Irreversible damage from environmental accidents associated with the project;
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project could result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

The proposed Project involves the creation of a long-range planning document, with future action programs identified including General Plan, zoning map, and advanced planning amendments. While the Westside Area Plan (WSAP) is intended to guide long-term growth of the Westside Planning Area, the proposed Project does not directly commit future generations to similar future uses as the intensity and timing of future development is unknown at this time. Any future development would be subject to compliance with the California Building Energy Efficiency Standards and California Green Building Standards Code and any State and Local regulations.

# 9. Significant Irreversible Changes Due to the Proposed Project

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# 10. Growth-Inducing Impacts of the Proposed Project

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this Draft Program Environmental Impact Report.

**Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

As discussed in Chapter 3, *Project Description*, the Westside Area Plan (proposed Project or WSAP) is intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life through the creation of vibrant, thriving, safe, healthy, and pleasant communities. The Westside Planning Area (Planning Area), the County, and the entire Southern California region has experienced dramatic growth in the past two decades, and this growth is expected to continue for the next two decades.

# 10. Growth-Inducing Impacts of the Proposed Project

The proposed Project could potentially indirectly induce growth through the removal of obstacles to additional growth and development by simplifying and streamlining land use and zoning regulations for the Planning Area. The WSAP does not, however, propose any specific infrastructure improvements that would result in growth. The proposed Project does not approve the construction of specific development projects and would largely accommodate growth based on market conditions. However, in some locations, it would allow increased development intensity and/or a more inclusive mix of land uses compared to existing conditions. Therefore, the proposed Project removes regulatory obstacles to growth, and is considered to be growth inducing.

**Would this project result in the need to expand one or more public services to maintain desired levels of service?**

Direct growth-inducing impacts are commonly associated with the extension of new public services, utilities, and roads into areas that have previously been undeveloped. The extension of such infrastructure into a non-serviced area can represent the elimination of a growth-limiting factor, thereby inducing growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities and ultimately resulting in an increase in the pace of development or the density of the existing surrounding development. Indirect growth inducing impacts include an increased demand for housing, commodities, and services that new development causes or attracts by increasing the population or job growth in an area. The WSAP does not, however, propose any specific infrastructure improvements that would result in growth.

**Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

Future development consistent with the proposed Project would create a number of temporary construction jobs during development of future individual projects implemented under the WSAP. This would be a direct, growth-inducing effect of the proposed Project. Although the WSAP would not build new housing that results in direct population increases, it would create higher density residential zones, which would allow for construction of additional units and therefore result in indirect population growth. This planned growth would occur near areas already identified as community serving and central to Planning Area communities and would be consistent with existing Regional Housing Needs Allocations. Therefore, the proposed Project would have indirect growth-inducing effects.

**Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

Cities and counties in California periodically update their general plans elements pursuant to California Government Code Sections 65300 et seq., where the adoption of these types of plans do not necessarily set a precedent that could encourage and facilitate other activities that may significantly affect the environment. As discussed in Chapter 3, *Project Description*, the proposed Project consists of the preparation of the WSAP, which is intended to respond to local planning challenges, guide long-term development, enhance community spaces, promote a stable and livable environment that balances growth with preservation, and improve the quality of life through the creation of vibrant, thriving, safe, healthy, and pleasant communities. Although the proposed Project does not include approval of physical development, the proposed changes to land use and zoning designations would increase growth in the Planning Area compared to existing conditions. Much of this

development capacity is either available under existing conditions or is limited to targeted areas. Furthermore, the intensity of development projects implemented under the WSAP would be directly driven by market demands rather than by new development capacity created by land use changes included in the WSAP. However, because approval of the proposed Project would ultimately result in subsequent projects that would have their own environmental impacts—including potentially significant impacts—the proposed Project is a precedent-setting and growth-inducing action.

# 10. Growth-Inducing Impacts of the Proposed Project

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# 11. Report Preparation

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|---|---|
| Patricia Horsley | Environmental Planner |

### Los Angeles County Metropolitan Transportation Authority

| | |
|---|---|
| Cassie Truong | Senior Transportation Planner |

# 11. Report Preparation

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